



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
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TO: Interested Parties / Applicant
DATE: September 17, 2008
RE: ANR Pipeline Company / 089-17532-00069
FROM: Matthew Stuckey, Deputy Branch 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, Suite N 501E, 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.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY and IDEM Northwest Regional Office

ANR Pipeline Company - St. John Station
10313 White Oak Avenue
St. John, Indiana 46373

(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.: T 089-17532-00069	
Original signed by: Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: September 17, 2008 Expiration Date: September 17, 2013

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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 natural gas compressor station.

Source Address:	10313 White Oak Avenue, St. John, Indiana 46373
Mailing Address:	EH&S- Air Group, P.O. Box 2446, Houston, Texas 77252-2446
General Source Phone Number:	(219) 365-8511
SIC Code:	4922
County Location:	Lake
Source Location Status:	Moderate non-attainment for ozone based on the 8-hour standard Non-attainment for PM _{2.5} Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act

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

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

- (a) Four (4) natural gas-fired, spark ignition, two-stroke, lean burn, reciprocating internal combustion engine compressors, identified as E01 through E04, installed in 1951, and exhausting to stacks S01 through S04, respectively, with an output capacity of 1,550 horsepower, each, and a heat input capacity of 12.66 million British thermal units per hour, each.
- (b) Two (2) natural gas-fired, spark ignition, two-stroke, lean burn, reciprocating internal combustion engine compressors, identified as E06 and E07, installed in 1972 and 1973, and exhausting to stacks S06 and S07, respectively, equipped with Low Emission Combustion (LEC) technology, with an output capacity of 12,000 horsepower, each, and a heat input capacity of 89.86 million British thermal units per hour, each.
- (c) One (1) intermittent use, natural gas-fired, spark ignition, four-stroke, lean burn generator, identified as G08, installed in 1995, and exhausting to stack S08, with an output capacity of 825 horsepower, and a heat input capacity of 6.0 million British thermal units per hour.
- (d) One (1) natural gas-fired, spark ignition, four-stroke, lean burn reciprocating internal combustion engine compressor, identified as E09, installed in 2005, and exhausting to stack S09, equipped with an oxidation catalyst, identified as C09, to control CO and HAP emissions, with an output capacity of 2,000 horsepower, and a heat input capacity of 15.6 million British thermal units per hour.
- (e) One (1) condensate storage tank, identified as TK004, installed in 1972, capacity: 10,000 gallons.

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 million (10,000,000) British thermal units per hour, including:
 - (1) One (1) boiler, constructed on April 5, 1972, heat input capacity: 5.021 million British thermal units per hour. [326 IAC 6.8]
 - (2) Space heaters, heat input capacity: less than 2 million British thermal units per hour, total. [326 IAC 6.8]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including:
 - One (1) cold cleaner equipped with a remote solvent reservoir, constructed on March 25, 2002. [326 IAC 8-3-2]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.8]
- (d) Ethylene glycol (Ambitol) storage tanks, including the following:
 - (1) One (1) tank, identified as TK005, installed in 1965, capacity: 12,000 gallons; and
 - (2) One (1) tank, identified as TK006, installed in 1965, capacity: 500 gallons. [326 IAC 8-9]
- (e) Paved roads and parking lots with public access. [326 IAC 6-4]

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

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

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

SECTION B

GENERAL CONDITIONS

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

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

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

- (a) This permit, T 089-17532-00069, 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 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) The "responsible official" is defined at 326 IAC 2-7-1(34).

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-3. 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 is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1 (34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
Northwest Regional Office phone: 219-757-0265; fax: 219-757-0267
 - (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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

IDEM Northwest Regional Office
8380 Louisiana St.
Merrillville, Indiana 46410-9201

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compli-

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T 089-17532-00069 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,

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

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated non-compliance 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
MC 61-53 IGCN 1003
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] [40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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
MC 61-53 IGCN 1003
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.
- (f) This condition does not apply to emission trades of SO₂ or NO_x under 326 IAC 21 or 326 IAC 10-4.

B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2] [326 IAC 2-3-2]

- (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 and/or 326 IAC 2-3-2.

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

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, 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
MC 61-53 IGCN 1003
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 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.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

C.3 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.4 Fugitive Dust Emissions [326 IAC 6-4]

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

C.5 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 two hundred sixty (260) linear feet on pipes or one hundred sixty (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
MC 61-52 IGCN 1003
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 14-10-1, 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 seventy-five hundredths (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.6 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
MC 61-53 IGCN 1003
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.7 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.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require 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.9 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.10 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 May 4, 2005.
- (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.11 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.12 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as soon as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.13 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. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (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 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.14 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(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(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
MC 61-50 IGCN 1003
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 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
MC 61-50 IGCN 1003

Indianapolis, Indiana 46204-2251

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

- (c) The emission statement required by this permit shall be considered timely if the date post-marked 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.15 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner 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 (as defined in 40 CFR 51.165 (a)(6)(vi)(A), 40 CFR 51.165 (a)(6)(vi)(B), 40 CFR 51.166 (r)(6)(vi)(a), and/or 40 CFR 51.166 (r)(6)(vi)(b)) that a “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) 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/or 326 IAC 2-3-1(mm)(2)(A)(iii); and
- (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of

regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

- (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
MC 61-53 IGCN 1003
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 record keeping provisions of (c) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) 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) and/or 326 IAC 2-3-1(qq)), for that regulated NSR pollutant, and
- (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (g) If a report must be submitted pursuant to C.16(f), above, it shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
- (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C - General Record Keeping Requirements.
- (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

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

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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.17 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)]: Six (6) engine compressors (E01 - E04, E06 and E07)

- (a) Four (4) natural gas-fired, spark ignition, two-stroke, lean burn, reciprocating internal combustion engine compressors, identified as E01 through E04, installed in 1951, and exhausting to stacks S01 through S04, respectively, with an output capacity of 1,550 horsepower, each, and a heat input capacity of 12.66 million British thermal units per hour, each.
- (b) Two (2) natural gas-fired, spark ignition, two-stroke, lean burn, reciprocating internal combustion engine compressors, identified as E06 and E07, installed in 1972 and 1973, and exhausting to stacks S06 and S07, respectively, equipped with Low Emission Combustion (LEC) technology, with an output capacity of 12,000 horsepower, each, and a heat input capacity of 89.86 million British thermal units per hour, each.

(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 Particulate [326 IAC 6.8]

Pursuant to 326 IAC 6.8-1-2(a), particulate emission rate from the six (6) engine compressors, identified as E01 through E04, E06, and E07, shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three hundredths (0.03) grain per dry standard cubic foot (dscf)).

D.1.2 Nitrogen Oxides (NO_x) Emissions [326 IAC 10-5-3(b)]

Pursuant to 326 IAC 10-5-3(b)(1), during the ozone season (time period between May 1 and September 30 of any year), the NO_x emissions from Emission Units E06 and E07 shall each not exceed 5.3 grams per brake horsepower per hour (g/bhp-hr).

D.1.3 Preventive 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 Emission Units E06 and E07.

Compliance Determination Requirements

D.1.4 Nitrogen Oxides (NO_x) Emissions

In order to comply with D.1.2, Low Emission Combustion (LEC) technology shall be in operation and reducing NO_x emissions from Emission Units E06 and E07 at all times that the emission units are in operation during the ozone season from May 1st through September 30th of each year. After May 1, 2007, compliance is demonstrated by non-operation of the Emission Units E06 and E07 until LEC is installed and operating properly. Emission Units E06 and E07 and corresponding LECs shall be in operation according to vendor specifications or according to operational parameters determined during stack test.

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 10-5-4]

- (a) Pursuant to 326 IAC 10-5-4(1), within 180 days after the initial start up of Emission Units E06 and E07 with the LEC technology, in order to demonstrate compliance with Condition D.1.2, the Permittee shall perform an initial performance test for NO_x for both Emission Units E06 and E07, consistent with the requirements of 40 CFR 60, Appendix A*. Testing shall be repeated every five (5) years. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) Pursuant to 326 IAC 10-5-4(2), the Permittee shall perform annual performance tests on Emission Units E06 and E07 using portable monitors using ASTM D6522-00 to show compliance with condition D.1.2 (annual performance tests using portable monitors are not required for a given Emission Unit during calendar years when a performance test

required by subsection (a) of this Condition is performed on that unit). Alternatively, ANR can use a parametric monitoring program (as specified in 326 IAC 10-5-4(2)(B)) to periodically monitor the source's compliance with the projected NO_x emission rate, after obtaining prior approval from IDEM for the parameter ranges.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records documenting that all combustion facilities are fired only with natural gas.
- (b) Pursuant to 326 IAC 10-5-5(a), the Permittee shall maintain all records necessary to demonstrate compliance with the requirements of this rule. Each record shall be maintained for a period of two (2) calendar years at the plant at which the subject engine is located. The records shall be made available to the IDEM, OAQ and U.S. EPA upon request. The Permittee shall maintain the following records:
 - (1) Identification and location of each engine subject to the requirements of this rule.
 - (2) Calendar date of record.
 - (3) The number of hours the unit is operated during each ozone season compared to the projected operating hours.
 - (4) Type and quantity of fuel used.
 - (5) The results of all compliance tests.
 - (6) Monitoring data.
 - (7) Preventative maintenance.
 - (8) Corrective actions.
- (c) Pursuant to 326 IAC 10-5-5(b), the Permittee shall submit results of all compliance tests to IDEM, OAQ within forty-five (45) days after completion of the testing.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Generator (G08)

- (c) One (1) intermittent use, natural gas-fired, spark ignition, four-stroke, lean burn generator, identified as G08, installed in 1995, and exhausting to stack S08, with an output capacity of 825 horsepower, and a heat input capacity of 6.0 million British thermal units per hour.

(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 [326 IAC 6.8]

Pursuant to 326 IAC 6.8-1-2(a), particulate emission rate from the one (1) generator, identified as G08, shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three hundredths (0.03) grain per dry standard cubic foot (dscf)).

D.2.2 Emission Offset Minor Limit [326 IAC 2-3]

The one (1) intermittent generator, identified as G08, shall not operate more than 3,000 hours per twelve (12) consecutive month period, with compliance determined at the end of each month, and the NO_x emissions shall not exceed 4.08 pounds per million British thermal units of heat input. This limit results in the potential to emit less than forty (40) tons per year of NO_x from the one (1) intermittent generator, identified as G08. Therefore, the addition of this facility was a minor modification to an existing major source, pursuant to 326 IAC 2-3, and this limit renders 326 IAC 2-3, Emission Offset, not applicable, pursuant to AA 089-11359-00069 issued on January 21, 2000.

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

D.2.3 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records of the number of hours the one (1) generator, identified as G08, operates each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: One (1) engine compressor (E09)

- (d) One (1) natural gas-fired, spark ignition, four-stroke, lean burn reciprocating internal combustion engine compressor, identified as E09, installed in 2005, and exhausting to stack S09, equipped with an oxidation catalyst, identified as C09, to control CO and HAP emissions, with an output capacity of 2,000 horsepower, and a heat input capacity of 15.6 million British thermal units per hour.

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

Operation Conditions

Emission Limitations and Standards

D.3.1 Particulate [326 IAC 6.8]

Pursuant to 326 IAC 6.8-1-2(a), particulate emission rate from the one (1) engine compressor, identified as E09, shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three hundredths (0.03) grain grain per dry standard foot (dscf)).

D.3.2 Minor Source Modification and Emission Offset Minor Limit [326 IAC 2-7-10.5] [326 IAC 2-3]

Pursuant to 326 IAC 2-7-10.5 and 326 IAC 2-3 the NO_x emissions from the one (1) engine compressor, identified as E09, shall be limited to 0.000371 pounds per cubic foot of natural gas. Compliance with this limit will limit the potential to emit of NO_x to less than twenty-five (25) tons per year rendering 326 IAC 2-7-10.5(g) not applicable, and less than forty (40) tons per year, rendering 326 IAC 2-3 Emission Offset, not applicable.

D.3.3 General Provisions Relating to National Emission Standards (NESHAP) [40 CFR 63, Subpart A][326 IAC 20]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which will be incorporated by reference as 326 IAC 20, apply to the facility described in this section as specified in Table 8 of 40 CFR Part 63, Subpart ZZZZ. The Permittee shall comply with the requirements of this condition upon startup. [40 CFR 63.6665]

D.3.4 Operation and Maintenance Provisions Relating to National Emission Standards (NESHAP) [40 CFR 63.6]

- (a) At all times, including periods of startup, shutdown, and malfunction, The Permittee shall operate and maintain the Stationary Rice (E09), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. [40 CFR 63.6(e)(1)(i)]
- (b) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan required by condition D.2.3. [40 CFR 63.6(e)(1)(ii)]
- (c) To the extent that an unexpected event arises during a startup, shutdown, or malfunction, the Permittee shall comply by minimizing emissions during such a startup, shutdown, and malfunction event consistent with the safety and good air pollution control practices. [40 CFR 63.6(e)(1)(ii)]

D.3.5 Startup, Shutdown, and Malfunction Provisions Relating to National Emission Standards (NESHAP) [40 CFR 63.6]

The Permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the Stationary RICE (E09) during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control and monitoring equipment used to comply with the

relevant standard. This plan shall be developed by the Permittee, upon initial startup [40 CFR 63.6(b). [40 CFR 63.6(e)(3)(i)]

- (a) When actions taken by the Permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) are consistent with the procedures specified in the Permittee's startup, shutdown, and malfunction plan, the Permittee shall keep records for that event which demonstrate that the procedures specified in the plan were followed. [40 CFR 63.6(e)(3)(iii)]
 - (1) The Permittee shall keep records of these events as specified in Sec. 63.10(b), including records of the occurrence and duration of each startup, shutdown, or malfunction of operation and each malfunction of the air pollution control and monitoring equipment.
 - (2) Furthermore, the Permittee shall confirm that actions taken during the relevant reporting period during periods of startup, shutdown, and malfunction were consistent with the affected source's startup, shutdown and malfunction plan in the semiannual (or more frequent) startup, shutdown, and malfunction report required in Sec. 63.10(d)(5).
- (b) When actions taken by the Permittee during a startup, shutdown, or malfunction (including an action taken to correct a malfunction) are not consistent with the procedures specified in the startup, shutdown, and malfunction plan, and the stationary RICE (E09) exceeds any applicable emission limitation in the relevant emission standard, then the Permittee shall: [40 CFR 63.6(e)(3)(iv)]
 - (1) Record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan,
 - (2) Followed by a letter within 7 working days after the end of the event, in accordance with Sec. 63.10(d)(5).
- (c) The Permittee shall maintain a current startup, shutdown, and malfunction plan and must make the plan available upon request for inspection and copying by IDEM, OAQ, in accordance with the provisions in 40 CFR 63.6(e)(3)(v). [40 CFR 63.6(e)(3)(v)]
- (d) Based on the results of a determination made under 40 CFR 63.6(e)(1)(i), IDEM, OAQ, may require the Permittee to make changes to the startup, shutdown, and malfunction plan. [40 CFR 63.6(e)(3)(vii)]
- (e) The Permittee may periodically revise the startup, shutdown, and malfunction plan for the Stationary RICE (E09) as necessary to satisfy the requirements of 40 CFR 63.6(e)(3) or to reflect changes in equipment or procedures at the Stationary RICE (E09). Unless IDEM, OAQ provides otherwise, the Permittee may make such revisions to the startup, shutdown, and malfunction plan without prior approval by IDEM, OAQ. However, each such revision to a startup, shutdown, and malfunction plan must be reported in the semiannual report required by Sec. 63.10(d)(5). [40 CFR 63.6(e)(3)(viii)]
- (f) Whenever the startup, shutdown, and malfunction plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the startup, shutdown, and malfunction plan at the time the Permittee developed the plan, the Permittee shall revise the startup, shutdown, and malfunction plan within 45 days after the event to include detailed procedures for operating and maintaining the source during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control and monitoring equipment. [40 CFR 63.6(e)(3)(viii)]
- (g) Upon making a revisions to the startup, shutdown, and malfunction plan which alters the scope of the activities at the Stationary RICE (E09) which are deemed to be a startup,

shutdown, or malfunction, or otherwise modifies the applicability of any emission limit, work practice requirement, or other requirement in a standard established under this part, the revised plan shall not take effect until after the Permittee has provided a written notice describing the revision to IDEM, OAQ. [40 CFR 63.6(e)(3)(viii)]

D.3.6 National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

The provisions of 40 CFR Part 63, Subpart ZZZZ - National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines, which will be incorporated by reference into 326 IAC 20, apply to the Stationary Rice (E09).

- (a) Upon startup [40 CFR 63.6595(a)(3)], the Permittee must comply with the following emission and operating limitations: [40 CFR 63.6600(b)]
- (1) CO emissions shall be reduced by ninety-three (93) percent or more. [40 CFR 63, Subpart ZZZZ, Table 2a(2)(a)]

The emissions rate E has been established for E09 as follows:

Emission Unit	CO Emissions Controlled (lbs/hr)	CO Emissions Controlled (tons/year)
E09	0.35	1.52

- (2) Maintain the catalyst so that the pressure drop across the catalyst does not change by more than two (2) inches of water at one hundred (100) percent load plus or minus ten (10) percent from the pressure drop across the catalyst that was measured during the initial performance test. [40 CFR 63, Subpart ZZZZ, Table 2b(1)(a)]
- (3) Maintain the temperature of the Stationary RICE (E09) exhaust so that the catalyst inlet temperature is greater than or equal to 450 degrees Fahrenheit and less than or equal to 1350 degrees Fahrenheit. [40 CFR 63, Subpart ZZZZ, Table 2b(1)(b)]
- (b) The Permittee must operate and maintain the Stationary RICE (E09), including air pollution control and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times, including during startup, shutdown, and malfunction. [40 CFR 63.6605]
- (c) The definitions of 40 CFR 63, Subpart ZZZZ at 40 CFR 63.6675 are applicable to the affected source.

D.3.7 Continuous Compliance Requirements Relating to National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

The Permittee shall monitor and collect data according to the following: [40 CFR 63.6635(a)]

- (a) Except for monitor malfunctions, associated repairs, and the required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall monitor continuously at all times that the Stationary RICE (E09) is operating. [40 CFR 63.6635(b)]
- (b) The Permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The Permittee must, however, use all the valid data collected during all other periods. [40 CFR 63.6635(c)]

D.3.8 Part 70 Minor Source Modifications [326 IAC 2-7-10.5(d)(3)]

The potential to emit of NO_x shall not exceed 0.000371 pounds of NO_x per standard cubic foot of fuel. This rate will limit the potential to emit of NO_x to 24.14 tons per 12 consecutive month period.

This limitation equates to the emissions rate E which has been established for E09 as follows:

Emission Unit	NO _x Emissions (lbs NO _x /scf fuel)	NO _x Emissions (tons/year)
E09	3.71 E10-4	24.14

Compliance with this limit makes this a minor source modification. Therefore, Prevention of Significant Deterioration (PSD) 326 IAC 2-2 is rendered not applicable, Emission Offset 326 IAC 2.3 is rendered not applicable.

D.3.9 Preventive 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 (E09 engine) and any control devices.

Compliance Determination Requirements

D.3.10 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-3]

Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify the NO_x emission rate as per Condition D.3.8 Part 70 Source Modification for the stationary RICE (E09), utilizing methods as approved by the commissioner. This test shall be repeated once every five years from the date of the most recent valid compliance demonstration. Testing shall be repeated at least once every five years from the date of the most recent compliance demonstration. testing shall be conducted in accordance with Section - C Performance Testing.

D.3.11 Testing Requirements Relating to National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

- (a) The Permittee shall conduct the following applicable initial performance test or other initial compliance demonstrations within 180 days after startup [40CFR 63.6595(a)(3)] and according to the provisions in 40 CFR 63.7(a)(2): [40CFR 63.6610(a)]
- (1) Measure the O₂ at the inlet and outlet of the control device using a portable CO and O₂ analyzer and according to ASTM D6522-00. Measurements to be made at the same time as the measurements for CO concentration. [40 CFR 63, Subpart ZZZZ, Table 4(1)(a)(i)]
 - (2) Measure the CO at the inlet and outlet of the control device using a portable CO and O₂ analyzer and according to ASTM D6522-00. The CO concentration must be at fifteen (15) percent O₂ dry basis. [40 CFR 63, Subpart ZZZZ, Table 4(1)(a)(ii)]
- (b) The Permittee shall conduct subsequent performance test. [40CFR 63.615]
- (1) The Permittee shall conduct subsequent performance tests semi-annually. [40 CFR 63, Subpart ZZZZ, Table 3(1)]
 - (2) After the Permittee has demonstrated compliance for two consecutive tests, the frequency of subsequent performance test maybe reduced to annually. If the results of subsequent annual test indicate the Stationary RICE (E09), is not in compliance with the CO emission limitation, or the Permittee deviates from any operating limitations, D.2.4., the Permittee shall resume semi-annual performance tests. [Footnote to 40 CFR 63 Subpart ZZZZ, Table 3(1)]
- (c) Each performance test shall be conducted according to the requirements of 40 CFR

63.7(e)(1) and under the specific conditions specified in Table 4 of 40 CFR 63, Subpart ZZZZ. The test must be conducted at any load condition within plus or minus ten (10) percent of one hundred (100) percent load. [40 CFR 63.6615]

- (d) Pursuant to 40 CFR 63.6620(c), the Permittee shall not conduct performance test during periods of startup, shutdown, or malfunction as specified in 40 CFR 63.7(e)(1).
- (e) The Permittee shall conduct three (3) separate test runs for each performance test required in 40 CFR 63.6620 according to the specifications in 40 CFR 63.7(e)(3). Each test run must last at least one (1) hour. [40 CFR 63.6620(d)]
- (f) The Permittee shall use Equation 1 of 40 CFR 63.6620(e)(1) to determine compliance with the percent reduction requirement: [40 CFR 63.6620(e)(1)]

$$\frac{C_i - C_o}{C_i} \times 100 = R \quad (\text{Eq. 1})$$

Where: C_i = concentration of CO at the control device inlet,
 C_o = concentration of CO at the control device outlet, and
 R = percent reduction of CO emissions.

- (g) The Permittee shall normalize the carbon monoxide (CO) concentrations at the inlet and outlet of the control device to a dry basis and to 15 percent oxygen, or an equivalent percent carbon dioxide (CO₂). If pollutant concentrations are to be corrected to 15 percent oxygen and CO₂ concentration is measured in lieu of oxygen concentration measurement, a CO₂ correction factor is needed. Calculate the CO₂ correction factor as described in 40 CFR 63.6620(e)(2)(i) through (iii): [40 CFR 63.6620(e)(2)]

- (1) Calculate the fuel-specific F_o value for the fuel burned during the test using values obtained from Method 19, section 5.2, and the following equation: [40 CFR 63.6620(e)(2)(i)]

$$F_o = \frac{0.209 F_d}{F_c} \quad (\text{Eq. 2})$$

Where: F_o = Fuel factor based on the ratio of oxygen volume to the ultimate CO₂ volume produced by the fuel at zero percent excess air.

0.209 = Fraction of air that is oxygen, percent/100.

F_d = Ratio of the volume of dry effluent gas to the gross calorific value of the fuel from Method 19, dsm^3/J ($\text{dscf}/10^6 \text{ Btu}$).

F_c = Ratio of the volume of CO₂ produced to the gross calorific value of the fuel from Method 19, dsm^3/J ($\text{dscf}/10^6 \text{ Btu}$).

- (2) Calculate the CO₂ correction factor for correcting measurement data to 15 percent oxygen, as follows: [40 CFR 63.6620(e)(2)(ii)]

$$X_{\text{CO}_2} = \frac{5.9}{F_o} \quad (\text{Eq. 3})$$

Where: X_{CO_2} = CO₂ correction factor, percent.

5.9 = 20.9 percent O₂-15 percent O₂, the defined O₂ correction value, percent.

- (3) Calculate the NO_x and SO₂ gas concentrations adjusted to 15 percent O₂ using CO₂ as follows: [40 CFR 63.6620(e)(2)(iii)]

$$C_{\text{adj.}} = C_d \frac{X_{\text{CO}_2}}{\% \text{CO}_2} \quad (\text{Eq. 4})$$

Where: %CO₂ = Measured CO₂ concentration measured, dry basis, percent.
Where: Cd = Measured pollutant concentration (carbon monoxide) on a dry basis.

- (h) The engine percent load during a performance test shall be determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load in a specific application. A written report of the average percent load determination shall be included in the notification of compliance status. The following information shall be included in the written report: the engine model number, the engine manufacturer, the year of purchase, the manufacturer's site-rated brake horsepower, the ambient temperature, pressure, and humidity during the performance test, and all assumptions that were made to estimate or calculate percent load during the performance test shall be clearly explained. Measurement devices such as flow meters, kilowatt meters, beta analyzers, stain gauges, etc. that are used, the model number of the measurement device, and an estimate of its accurate in percentage of true value shall be provided. [40 CFR 63.6620(h)]

D.3.12 Continuous Compliance Demonstration Provisions Relating to National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63.6630]

- (a) The Permittee shall demonstrate continuous compliance with each applicable emission and operating limitation according to the following methods: [40 CFR 63.6640(a)]
- (1) Conduct semi-annual performance tests for CO to demonstrate that the required CO percent reduction is achieved; [40 CFR 63, Subpart ZZZZ, Table 6(1)(a)(i)] and
 - (2) Collect the catalyst inlet temperature data according to 63.6625(b); [40 CFR 63, Subpart ZZZ, table 6(1)(a)(ii)] and
 - (3) Reduce these data to 4-hour rolling averages. [40 CFR 63, Subpart ZZZZ, Table 6(1)(a)(iii)]
 - (4) Maintain the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature [40 CFR 63, Subpart ZZZZ, Table 6(1)(a)(iv)]
 - (5) Measure the pressure drop across the catalyst once per month and demonstrate that the pressure drop across the catalyst is within the operating limitation established during the performance test. [40 CFR 63, Subpart ZZZZ, Table 6(1)(a)(v)]
- (b) The Permittee shall report each instance in which applicable emission limitation or operating limitation in 40 CFR 63, Subpart ZZZZ Tables 2a and 2b were not met. These instances are deviations from the emission and operating limitations in 40 CFR 63, Subpart ZZZZ. These deviations must be reported according to the requirements in Sec. 63.6650. [40 CFR 63.6640(a)]
- (c) Upon changing the catalyst, the Permittee shall reestablish the values of the operating parameters measured during the initial performance test. When the Permittee reestablishes the values of the operating parameters, the Permittee shall also conduct a performance test to demonstrate that the Permittee is meeting the required emission limitation applicable to the stationary RICE (E09). [40 CFR 63.6640(b)]
- (d) Consistent with 40 CFR 63.6(e) and 63.7(e)(1), deviations from the emission or operating limitations that occur during a period of startup, shutdown, or malfunction are not violations if the Permittee demonstrates to the IDEM, OAQ's satisfaction that the Permittee was operating in accordance with the startup, shutdown, and malfunction plan. For new, reconstructed, and rebuilt stationary RICE, deviations from the emission or

operating limitations that occur during the first 200 hours of operation from engine startup (engine burn-in period) are not violations. [40 CFR 63.6640(d)]

- (e) The Permittee shall report each instance in which the applicable requirements of 40 CFR 63, Subpart ZZZZ, Table 8, are not met. [40CFR 63.6640(e)]

D.3.13 Initial Compliance Requirements Relating to National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63.6630]

- (a) Pursuant to 40 CFR 63.6630(a), the Permittee shall demonstrate initial compliance with each emission and operating limitation listed in D.2.3 according to Table 5 of 40 CFR 63, Subpart ZZZZ,. The Permittee has demonstrated initial compliance when:
 - (1) The average reduction of emissions of CO determined from the initial performance test achieves the required CO percent reduction. [40 CFR 63, Subpart ZZZZ, Table 5(1)(a)(i)]
 - (2) The Permittee has installed a continuous parametric monitoring system (CPMS) to continuously monitor the oxidation catalyst inlet temperature according to the requirements in 40 CFR 63.6625(b). [40 CFR 63, Subpart ZZZZ, Table 5(1)(a)(ii)]
 - (3) The Permittee has recorded the oxidation catalyst pressure drop and the oxidation catalyst inlet temperature during the initial performance test. [40 CFR 63, Subpart ZZZZ, Table 5(1)(a)(iii)]
- (b) The Permittee shall establish each applicable operating limitation in Table 2b of 40 CFR 63, Subpart ZZZZ, during the initial performance test. [40 CFR 63.6630(b)]
- (c) The Permittee shall submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in 40 CFR 63.6645. [40 CFR 63.6630(c)]

Compliance Monitoring Requirements

D.3.14 Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no monitoring requirements applicable to this facility.

Notification, Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] [40 CFR 63, Subpart ZZZZ]

D.3.15 Notification, Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- (a) To document compliance with Conditions D.2.7 Particulate [326 IAC 6-1-2], the Permittee shall maintain records documenting that all combustion facilities fired only natural gas.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.16 Notification Requirements Relating to National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ][326 IAC 2-7-1(34)]

- (a) The Permittee shall submit the notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b) through (e), and (g) and (h), that apply to the Stationary RICR (E09) by the dates specified. [40 CFR 63.6645(a)]
- (b) The Permittee shall submit an Initial Notification not later than 120 days after startup [40 CFR 63.6645(c)]
- (c) The Permittee shall submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required by 40 CFR 63.7(b)(1). [40 CFR 63.6645(e)]

- (d) The Permittee shall submit a Notification of Compliance Status containing the information required by 40 CFR 63.9(h)(2)(ii). [40 CFR 63.6645(f)]
- (1) For each initial compliance demonstration required in 40 CFR 63, Subpart ZZZZ, Table 5, that does not include a performance test, the Permittee shall submit the Notification of Compliance Status before the close of business on the 30th day following the completion of the initial compliance demonstration [40 CFR 63.6645(e)(1)]
- (2) For each initial compliance demonstration required in 40 CFR 63, Subpart ZZZZ, Table 5, that includes a performance test conducting according to the requirements in 40 CFR, Subpart ZZZZ, Table 4, the Permittee shall submit the Notification of Compliance Status before the close of business on the 60th day following the completion of the performance test according to 40 CFR 63.10(d)(2). [40 CFR 63.6645(e)(2)]
- (e) The required notifications shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (f) The Notifications require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.3.17 Report Requirements Relating to National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

- (a) The Permittee shall submit each applicable report in 40 CFR 63, Subpart ZZZZ, Table 7. [40CFR 63.6650(a)]
- (b) The Permittee shall submit the each report by the date in 40 CFR 63, Subpart ZZZZ, Table 7, in accordance with 40 CFR 63.6650(b)(1) through (5). [40 CFR 60.6650(b)]
- (1) The first Compliance report must cover the period beginning with startup of the Stationary RICE (E09) and ending on June 30, or December 31, whichever date is the first date following the end of the first calendar half after startup. [40 CFR 60.6650(b)(1)]
- The first Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after startup. [40 CFR 63.6650(b)(2)]
- (2) Each subsequent Compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period covering the period from July 1 through December 31. [40 CFR 63.6650(b)(3)]
- Each subsequent Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after startup. [40 CFR 63.6650(b)(4)]
- (c) The Compliance Reports shall contain the information required by 40 CFR 63.6650(c)(1) through (6). [40 CFR 63.6650(c)]
- (d) For each deviation from an emission or operating limitation that occurs for the Stationary RICE (E09), the Permittee shall include the information required by 40 CFR 63.6650(c)(1)

through (4) and (e)(1) through (12). [40 CFR 63.6650(e)]

- (e) The Permittee shall report all deviations as defined by 40 CFR 63, Subpart ZZZZ, in the semi-annual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). [40 CFR 63.6650(f)]
 - (1) If the Permittee submits a compliance report pursuant to Table 7 of 40 CFR 63, Subpart ZZZZ, along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any emission or operating limitation in 40 CFR 63, Subpart ZZZZ, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report.
 - (2) However, submission of a compliance report shall not otherwise affect any obligation the Permittee may have to report deviations from permit requirements to IDEM, OAQ.
- (f) The Compliance Reports required shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (g) The Compliance reports require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

D.3.18 Recordkeeping Requirements Relating to National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

- (a) The Permittee shall keep the records described in 40 CFR 63.6655(a)(1) through (a)(3), (b)(1) through (b)(3). [40 CFR 63.6655(a)]
- (b) The Permittee shall keep the records required in Table 6 of 40 CFR, Subpart ZZZZ, to show continuous compliance with each applicable emission or operating limitation. [40 CFR 63.6655(d)]
- (c) The Permittee’s records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1). [40 CFR 63.6660(a)]
- (d) The Permittee shall retain each record for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.6655(b)]
- (e) The Permittee shall keep each copy readily accessible in hard copy or electronic form on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 63.10(b)(1). The Permittee can keep the records off-site for the remaining 3 years. [40 CFR 63.6660(c)]

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Storage Tanks (TK004, TK005 and TK006)

(e) One (1) condensate storage tank, identified as TK004, installed in 1972, capacity: 10,000 gallons.

Insignificant Activity

(n) Ethylene glycol (Ambitol) storage tanks, including the following:

(1) One (1) tank, identified as TK005, installed in 1965, capacity: 12,000 gallons; and

(2) One (1) tank, identified as TK006, installed in 1965, capacity: 500 gallons. [326 IAC 8-9]

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

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-9]

Pursuant to 326 IAC 8-9-1(b), the Permittee shall maintain a record and submit to the department a report containing the following information for each vessel:

(a) The vessel identification number.

(b) The vessel dimensions.

(c) The vessel capacity.

These records shall be maintained for the life of the vessel.

SECTION D.5

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 million (10,000,000) British thermal units per hour, including:
 - (1) One (1) boiler, constructed on April 5, 1972, heat input capacity: 5.021 million British thermal units per hour. [326 IAC 6.8]
 - (2) Space heaters, heat input capacity: less than 2 million British thermal units per hour, total. [326 IAC 6.8]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including:
 - One (1) cold cleaner equipped with a remote solvent reservoir, constructed on March 25, 2002. [326 IAC 8-3-2]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.8]

(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.5.1 Particulate [326 IAC 6.8]

- (a) Pursuant to 326 IAC 6.8-1-2(a), particulate emission rate from the space heaters and welding operations shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three hundredths (0.03) grain per dry standard cubic foot (dscf)).
- (b) Pursuant to 326 IAC 6.8-1-2(b), particulate emission rate from the one (1) insignificant boiler shall not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf).

D.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and do not dispose of waste solvent or

transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: ANR Pipeline Company - St. John Station
Source Address: 10313 White Oak Avenue, St. John, Indiana 46373
Mailing Address: EH&S- Air Group, P.O. Box 2446, Houston, Texas 77252-2446
Part 70 Permit No.: T 089-17532-00069

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: ANR Pipeline Company - St. John Station
Source Address: 10313 White Oak Avenue, St. John, Indiana 46373
Mailing Address: EH&S- Air Group, P.O. Box 2446, Houston, Texas 77252-2446
Part 70 Permit No.: T 089-17532-00069

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/>	This is an emergency as defined in 326 IAC 2-7-1(12)
X	The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
X	The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: ANR Pipeline Company - St. John Station
Source Address: 10313 White Oak Avenue, St. John, Indiana 46373
Mailing Address: EH&S- Air Group, P.O. Box 2446, Houston, Texas 77252-2446
Part 70 Permit No.: T 089-17532-00069
Facility: One (1) generator, identified as G08
Parameter: Hours of operation
Limit: No more than 3,000 hours per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Hours of Operation	Hours of Operation	Hours of Operation
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete 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: ANR Pipeline Company - St. John Station
 Source Address: 10313 White Oak Avenue, St. John, Indiana 46373
 Mailing Address: EH&S- Air Group, P.O. Box 2446, Houston, Texas 77252-2446
 Part 70 Permit No.: T 089-17532-00069

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

<p>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".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality
and IDEM Northwest Regional Office**

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

Source Background and Description
--

Source Name:	ANR Pipeline Company - St. John Station
Source Location:	10313 White Oak Avenue, St. John, Indiana 46373
County:	Lake
SIC Code:	4922
Permit Renewal No.:	T 089-17532-00069
Permit Reviewer:	Brandon Snoddy

On August 15, 2008, the Office of Air Quality (OAQ) had a notice published in Gary Post Tribune, Merrillville, Indiana, stating that ANR Pipeline Company had applied for a Part 70 Operating Permit renewal. The notice also stated that the OAQ proposed to issue a Part 70 operating 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.

Additional Changes

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

County Attainment Status

- (a) ~~Lake County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.~~

U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Lake County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM_{2.5} promulgated on May 8th, 2008, and effective on July 15th 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

As indicated in the tables on page 6 and page 8 in the TSD, PM₁₀, (as a surrogate for PM_{2.5}) is below Emission Offset [326 IAC 2-2] thresholds. Therefore, there are no changes to the permit.

IDEM Contact

- (a) Questions regarding this proposed Part 70 Operating Permit can be directed to Brandon Snoddy at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 232-8217 or toll free at 1-800-451-6027 extension 2-8217.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Indiana Department of Environmental Management
Office of Air Quality
and IDEM Northwest Regional Office

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

Source Background and Description

Source Name: ANR Pipeline Company - St. John Station
Source Location: 10313 White Oak Avenue, St. John, Indiana 46373
County: Lake
SIC Code: 4922
Permit Renewal No.: T 089-17532-00069
Permit Reviewer: Brandon Snoddy

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from ANR Pipeline Company - St. John Station relating to the operation of a natural gas compressor station.

History

On February 5, 2003, ANR Pipeline Company - St. John Station submitted an application to the OAQ requesting to renew its operating permit. ANR Pipeline Company - St. John Station was issued a Part 70 Operating Permit (T 089-6245-00069) on November 12, 1998.

Permitted Emission Units and Pollution Control Equipment

- (a) Four (4) natural gas-fired, spark ignition, two-stroke, lean burn, reciprocating internal combustion engine compressors, identified as E01 through E04, installed in 1951, and exhausting to stacks S01 through S04, respectively, with an output capacity of 1,550 horsepower, each, and a heat input capacity of 12.66 million British thermal units per hour, each.
- (b) Two (2) natural gas-fired, spark ignition, two-stroke, lean burn, reciprocating internal combustion engine compressors, identified as E06 and E07, installed in 1972 and 1973, and exhausting to stacks S06 and S07, respectively, equipped with Low Emission Combustion (LEC) technology, with an output capacity of 12,000 horsepower, each, and a heat input capacity of 89.86 million British thermal units per hour, each.
- (c) One (1) intermittent use, natural gas-fired, spark ignition, four-stroke, lean burn generator, identified as G08, installed in 1995, and exhausting to stack S08, with an output capacity of 825 horsepower, and a heat input capacity of 6.0 million British thermal units per hour.
- (d) One (1) natural gas-fired, spark ignition, four-stroke, lean burn reciprocating internal combustion engine compressor, identified as E09, installed in 2005, and exhausting to stack S09, equipped with an oxidation catalyst, identified as C09, to control CO and HAP emissions, with an output capacity of 2,000 horsepower, and a heat input capacity of 15.6 million British thermal units per hour.
- (e) One (1) condensate storage tank, identified as TK004, installed in 1972, capacity: 10,000 gallons.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

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

Emission Units and Pollution Control Equipment Removed From the Source

No emission units have been removed from this source since the initial Part 70 Operating Permit was issued.

Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:
 - (1) One (1) boiler, constructed on April 5, 1972, heat input capacity: 5.021 million British thermal units per hour. [326 IAC 6.8]
 - (2) Space heaters, heat input capacity: less than 2 million British thermal units per hour, total. [326 IAC 6.8]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including:
 - (1) One (1) cold cleaner equipped with a remote solvent reservoir, constructed on March 25, 2002. [326 IAC 8-3-2]
 - (2) One (1) enclosed heated cleaner, constructed in April 2004, using a cleaner that is solid at standard conditions.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.8]
- (d) Ethylene glycol (Ambitrol) storage tanks, including the following:
 - (1) One (1) tank, identified as TK005, installed in 1965, capacity: 12,000 gallons; and
 - (2) One (1) tank, identified as TK006, installed in 1965, capacity: 500 gallons. [326 IAC 8-9]
- (e) The following VOC and HAP storage containers:

Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (f) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (g) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (h) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (i) Stockpiled soils from soil remediation activities that are covered and waiting transportation for disposal.
- (j) Paved roads and parking lots with public access. [326 IAC 6-4]
- (k) Asbestos abatement projects regulated by 326 IAC 14-10.

- (l) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (m) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (n) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

Existing Approvals

Since the issuance of the Part 70 Operating Permit (T 089-6245-00069) on November 12, 1998, the source has constructed or has been operating under the following approvals as well:

- (a) Significant Source Modification 089-11347-00069, issued on January 19, 2000;
- (b) Administrative Amendment 089-11359-00069, issued on January 21, 2000;
- (c) Reopening 089-13357-00069, issued on December 31, 2001;
- (d) Administrative Amendment 089-14589-00069, issued on April 5, 2002;
- (e) Minor Source Modification 089-20366-00069, issued on December 23, 2004;
- (f) Administrative Amendment 089-19920-00069, issued on January 31, 2005;
- (g) Significant Permit Modification 089-20476-00069, issued on July 1, 2005;
- (h) Administrative Amendment 089-21973-00069, issued on December 2, 2005;
- (i) Significant Permit Modification 089-23456-00069, issued on January 22, 2008.

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

The following terms and conditions from previous approvals have been revised in this Part 70 Operating Permit Renewal:

Condition D.1.3, Emission Offset [326 IAC 2-3]:

The hours of operation of the 825 HP intermittent use generator shall not exceed 3,000 hours per twelve (12) consecutive month period. Therefore, pursuant to 326 IAC 2-3, the emission offset requirements do not apply. Any change or modification which may increase the potential emissions to 25 tons per year of NO_x must be approved by the Office of Air Quality before any such change may occur.

Reason revised: The generator is still limited to 3,000 hours of use. However, due to a change in the NO_x emission factor, the calculated potential to emit from the generator is now 36.7 tons per year, instead of 25.0 tons per year, when operating 3,000 hours per year. However, this is a severe nonattainment county for ozone based on the 1-hour standard, and the significance level for NO_x is 40 tons per year. Therefore, the statement "any change or modification which may increase the potential emissions to 25 tons per year of NO_x must be approved by the Office of Air Quality before any such change may occur" is not included in the permit because the potential

emissions are greater than twenty-five (25) tons per year, and the Permittee is not in violation of any rule.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S01	Reciprocating internal combustion internal engine compressor (E01)	20	1.33	6,144	800
S02	Reciprocating internal combustion internal engine compressor (E02)	20	1.33	6,144	800
S03	Reciprocating internal combustion internal engine compressor (E03)	20	1.33	6,144	800
S04	Reciprocating internal combustion internal engine compressor (E04)	20	1.33	6,144	800
S06	Reciprocating internal combustion internal engine compressor (E05)	73.5	6.5	47,525	800
S07	Reciprocating internal combustion internal engine compressor (E06)	73.5	6.5	47,525	800
S08	Generator (G08)	25	1.67	5,871	800
S09	Reciprocating internal combustion internal engine compressor (E09)	21	1.7	6,144	800

Emission Calculations

See Appendix A of this document for detailed emission calculations. The emissions from Tank TK004 were calculated in the initial Part 70 permit application and are 0.129 tons per year of VOC and 0.039 tons per year of HAPs, total, using EPA's TANKS 4.0.9d program.

County Attainment Status

The source is located in Lake County

Pollutant	Status
PM ₁₀	attainment
PM _{2.5}	nonattainment
SO ₂	attainment
NO _x	attainment
8-hour Ozone	moderate nonattainment
CO	attainment
Lead	attainment

- (a) Lake County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (b) 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.
- (1) On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the 8-hour National Ambient Air quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Lake County was previously designated as a severe nonattainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.
- On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NO_x threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Therefore, VOC emissions were reviewed pursuant to the requirements for nonattainment new source review. See the State Rule Applicability for the source section.
- (2) VOC and NO_x emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.
- (c) Lake County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 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 or Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	43.75
PM ₁₀	54.68
SO ₂	2.65
VOC	142.37
CO	693.66
NO _x	2,739.67

HAPs	tons/year
1,1,2,2-Tetrachloroethane	0.073
1,1,2-Trichloroethane	0.058
1,3-Butadiene	0.852
1,3-Dichloropropene	0.047
2,2,4-Trimethylpentane	0.877
Acetaldehyde	8.62
Acrolein	8.33
Benzene	2.00
Biphenyl	0.024
Carbon Tetrachloride	0.065
Chlorobenzene	0.048
Chloroform	0.050
Ethylbenzene	0.119
Ethylene Dibromide	0.078
Formaldehyde	60.7
Methanol	2.74
Methylene Chloride	0.150
n-Hexane	0.617
Naphthalene	0.104
Phenol	0.045
Styrene	0.058
Toluene	1.02
Vinyl Chloride	0.026
Xylene	0.294
Ethylene Glycol	2.0
Total	88.99

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of NO_x and CO is equal to or greater than one hundred (100) tons per year, and the potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than one hundred (<100) tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	not reported
PM ₁₀	14
SO ₂	0
VOC	96
CO	246
NO _x	855
HAPs	not reported

Part 70 Permit Conditions

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

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

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Six (6) engine compressors (E01 - E04, E06 and E07)	38.74	48.74	0.590	90.35	422.82	1931.40	55.7 individual (formaldehyde); 80.1 total
One (1) generator (E08)	0.001	0.090	0.005	1.06	3.47	36.7	0.475 individual (formaldehyde); 0.649 total
One (1) engine compressor (E09)	0.005	0.682	0.040	8.06	21.66	24.1	3.61 individual (formaldehyde); 4.93 total
Condensate storage tank (TK004)	0.00	0.00	0.00	0.129	0.00	0.00	0.013 individual (hexane); 0.037 total
Insignificant Activities (Conservatively estimated emissions from combustion, welding, degreasing and storage tanks)	5.00	5.00	2.00	10.0	5.00	5.00	2.00 individual (ethylene glycol); 2.06 total
Total	43.75	54.51	2.64	109.60	452.95	1997.26	59.8 individual (formaldehyde); 87.8 total
Major Source Threshold	100	100	100	100	100	100	-

- (a) This existing stationary source is major for PSD because the emissions of at least one attainment pollutant (CO) are greater than two hundred fifty (>250) tons per year, and is not one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is major for Emission Offset because the emissions of the nonattainment pollutants (VOC and NO_x) are greater than one hundred (>100) tons per year.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

The following federal rules are applicable to the source:

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to a pollutant-specific emission unit that meets the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The six (6) two-stroke, lean burn engines, identified as E01 through E04, E06 and E07, each have potential NO_x and CO emissions greater than one hundred (100) tons per year. However, the six (6) engines do not use a control device to comply with any emission limitations or standards at this time. Therefore, the requirements of 40 CFR 64, CAM, are not included in this permit.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (c) The requirements of 40 CFR 60, Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971, are not included in the permit. The one (1) insignificant boiler has a heat input capacity less than 250 million British thermal units per hour.
- (d) The requirements of 40 CFR 60 Subparts Da, Db and Dc are not included in the permit for this source. Construction of the one (1) insignificant boiler commenced prior to September 18, 1978.
- (e) The requirements of 40 CFR 60 Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978, are not included in the permit for this source. Construction of the one (1) condensate storage tank, identified as T06, commenced prior to June 11, 1973, and the construction of all other tanks commenced after May 19, 1978.
- (f) The requirements of 40 CFR 60 Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, are not included in the permit for this source. Construction of the one (1) condensate storage tank, identified as TK004, and the two (2) ethylene glycol storage tanks, identified as TK005 and TK006, commenced prior to May 19, 1978.
- (g) The requirements of 40 CFR 60 Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, are not included in the permit for this source. Construction of the one (1) condensate storage tank, identified as TK004, and the two (2) ethylene glycol storage tanks, identified as TK005 and TK006, commenced prior to July 23, 1984.
- (h) The requirements of 40 CFR 60.330, Subpart GG, Standards of Performance for Stationary Gas Turbines, are not included in the permit for this source because the engines are reciprocating engines, not turbine engines.
- (i) The requirements of 40 CFR 60.630, Subpart KKK, Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants, are not included in the permit for this compressor station because the compressor station is not located at a natural gas processing plant. Therefore, pursuant to 40 CFR 60.630(e), it is exempt from this rule.
- (j) The requirements of 40 CFR 63, Subpart T, National Emissions Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning, are not included in the permit for this source. The degreaser does not use halogenated solvents in concentrations greater than five percent (5%) by weight.

- (k) The requirements of 40 CFR 63.760, Subpart HH, National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities, are not included in the permit for this source because the compressor station is part of the natural gas transmission and the compressors are not located at a natural gas processing plant.
- (l) The requirements of 40 CFR 63.1270, Subpart HHH, National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities, are not included in the permit for this source because this source does not contain a glycol dehydration unit. Pursuant to 40 CFR 60.1270(b), the affected source is a glycol dehydration unit. Pursuant to 40 CFR 60.1270(c), a facility that does not contain an affected source is not subject to the requirements of this rule.
- (m) The requirements of 40 CFR 63.2330, Subpart EEEE, National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline), are not included in the permit for this source. Pursuant to 40 CFR 63.2334(c)(2), organic liquid distribution operations do not include the activities and equipment, including product loading racks, used to process, store, or transfer organic liquids at natural gas transmission and storage facilities, as the term "facility" is defined in 40 CFR 63.1271 of Subpart HHH. This source is considered a natural gas transmission facility as defined in 40 CFR 63.1271.
- (n) The requirements of the National Emission Standard for Hazardous Air Pollutants, 326 IAC 20 (40 CFR 63.330, Subpart YYYY), are not included in the permit for this source because the engines at this source are reciprocating engines, not turbine engines.
- (o) The requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR 63, Subpart ZZZZ are not included in the permit for the six (6) two-stroke, lean burn engines, identified as E01 through E04, E06 and E07, and the one (1) intermittent use generator, identified as G08. The units are existing spark ignition two or four-stroke reciprocating internal combustion engines, as defined by 40 CFR 63.6675, at a major source of HAPs. However, pursuant to 40 CFR 63.6590(b)(3), there are no applicable requirements from 40 CFR 63, Subpart ZZZZ and 40 CFR 63, Subpart A for existing spark ignition two-stroke and four-stroke, lean burn, reciprocating internal combustion engines. Pursuant to 40 CFR 63.6590(a)(1), a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before December 19, 2002. These engines were all constructed prior to December 19, 2002.
- (p) The requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR 63, Subpart ZZZZ, which are incorporated by reference by 326 IAC 20-82, are included in the permit for the one (1) four-stroke, lean burn reciprocating internal combustion engine compressor, identified as E09, because it is a new engine pursuant to 40 CFR 63.6590(a)(2). The unit is an existing emergency stationary RICE, as defined by 40 CFR 63.6675, at a major source of HAPs. The engine uses an oxidation catalyst, with a 96.7% CO control efficiency according to the latest compliance stack test, to comply with the requirements of the rule. Nonapplicable portions of the NESHAP will not be included in the permit. The one (1) four-stroke, lean burn reciprocating internal combustion engine compressor, identified as E09 is subject to the following portions of 40 CFR 63, Subpart ZZZZ:
 - (1) 40 CFR 63.6580
 - (2) 40 CFR 63.6585
 - (3) 40 CFR 63.6590(a)(2)

- (4) 40 CFR 63.6595(a)(3) and (c)
 - (5) 40 CFR 63.6600(b)
 - (6) 40 CFR 63.6605
 - (7) 40 CFR 63.6610(a)
 - (8) 40 CFR 63.6615
 - (9) 40 CFR 63.6620(a) through (e) and (i)
 - (10) 40 CFR 63.6625(b)
 - (11) 40 CFR 63.6630
 - (12) 40 CFR 63.6635
 - (13) 40 CFR 63.6640 (a), (b), (d) and (e)
 - (14) 40 CFR 63.6645 (a), (c), (e) and (f)
 - (15) 40 CFR 63.6650 (a), (b), (c), (e) and (f)
 - (16) 40 CFR 63.6655 (a) and (b)
 - (17) 40 CFR 63.6660
 - (18) 40 CFR 63.6665
 - (19) 40 CFR 63.6670
 - (20) 40 CFR 63.6675
 - (21) Tables 2a, 2b, 3, 4, 5, 6, 7 and 8
- (q) The one (1) insignificant boiler would have been an affected source under National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD, because this source is a major source of HAPs. However, on June 8, 2007, the United States Court of appeals for the District of Columbia Circuit (in NRDC v. EPA, no. 04-1386) vacated in its entirety the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. Additionally, since the state rule at 326 IAC 20-95 incorporated the requirements of the NESHAP 40 CFR 63, Subpart DDDDD by reference, the requirements of 326 IAC 20-95 are no longer effective. Therefore, the requirements of 40 CFR 63, Subpart DDDDD and 326 IAC 20-95 are not included in the permit. In addition, this boiler is an existing, small gaseous fuel boiler, and would not have been subject to any requirements in Subpart DDDDD or Subpart A of Part 63 under the rule.

State Rule Applicability - Entire Source

326 IAC 2-1.1-5 (Nonattainment NSR)

Lake County is nonattainment for PM_{2.5}. PM₁₀ is considered a surrogate for PM_{2.5}. The unrestricted potential to emit PM₁₀ is less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-1.1-5, Nonattainment NSR, are not applicable.

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

This source is in an attainment county for all pollutants other than PM_{2.5} and ozone.

- (a) The potential to emit of CO is greater than two-hundred fifty (250) tons per year. This source is major for PSD purposes, however, the source was constructed prior to August 7, 1977. Therefore, PSD review was not required.
- (b) The one (1) intermittent use generator, identified as G08, and the one (1) engine compressor, identified as E09, and some insignificant degreasing operations were added to the source after August 7, 1977. These facilities have potential CO emissions less than one hundred (100) tons per year. Therefore, the additions of those facilities were minor modifications to an existing major source, pursuant to 326 IAC 2-2.

326 IAC 2-3 (Emission Offset)

- (a) This source was constructed in 1951, which is prior to the applicability date of 326 IAC 2-3. Therefore, it is not a new major source and the requirements of 326 IAC 2-3 are not applicable to the initial source.
- (b) The one (1) intermittent use generator, identified as G08, and the one (1) engine compressor, identified as E09, and some insignificant degreasing operations were added to the source after the applicability date of 326 IAC 2-3.
 - (1) These facilities have potential VOC emissions less than twenty-five (25) tons per year. The insignificant activities also have potential NO_x emissions less than forty (40) tons per year.
 - (2) The unrestricted potential NO_x emissions from the one (1) intermittent generator, identified as G08, are greater than forty (40) tons per year. Pursuant to Administrative Amendment 089-11359-00069, issued on January 21, 2000, the one (1) intermittent generator, identified as G08, shall not operate more than 3,000 hours per twelve (12) consecutive month period, with compliance determined at the end of each month. This limits the potential to emit NO_x to less than forty (40) tons per year using AP-42 emission factors (6.0 MMBtu/hr x 4.08 lbs/MMBtu x 3,000 hrs/yr x 1 ton/2,000 lbs = 36.7 tons/yr). Therefore, the addition of this facility was a minor modification to an existing major source, pursuant to 326 IAC 2-3.
 - (3) The unrestricted NO_x emissions from the one (1) engine compressor, identified as E09, are less than forty (40) tons per year based on the alternate emission factor. Pursuant to Minor Source Modification 089-20366-00069, issued on December 23, 2004, the potential to emit NO_x is limited to less than twenty-five (25) tons per year so that the modification was minor pursuant to 326 IAC 2-7-10.5, Part 70, Source Modification. Pursuant to the permit, NO_x emissions from the one (1) engine compressor, identified as E09, are limited to 0.000371 pounds per cubic foot of natural gas and the amount of natural gas used shall be less than 134,231,805 cubic feet per twelve (12) consecutive month period, with

compliance determined at the end of each month $((0.000371 \text{ lbs/cf} \times 134,231,805 \text{ cf/yr}) \times 1 \text{ ton}/2,000 \text{ lbs} < 25 \text{ tons/yr})$. Testing is required once every five (5) years. The latest test was conducted on April 6, 2006, and the source was found to be in compliance with this limitation.

326 IAC 2-4.1-1 (New source toxics control)

This source was initially constructed prior to July 27, 1997. The one (1) engine compressor, identified as E09, is the only significant emission unit constructed after July 27, 1997. The unrestricted potential HAP emissions from the one (1) engine compressor, identified as E09, are less than ten (10) tons of each individual HAP and twenty-five (25) tons of total HAPs per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7, Part 70. The potential to emit NO_x from the source is greater than 2,500 tons per year. Therefore, the source is required to submit an annual statement pursuant to 326 IAC 2-6-3(a)(1). The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in the 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.

This source is not in an area of Lake County that is subject to 326 IAC 5-1-2(2).

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Lake County is not listed by 326 IAC 6-5-1(a) and this source received all necessary preconstruction approvals by December 13, 1985. Therefore, the requirements of 326 IAC 6-5 are not applicable.

State Rule Applicability – Individual Facilities

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

This source is not listed in 326 IAC 6.8-2 through 6.8-11. However, actual emissions are greater than ten (10) tons per year of PM. Therefore, the source is subject to the requirements of 326 IAC 6.8-1-2.

- (a) Pursuant to 326 IAC 6.8-1-2(a), particulate matter emissions from the seven (7) engine compressors, identified as E01 through E04, E06, E07, and E09, the one (1) generator, identified as G08, and the insignificant welding operations and space heating shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three hundredths (0.03) grain per dry standard cubic foot (dscf)).
- (b) Pursuant to 326 IAC 6.8-1-2(b), particulate matter emissions from the one (1) insignificant boiler shall not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf).
- (c) This source does not have the potential to emit five (5) tons per year or more of fugitive particulate matter. Therefore, the requirements of 326 IAC 6.8-10 are not applicable.

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

Pursuant to 326 IAC 6-2-1(e), if any limitation established by this rule is inconsistent with applicable limitations contained in 326 IAC 6.5 and 326 IAC 6.8, then the limitations contained in 326 IAC 6.5 and 326 IAC 6.8 prevail. The one (1) insignificant boiler is limited by 326 IAC 6.8. Therefore, the requirements of 326 IAC 6-2 are not applicable.

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

- (a) Pursuant to 326 IAC 6-3-1.5(2), the definition of a manufacturing process is "any single or series of actions, operations, or treatments in which a mechanical, physical, or chemical transformation of material occurs that emits, or has the potential to emit, particulate in the production of the product. The term includes transference, conveyance, or repair of a product." Natural gas is not considered a product for the purposes of this rule. Therefore, the requirements of 326 IAC 6-3 do not apply to the seven (7) engine compressors, identified as E01 through E04, E06, E07, and E09, and the one (1) generator, identified as G08. These facilities are regulated by 326 IAC 6.8.
- (b) The insignificant welding at this source does not use more than 625 pounds of weld wire or rod per day. Therefore, pursuant to 326 IAC 6-3-1(b)(9), the welding is exempt from the requirements of 326 IAC 6-3. The welding is regulated by 326 IAC 6.8.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The potential SO₂ emissions from the facilities at this source are less than ten (10) pounds per hour and twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 7-1.1 are not applicable.

326 IAC 8-1-6 (New facilities; General reduction requirements)

- (a) The six (6) engine compressors, identified as E01 through E04, E06 and E07, the one (1) condensate storage tank, identified as TK004, and the two (2) insignificant Ambientrol storage tanks, identified as TK005 and TK006, were constructed prior to January 1, 1980. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

- (b) The one (1) generator, identified as G08, and the one (1) engine compressor, identified as E09, were each constructed after January 1, 1980. The potential VOC emissions from each are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.
- (c) The potential VOC emissions from the two (2) insignificant degreasers constructed after January 1, 1980 are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

- (a) The one (1) insignificant cold cleaner degreaser, was constructed in 2002 and is equipped with a remote solvent reservoir. Therefore, the degreaser is subject to the requirements of 326 IAC 8-3-2, but not 326 IAC 8-3-5. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:
 - (1) Equip the cleaner with a cover;
 - (2) Equip the cleaner with a facility for draining cleaned parts;
 - (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label summarizing the operation requirements;
 - (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
- (b) Although the cleaner used in the one (1) insignificant, enclosed heated cleaner uses a cleaner that contains up to five percent (5%) VOC, the cleaning agent is not considered a solvent. A solvent is defined by 326 IAC 1-2-72 as organic materials which are liquid at standard conditions and which are used as dissolvers, viscosity reducers, or cleaning agents. The cleaning agent is a solid at standard conditions. Therefore, the one (1) insignificant, enclosed heated cleaner is not an organic solvent degreasing operation and the requirements of 326 IAC 8-3 are not applicable.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source commenced operation prior to October 7, 1974. Therefore, the requirements of 326 IAC 8-6 are not applicable.

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

This source is in Lake County. Therefore, the one (1) condensate storage tank, identified as TK004, and the two (2) ethylene glycol (Ambitol) storage tanks, identified as TK005 and TK006, are subject to the requirements of 326 IAC 8-9. Each tank has a capacity less than 39,000 gallons. Pursuant to 326 IAC 8-9-1(b), stationary vessels with a capacity of less than thirty-nine thousand (39,000) gallons are subject to the reporting and record keeping provisions of 326 IAC 8-9-6(a) (b), and are exempt from all other provisions of this rule. Therefore, the Permittee shall maintain a record and submit to the department a report containing the following information for each vessel:

- (a) The vessel identification number.
- (b) The vessel dimensions.
- (c) The vessel capacity.

These records shall be maintained for the life of the vessel.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

This source commenced operation prior to March 21, 1972. Therefore, the requirements of 326 IAC 9-1 are not applicable.

326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties)

This source is not located in Clark or Floyd County. Therefore, the requirements of 326 IAC 10-1 are not applicable.

326 IAC 10-4 (Nitrogen Oxides Budget Trading Program)

- (a) The one (1) natural gas-fired, spark ignition, four-stroke, lean burn reciprocating internal combustion engine compressor, identified as E09, was constructed after January 1, 1997, in Lake County. The engine has a capacity less than 250 million British thermal units, and it does not produce electricity for sale. Therefore, pursuant to 326 IAC 10-4-2(27), this unit is not a large affected unit, and the requirements of 326 IAC 10-4 are not applicable.
- (b) All other engines at this source commenced operation prior to January 1, 1997, and have heat input capacities less than 250 million British thermal units per hour. Therefore, pursuant to 326 IAC 10-4-2(27), the units are not large affected units, and the requirements of 326 IAC 10-4 are not applicable.

326 IAC 10-5 (Nitrogen Oxide Reduction Program for Internal Combustion Engines (ICE))

The two (2) engine compressors, identified as E06 and E07, are considered large SIP call engines. Pursuant to 326 IAC 10-5-3, after May 1, 2007, an owner or operator of a large NO_x SIP Call engine shall not operate the engine in the period May 1 through September 30 of 2007, and any subsequent year unless the owner or operator complies with the requirements of a compliance plan that meets the following provisions:

- (a) The compliance plan must:
 - (1) be approved by the department; and
 - (2) demonstrate enforceable emission reductions from one (1) or more stationary internal combustion engines equal to or higher than the facility seasonal NO_x 2007 tonnage reduction.
- (b) The compliance plan must cover some or all engines at:
 - (1) an individual facility;
 - (2) several facilities; or
 - (3) all facilities in the state that are in control of the same owner or operator.

- (c) The compliance plan was submitted to the IDEM OAQ on October 19, 2007. The compliance plan was approved and has been incorporated.
- (d) The compliance plan may include credit for decreases in NO_x emissions from large NO_x SIP Call engines due to NO_x control equipment. Credit may also be included for decreases in NO_x emissions from other engines due to NO_x control equipment not reflected in the 2007 ozone season base NO_x emissions in the NO_x SIP Call engine inventory.
- (e) The compliance plan must include the following items:
 - (1) A list of affected engines subject to the plan, including the engine's:
 - (A) manufacturer;
 - (B) model;
 - (C) facility location address; and
 - (D) facility identification number.
 - (2) The projected ozone season hours of operation for each engine and supporting documentation.
 - (3) A description of the NO_x emissions control installed, or to be installed, on each engine and documentation to support projected NO_x emission rates.
 - (4) The past and projected NO_x emission rates for each affected engine in grams per brake horsepower per hour (g/bhphr).
 - (5) A numerical demonstration that the emission reductions obtained from all engines included under the plan will be equivalent to or greater than the owner or operator's facility seasonal NO_x 2007 tonnage reduction, based on the difference between the:
 - (A) past NO_x emission rate; and
 - (B) projected NO_x emission rate;multiplied by the projected operating hours for each affected engine and taking into account any credit under subdivision (4).
 - (6) Provisions for monitoring including the frequency of the monitoring, as specified in section 4 of this rule.
 - (7) Reporting and record keeping as specified in section 5 of this rule.

On August 2, 2006, ANR Pipeline submitted a plan for all of their facilities in Indiana. The plan included reductions for Celestine Station (plant ID 037-00031), St. John Station (plant ID 089-00069) and Shelbyville Station (plant ID 145-00011). The emission limitations, compliance monitoring requirements with respect to the compliance are incorporated into their respective Part 70 Operating Permits.

Testing Requirements

On or prior to April 6, 2011 (5 years after the most recent test), in order to demonstrate compliance with the NO_x emission limit in the permit, the Permittee shall perform NO_x testing for the one (1) engine compressor, identified as E09, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The one (1) engine compressor, identified as E09, has applicable compliance monitoring conditions as specified below:

The one (1) engine compressor, identified as E09, must comply with the compliance monitoring requirements of 40 CFR 63, Subpart ZZZZ, incorporated by reference by 326 IAC 20-82, as described in the permit.

These monitoring conditions are necessary because the one (1) engine compressor, identified as E09, including the oxidation catalyst, must operate properly to ensure compliance with 326 IAC 20-82, 40 CFR 63, Subpart ZZZZ, and 326 IAC 2-7.

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal 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 application for the purposes of this review was received on February 5, 2003. Additional information was received on May 23, 2006.

Conclusion

The operation of this compressor station shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T 089-17532-00069.

**Appendix A: Emission Calculations
Natural Gas-fired Reciprocating Engines**

**Company Name: ANR Pipeline Company - St. John Station
Address City IN Zip: 10313 White Oak Avenue, St. John, Indiana 46373
Part 70 Permit No.: T 089-17532-00069
Reviewer: Brandon Snoddy
Date: May 21, 2008**

E01, E02, E03 and E04

Two stroke Lean Burn Engines
Heat Input Capacity MMBtu/hr
4 @ 12.66 MMBtu/hr

50.6

Emission Factor	Pollutant					
	PM 3.84E-02 lb/MMBtu	PM10 4.83E-02 lb/MMBtu	SO2 5.88E-04 lb/MMBtu	NOx 3.17E+00 lb/MMBtu	VOC 1.20E-01 lb/MMBtu	CO 3.86E-01 lb/MMBtu
Potential Emission in tons/yr	8.52	10.72	0.13	703.12	26.62	85.62

HAPs; E01 - E04	Emission Factor	Tons Per Year
1,1,2,2-Tetrachloroethane	6.63E-05	1.47E-02
1,1,2-Trichloroethane	5.27E-05	1.17E-02
1,3-Butadiene	8.20E-04	1.82E-01
1,3-Dichloropropene	4.38E-05	9.71E-03
2,2,4-Trimethylpentane	8.46E-04	1.87E-01
Acetaldehyde	7.76E-03	1.72E+00
Acrolein	7.78E-03	1.72E+00
Benzene	1.94E-03	4.30E-01
Biphenyl	3.95E-06	8.75E-04
Carbon Tetrachloride	6.07E-05	1.35E-02
Chlorobenzene	4.44E-05	9.84E-03
Chloroethane	1.87E-06	4.14E-04
Chloroform	4.71E-05	1.04E-02
Ethylbenzene	1.08E-04	2.39E-02
Ethylene Dibromide	7.34E-05	1.63E-02
Formaldehyde	5.52E-02	1.22E+01
Methanol	2.48E-03	5.50E-01
Methylene Chloride	1.47E-04	3.26E-02
n-Hexane	4.45E-04	9.86E-02
Naphthalene	9.63E-05	2.13E-02
Phenol	4.21E-05	9.33E-03
Styrene	5.48E-05	1.21E-02
Toluene	9.63E-04	2.13E-01
Vinyl Chloride	2.47E-05	5.47E-03
Xylene	2.68E-04	5.94E-02
Total HAPs:		17.59
Highest Single HAP Formaldehyde		12.20 Tons Per Year

Methodology

Emission Factors are from AP 42 Tables 3.2-1, 3.2-2 and 3.2-3, revised July 2000

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

**Appendix A: Emission Calculations
Natural Gas-fired Reciprocating Engines**

**Company Name: ANR Pipeline Company - St. John Station
Address City IN Zip: 10313 White Oak Avenue, St. John, Indiana 46373
Part 70 Permit No.: T 089-17532-00069
Reviewer: Brandon Snoddy
Date: May 21, 2008**

E06

Two stroke Lean Burn Engine	Uncontrolled
Heat Input Capacity MMBtu/hr	Rated Horsepower
89.86	12,000

Emission Factor	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	3.84E-02 lb/MMBtu	4.83E-02 lb/MMBtu	5.88E-04 lb/MMBtu	8.20 g/bhp-hr	0.12 lb/MMBtu	65.21 lb/hr
Potential Emission in tons/yr	15.11	19.01	0.23	950.18	47.23	285.62

E07

Two stroke Lean Burn Engine	Uncontrolled
Heat Input Capacity MMBtu/hr	Rated Horsepower
89.86	12,000

Emission Factor	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	3.84E-02 lb/MMBtu	4.83E-02 lb/MMBtu	5.88E-04 lb/MMBtu	8.20 g/bhp-hr	0.12 lb/MMBtu	65.21 lb/hr
Potential Emission in tons/yr	15.11	19.01	0.23	950.18	47.23	285.62

E06

Two stroke Lean Burn Engine	With LEC
Heat Input Capacity MMBtu/hr	Rated Horsepower
89.86	12,000

Emission Factor	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	3.84E-02 lb/MMBtu	4.83E-02 lb/MMBtu	5.88E-04 lb/MMBtu	5.30 g/bhp-hr	0.30 lb/MMBtu	1.47 g/bhp-hr
Potential Emission in tons/yr	15.11	19.01	0.23	614.14	34.76	170.34

E07

Two stroke Lean Burn Engine	With LEC
Heat Input Capacity MMBtu/hr	Rated Horsepower
89.86	12,000

Emission Factor	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	3.84E-02 lb/MMBtu	4.83E-02 lb/MMBtu	5.88E-04 lb/MMBtu	5.30 g/bhp-hr	0.25 g/bhp-hr	1.44 g/bhp-hr
Potential Emission in tons/yr	15.11	19.01	0.23	614.14	28.97	166.86

HAPs; E06,E07	Emission Factor	Tons Per Year
1,1,2,2-Tetrachloroethane	6.63E-05	5.22E-02
1,1,2-Trichloroethane	5.27E-05	4.15E-02
1,3-Butadiene	8.20E-04	6.45E-01
1,3-Dichloropropene	4.38E-05	3.45E-02
2,2,4-Trimethylpentane	8.46E-04	6.66E-01
Acetaldehyde	7.76E-03	6.11E+00
Acrolein	7.78E-03	6.12E+00
Benzene	1.94E-03	1.53E+00
Biphenyl	3.95E-06	3.11E-03
Carbon Tetrachloride	6.07E-05	4.78E-02
Chlorobenzene	4.44E-05	3.50E-02
Chloroethane	1.87E-06	1.47E-03
Chloroform	4.71E-05	3.71E-02

HAPs; E06,E07	Emission Factor	Tons Per Year
Ethylbenzene	1.08E-04	8.50E-02
Ethylene Dibromide	7.34E-05	5.78E-02
Formaldehyde	5.52E-02	4.35E+01
Methanol	2.48E-03	1.95E+00
Methylene Chloride	1.47E-04	1.16E-01
n-Hexane	4.45E-04	3.50E-01
Naphthalene	9.63E-05	7.58E-02
Phenol	4.21E-05	3.31E-02
Styrene	5.48E-05	4.31E-02
Toluene	9.63E-04	7.58E-01
Vinyl Chloride	2.47E-05	1.94E-02
Xylene	2.68E-04	2.11E-01
Total HAPs:		62.48
Highest Single HAP Acrolein		6.12 Tons Per Year

Methodology

Other Emission Factors are from AP 42 Tables 3.2-1, 3.2-2 and 3.2-3, revised July 2000
Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

**Appendix A: Emission Calculations
Natural Gas-fired Reciprocating Engines**

**Company Name: ANR Pipeline Company - St. John Station
Address City IN Zip: 10313 White Oak Avenue, St. John, Indiana 46373
Part 70 Permit No.: T 089-17532-00069
Reviewer: Brandon Snoddy
Date: May 21, 2008**

E09

Four stroke Lean Burn Engine
Heat Input Capacity
MM Btu/hr

15.6

Emission Factor in lb/MMBtu	Pollutant					
	PM 7.71E-05	PM10 9.99E-03	SO2 5.88E-04	NOx See below	VOC 1.18E-01	CO 3.17E-01
Potential Emission in tons/yr	0.005	0.682	0.040		8.06	21.7

NOx Emission Calculation based on IDEM validated emission factor. The Permittee tested for NOx in 2006.

Output Capacity (HP)	NOx Emission Factor (g/BHP-hr)	NOx Emissions (lbs/hr)	NOx Emissions (tons/yr)
2000	1.25	5.51	24.1

HAP	Emission Factor Four stroke lean burn (lb/MMBtu)	Potential to Emit (tons/yr)
1,1,2,2-Tetrachloroethane	4.00E-05	2.73E-03
1,1,2-Trichloroethane	3.18E-05	2.17E-03
1,3-Butadiene	2.67E-04	1.82E-02
1,3-Dichloropropene	2.64E-05	1.80E-03
2,2,4-Trimethylpentane	2.50E-04	1.71E-02
Acetaldehyde	8.36E-03	5.71E-01
Acrolein	5.14E-03	3.51E-01
Benzene	4.40E-04	3.01E-02
Biphenyl	2.12E-04	1.45E-02
Carbon Tetrachloride	3.67E-05	2.51E-03
Chlorobenzene	3.04E-05	2.08E-03
Chloroethane	1.87E-06	1.28E-04
Chloroform	2.85E-05	1.95E-03
Ethylbenzene	3.97E-05	2.71E-03
Ethylene Dibromide	4.43E-05	3.03E-03
Formaldehyde	5.28E-02	3.61E+00
Methanol	2.50E-03	1.71E-01
Methylene Chloride	2.00E-05	1.37E-03
n-Hexane	1.11E-03	7.58E-02
Naphthalene	7.44E-05	5.08E-03
Phenol	2.40E-05	1.64E-03
Styrene	2.36E-05	1.61E-03
Toluene	4.08E-04	2.79E-02
Vinyl Chloride	1.49E-05	1.02E-03
Xylene	1.84E-04	1.26E-02
Total HAPs:		4.93
Highest Single HAP		3.61
Formaldehyde		Tons Per Year

Methodology

NOx Vendor Guaranteed Emission Factor (grams/hp-hr) approved in the review for MSM 089-20366, issued on December 23, 2004.

Tests conducted in April 2006 showed that NOx emissions are less than the approved emission factor.

Other Emission Factors are from AP 42 Tables 3.2-1, 3.2-2 and 3.2-3, revised July 2000

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

**Appendix A: Emission Calculations
Natural Gas-fired Reciprocating Engines**

**Company Name: ANR Pipeline Company - St. John Station
Address City IN Zip: 10313 White Oak Avenue, St. John, Indiana 46373
Part 70 Permit No.: T 089-17532-00069
Reviewer: Brandon Snoddy
Date: May 21, 2008**

One (1) intermittent generator (G08)

Four stroke Lean Burn Engines
Heat Input Capacity
MM Btu/hr

6.0

Emission Factor in lb/MMBtu	Pollutant					
	PM 7.71E-05	PM10 9.98E-03	SO2 5.88E-04	NOx 4.08E+00	VOC 1.18E-01	CO 3.86E-01
Unrestricted Potential Emission in tons/yr	0.002	0.262	0.015	107.222	3.101	10.144
Limited Potential to Emit (3,000 hrs/yr) in tons/yr	0.001	0.090	0.005	36.720	1.062	3.474

HAP	Emission Factor Four stroke lean burn (lb/MMBtu)	Unrestricted Potential to Emit (tons/yr)	Limited Potential to Emit (tons/yr)
1,1,2,2-Tetrachloroethane	4.00E-05	1.05E-03	3.60E-04
1,1,2-Trichloroethane	3.18E-05	8.36E-04	2.86E-04
1,3-Butadiene	2.67E-04	7.02E-03	2.40E-03
1,3-Dichloropropene	2.64E-05	6.94E-04	2.38E-04
2,2,4-Trimethylpentane	2.50E-04	6.57E-03	2.25E-03
Acetaldehyde	8.36E-03	2.20E-01	7.52E-02
Acrolein	5.14E-03	1.35E-01	4.63E-02
Benzene	4.40E-04	1.16E-02	3.96E-03
Biphenyl	2.12E-04	5.57E-03	1.91E-03
Carbon Tetrachloride	3.67E-05	9.64E-04	3.30E-04
Chlorobenzene	3.04E-05	7.99E-04	2.74E-04
Chloroethane	1.87E-06	4.91E-05	1.68E-05
Chloroform	2.85E-05	7.49E-04	2.57E-04
Ethylbenzene	3.97E-05	1.04E-03	3.57E-04
Ethylene Dibromide	4.43E-05	1.16E-03	3.99E-04
Formaldehyde	5.28E-02	1.39E+00	4.75E-01
Methanol	2.50E-03	6.57E-02	2.25E-02
Methylene Chloride	2.00E-05	5.26E-04	1.80E-04
n-Hexane	1.11E-03	2.92E-02	9.99E-03
Naphthalene	7.44E-05	1.96E-03	6.70E-04
Phenol	2.40E-05	6.31E-04	2.16E-04
Styrene	2.36E-05	6.20E-04	2.12E-04
Toluene	4.08E-04	1.07E-02	3.67E-03
Vinyl Chloride	1.49E-05	3.92E-04	1.34E-04
Xylene	1.84E-04	4.84E-03	1.66E-03
	Total HAPs:	1.89	0.649
	Highest Single HAP	1.39	0.475
	Formaldehyde	Tons Per Year	Tons Per Year

Methodology

Emission Factors are from AP 42 Tables 3.2-1, 3.2-2 and 3.2-3, revised July 2000

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

Appendix A: Emission Calculations
Total Emissions Summary: Unrestricted Potential to Emit

Company Name: ANR Pipeline Company - St. John Station
Address City IN Zip: 10313 White Oak Avenue, St. John, Indiana 46373
Part 70 Permit No.: T 089-17532-00069
Reviewer: Brandon Snoddy
Date: May 21, 2008

Unrestricted Potential Emissions (tons/yr)

Facility	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Four (4) engine compressors (E01 - E04)	8.52	10.72	0.13	703.12	26.62	85.62
Two (2) engine compressors (E06, E07)	30.22	38.02	0.460	1900.18	94.46	571.24
One (1) generator (E08)	0.00	0.26	0.015	107.2	3.10	10.1
One (1) engine compressor (E09)	0.005	0.682	0.040	24.1	8.06	21.7
Condensate storage tank (TK004)	0.00	0.00	0.00	0.00	0.129	0.00
Insignificant Activities (Conservatively estimated emissions from combustion, welding, degreasing and storage tanks)	5.00	5.00	2.00	5.00	10.0	5.00
Total	43.75	54.68	2.65	2739.67	142.37	693.66

HAP	E01-E04, E06 and E07	E08	E09	TK004	Insignificant Activities	Total
1,1,2,2-Tetrachloroethane	6.69E-02	1.05E-03	2.73E-03	0.000	0.002	0.073
1,1,2-Trichloroethane	5.32E-02	8.36E-04	2.17E-03	0.000	0.002	0.058
1,3-Butadiene	8.27E-01	7.02E-03	1.82E-02	0.000	0.000	0.852
1,3-Dichloropropene	4.42E-02	6.94E-04	1.80E-03	0.000	0.000	0.047
2,2,4-Trimethylpentane	8.53E-01	6.57E-03	1.71E-02	0.000	0.000	0.877
Acetaldehyde	7.83E+00	2.20E-01	5.71E-01	0.000	0.000	8.62
Acrolein	7.85E+00	1.35E-01	3.51E-01	0.000	0.000	8.33
Benzene	1.96E+00	1.16E-02	3.01E-02	0.006	0.000	2.00
Biphenyl	3.98E-03	5.57E-03	1.45E-02	0.000	0.000	0.024
Carbon Tetrachloride	6.12E-02	9.64E-04	2.51E-03	0.000	0.000	0.065
Chlorobenzene	4.48E-02	7.99E-04	2.08E-03	0.000	0.000	0.048
Chloroethane	1.89E-03	4.91E-05	1.28E-04	0.000	0.000	0.002
Chloroform	4.75E-02	7.49E-04	1.95E-03	0.000	0.000	0.050
Ethylbenzene	1.09E-01	1.04E-03	2.71E-03	0.006	0.000	0.119
Ethylene Dibromide	7.40E-02	1.16E-03	3.03E-03	0.000	0.000	0.078
Formaldehyde	5.57E+01	1.39E+00	3.61E+00	0.000	0.005	60.7
Methanol	2.50E+00	6.57E-02	1.71E-01	0.000	0.000	2.74
Methylene Chloride	1.48E-01	5.26E-04	1.37E-03	0.000	0.000	0.150
n-Hexane	4.49E-01	2.92E-02	7.58E-02	0.013	0.050	0.617
Naphthalene	9.71E-02	1.96E-03	5.08E-03	0.000	0.000	0.104
Phenol	4.25E-02	6.31E-04	1.64E-03	0.000	0.000	0.045
Styrene	5.53E-02	6.20E-04	1.61E-03	0.000	0.000	0.058
Toluene	9.71E-01	1.07E-02	2.79E-02	0.006	0.000	1.02
Vinyl Chloride	2.49E-02	3.92E-04	1.02E-03	0.000	0.000	0.026
Xylene	2.70E-01	4.84E-03	1.26E-02	0.006	0.000	0.294
Ethylene Glycol	0.00E+00	0.00E+00	0.00E+00	0.000	2.000	2.00
Total HAPs:	80.07	1.89	4.93	0.037	2.06	88.99
Highest Single HAP: Formaldehyde						60.7

Appendix A: Emission Calculations
Total Emissions Summary: Limited Potential to Emit

Company Name: ANR Pipeline Company - St. John Station
Address City IN Zip: 10313 White Oak Avenue, St. John, Indiana 46373
Part 70 Permit No.: T 089-17532-00069
Reviewer: Brandon Snoddy
Date: May 21, 2008

Limited Potential to Emit (tons/yr)

Facility	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Four (4) engine compressors (E01 - E04)	8.52	10.72	0.13	703.12	26.62	85.62
Two (2) engine compressors (E06,E07)	30.22	38.02	0.460	1228.28	63.73	337.20
One (1) generator (E08)	0.001	0.090	0.005	36.7	1.06	3.47
One (1) engine compressor (E09)	0.005	0.682	0.040	24.1	8.06	21.66
Condensate storage tank (TK004)	0.00	0.00	0.00	0.00	0.129	0.00
Insignificant Activites (Conservatively estimated emissions from combustion, welding, degreasing and storage tanks)	5.00	5.00	2.00	5.00	10.0	5.00
Total	43.75	54.51	2.64	1997.26	109.60	452.95

HAP	E01-E04, E06 and E07	E08	E09	TK004	Insignificant Activities	Total
1,1,2,2-Tetrachloroethane	6.69E-02	3.60E-04	2.73E-03	0.000	0.002	0.072
1,1,2-Trichloroethane	5.32E-02	2.86E-04	2.17E-03	0.000	0.002	0.058
1,3-Butadiene	8.27E-01	2.40E-03	1.82E-02	0.000	0.000	0.848
1,3-Dichloropropene	4.42E-02	2.38E-04	1.80E-03	0.000	0.000	0.046
2,2,4-Trimethylpentane	8.53E-01	2.25E-03	1.71E-02	0.000	0.000	0.873
Acetaldehyde	7.83E+00	7.52E-02	5.71E-01	0.000	0.000	8.47
Acrolein	7.85E+00	4.63E-02	3.51E-01	0.000	0.000	8.25
Benzene	1.96E+00	3.96E-03	3.01E-02	0.006	0.000	2.00
Biphenyl	3.98E-03	1.91E-03	1.45E-02	0.000	0.000	0.020
Carbon Tetrachloride	6.12E-02	3.30E-04	2.51E-03	0.000	0.000	0.064
Chlorobenzene	4.48E-02	2.74E-04	2.08E-03	0.000	0.000	0.047
Chloroethane	1.89E-03	1.68E-05	1.28E-04	0.000	0.000	0.0020
Chloroform	4.75E-02	2.57E-04	1.95E-03	0.000	0.000	0.050
Ethylbenzene	1.09E-01	3.57E-04	2.71E-03	0.006	0.000	0.118
Ethylene Dibromide	7.40E-02	3.99E-04	3.03E-03	0.000	0.000	0.077
Formaldehyde	5.57E+01	4.75E-01	3.61E+00	0.000	0.005	59.8
Methanol	2.50E+00	2.25E-02	1.71E-01	0.000	0.000	2.70
Methylene Chloride	1.48E-01	1.80E-04	1.37E-03	0.000	0.000	0.150
n-Hexane	4.49E-01	9.99E-03	7.58E-02	0.013	0.050	0.598
Naphthalene	9.71E-02	6.70E-04	5.08E-03	0.000	0.000	0.103
Phenol	4.25E-02	2.16E-04	1.64E-03	0.000	0.000	0.044
Styrene	5.53E-02	2.12E-04	1.61E-03	0.000	0.000	0.057
Toluene	9.71E-01	3.67E-03	2.79E-02	0.006	0.000	1.01
Vinyl Chloride	2.49E-02	1.34E-04	1.02E-03	0.000	0.000	0.026
Xylene	2.70E-01	1.66E-03	1.26E-02	0.006	0.000	0.291
Ethylene Glycol	0.00E+00	0.00E+00	0.00E+00	0.000	2.000	2.000
Total HAPs:	80.07	0.65	4.93	0.04	2.06	87.74
Highest Single HAP: Formaldehyde						59.8