



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: August 30, 2005  
RE: Vector Pipeline L.P. / 091-19637-00119  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### **Notice of Decision: Approval – Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification 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 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. 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 a Title V operating permit 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 make Indiana a cleaner, healthier place to live.*

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Mr. S. Mark Curwin  
Vector Pipeline L.P.  
119 N. 25th Street East  
Superior, WI 54880-5427

August 30, 2005

Re: 091-19637-00119  
First Significant Permit Modification to  
Part 70 No.: T 091-15438-00119

Dear Mr. Curwin:

Vector Pipeline L.P. was issued a permit on December 18, 2003 for a natural gas pipeline compressor station. A letter requesting changes to this permit was received on September 22, 2004. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of enforceable limits to ensure that this source remains a minor source under 326 IAC 2-2 (PSD), and the corresponding record keeping and reporting requirements. The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised Title V Operating Permit, with all modifications and amendments will be provided upon approval.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Edward A. Longenberger, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 ext. 20 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
EAL/MES

cc: File - LaPorte County  
U.S. EPA - Region V  
LaPorte County Health Department  
Northwest Regional Office  
Air Compliance Section Inspector – Letty Zepeda  
Compliance Branch  
Administrative and Development Section  
Technical Support and Modeling - Michelle Boner



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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

### Vector Pipeline, L.P. Intersection of Indiana Toll Road and Fail Road LaPorte, Indiana 46350

(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 091-15438-00119	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 18, 2003  Expiration Date: December 18, 2008
First Significant Permit Modification No.: 091-19637-00119	
Pages Affected: 5, 23 - 26, 29, 30	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 30, 2005

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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)]

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The Permittee owns and operates a stationary natural gas pipeline compressor station.

Responsible Official: S. Mark Curwin  
Source Address: Intersection of Indiana Toll Road and Fail Road, LaPorte, Indiana 46350  
Mailing Address: 119 North 25<sup>th</sup> Street East, Superior, Wisconsin, 54880  
General Source Phone: (715) 394-1456  
SIC Code: 4922  
County Location: LaPorte  
Source Location Status: Nonattainment for 8-hour ozone  
Attainment for all remaining criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules;  
Major Source, under nonattainment NSR;  
Minor 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)]

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

Two (2) natural gas-fired Solar Turbines, identified as Turbine #1 and #2, constructed in 2001, using dry low NO<sub>x</sub> (DLN) control technology, exhausting to Stacks SV001 and SV002, rated at 15,000 horsepower and 120 million British thermal units per hour, each.

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

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

Emergency generators as follows: Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower: One (1) natural gas-fired stand-by generator, identified as SPU, constructed in 2001, exhausting to Stack SV003, rated at 650 kiloWatts (872 horsepower) and 6.24 million British thermal units per hour.

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

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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]**

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

### **B.3 Enforceability [326 IAC 2-7-7]**

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

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

### **B.5 Severability [326 IAC 2-7-5(5)]**

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, 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 a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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- (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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

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]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection

schedule for said items or conditions; and

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Northwest Regional Office: 219-881-6712

Northwest Regional Office Facsimile: 219-881-6745

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

100 North Senate Avenue  
Indianapolis, Indiana 46204

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, 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) Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after

the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, 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]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

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

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

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.16 Permit Renewal [326 IAC 2-7-4]**

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

1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.
- B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-

11(c)(3)]

- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

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

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

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

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

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

and

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

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

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

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

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

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

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.

Vector Pipeline, L.P.  
LaPorte, Indiana  
Permit Reviewer: EAL/MES

First Significant Permit Modification No. 091-19637-00119  
Revised by: EAL/MES

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204  
  
The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.23** Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52, Subpart P] [326 IAC 6-3-2]
- (a) Pursuant to 40 CFR 52, Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.
- C.2 Opacity [326 IAC 5-1]
- Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Stack Height [326 IAC 1-7]
- The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or

more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR

61.145(a).

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

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

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

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

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

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 source 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.10 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.11 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  
Indianapolis, Indiana 46204

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.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

**C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

**C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

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

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) 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.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

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

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

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

**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204
- The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner 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.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204
- (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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.20 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)]:

Two (2) natural gas-fired Solar Turbines, identified as Turbine #1 and #2, constructed in 2001, using dry low NO<sub>x</sub> (DLN) control technology, exhausting to Stacks SV001 and SV002, rated at 15,000 horsepower and 120 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 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60 Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to the facilities described in this section except when otherwise specified in 40 CFR 60 Subpart GG.

#### D.1.2 New Source Performance Standards (NSPS) (Stationary Gas Turbines) [326 IAC 12] [40 CFR Part 60, Subpart GG]

(a) The two (2) natural gas-fired turbines (Turbine #1 and #2) are subject to 40 CFR Part 60, Subpart GG because the heat input at peak load is equal to or greater than 10.7 gigajoules per hour, based on the lower heating value of the fuel fired.

(b) Pursuant to 326 IAC 12-1 and 40 CFR 60, Subpart GG (Stationary Gas Turbines), the Permittee shall:

(1) Limit nitrogen oxides emissions, as required by 40 CFR 60.332, to:

$$\text{STD} = 0.015 \frac{(14.4)}{Y} + F,$$

where STD = allowable NO<sub>x</sub> emissions (percent by volume at 15 percent oxygen on a dry basis).

Y = manufacturer's rated heat rate at manufacturer's rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.

F = NO<sub>x</sub> emission allowance for fuel-bound nitrogen as defined in paragraph (a)(3) of 40 CFR 60.332.

(2) Limit sulfur dioxide emissions, as required by 40 CFR 60.333, to 0.015 percent by volume at 15 percent oxygen on a dry basis, or use natural gas fuel with a sulfur content less than or equal to 0.8 percent by weight.

#### D.1.3 PSD Minor Limit [326 IAC 2-2]

(a) The CO emissions from Turbine #1 and Turbine #2 shall be limited to less than a total of 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit shall be accomplished as follows:

(1) When operating at a load less than 92% Natural Gas Processor Speed (NGP), which includes periods of startup and shutdown, CO emissions from each turbine shall not

exceed 400 pounds per hour.

- (2) When operating at a load at or above 92% NGP, CO emissions from each turbine shall not exceed 13.43 pounds per hour.

These limits are required to limit the potential to emit of CO from the entire source to less than two hundred fifty (250) tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

- (b) The NO<sub>x</sub> emissions from Turbine #1 and Turbine #2 shall be limited to less than a total of 245 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit shall be accomplished as follows:

NO<sub>x</sub> emissions from each turbine shall not exceed 20.0 pounds per hour, including periods of startup and shutdown.

This limit is required to limit the potential to emit of NO<sub>x</sub> from the entire source to less than two hundred fifty (250) tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

- (c) Except for periods of startup or shutdown, the Permittee shall not operate the turbines at loads less than 86% NGP.

#### D.1.4 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 these facilities and any control devices.

### **Compliance Determination Requirements**

#### D.1.5 40 CFR Part 60, Subpart GG Compliance Requirements (Stationary Gas Turbines)

Pursuant to 40 CFR Part 60, Subpart GG (Stationary Gas Turbines), the Permittee shall:

Monitor the sulfur content and nitrogen content of the fuel being fired in the turbines, as required by 40 CFR 60.334(b). The custom schedule for the two (2) natural gas-fired turbines shall be the following:

- (a) Monitoring of fuel nitrogen content shall not be required while natural gas is the only fuel fired in the gas turbine.
- (b) Monitoring of fuel sulfur content shall not be required while natural gas, as defined in 40 CFR 60.331(u), is the only fuel fired in the gas turbine. Vector Pipeline, L.P. shall obtain prior IDEM, OAQ approval before burning any fuel other than natural gas in the turbine. In accordance with the compliance demonstration methods in 40 CFR 60.334(h)(3)(i), sulfur monitoring will not be required based on current, valid tariffs that limit the sulfur content of natural gas transported by Vector Pipeline L.P. to 20.0 grains per hundred cubic feet.
- (c) Records of sample analysis and fuel supply pertinent to this custom schedule shall be retained for a period of three years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.

#### D.1.6 CO Emissions

In order to demonstrate compliance with Condition D.1.3(a), the Permittee shall obtain from the continuous monitoring system the hours of operation and the NGP for each turbine, recorded on and averaging period not exceeding an hourly basis. For durations when the NGP is less than 92%, a CO

emission rate of 400 pounds per hour per turbine, or the emission rate determined based on the most recent IDEM-validated stack testing, shall be utilized. For durations when the NGP is equal to or greater than 92%, a CO emission rate of 13.43 pounds per hour, or the emission rate determined based on the most recent IDEM-validated stack testing, shall be utilized. These emission rates shall be multiplied by the hours of operation of each turbine in order to calculate the CO emissions for each turbine:

$$\text{CO emissions (tons)} = (\text{number of hours operating less than 92\% NGP} * 400 \text{ lbs CO / hour} * 1 \text{ ton} / 2000 \text{ lbs}) + (\text{number of hours operating at or greater than 92\% NGP} * 13.43 \text{ lbs CO} / \text{hour} * 1 \text{ ton} / 2000 \text{ lbs})$$

Within thirty (30) days after the end of each month, the Permittee shall determine the total CO emissions for the month.

#### D.1.7 NO<sub>x</sub> Emissions

In order to demonstrate compliance with Condition D.1.3(b), the Permittee shall obtain from the continuous monitoring system the hours of operation for each turbine. The Permittee shall then multiply the hours of operation of each turbine by the emission rate of 20.0 pounds of NO<sub>x</sub> per hour, or the emission rate determined based on the most recent IDEM-validated stack testing:

$$\text{NO}_x \text{ emissions (tons)} = (\text{hours of operation} * 20.0 \text{ lbs NO}_x / \text{hour} * 1 \text{ ton} / 2000 \text{ lbs})$$

Within thirty (30) days after the end of each month, the total NO<sub>x</sub> emissions for the month shall be determined.

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

#### D.1.8 Natural Gas Producer Speed (NGP) Monitoring

A continuous monitoring system shall be calibrated, maintained, and operated on each turbine (Turbine #1 and Turbine #2) for measuring the hours of operation and natural gas producer speed (NGP). The NGP for each of the turbines shall be monitored continuously and recorded on an averaging period not exceeding an hourly basis.

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

#### D.1.9 Record Keeping Requirements

- (a) Pursuant to the custom monitoring schedule contained in Condition D.1.5, records of sample analysis and fuel supply pertinent to the custom schedule shall be retained for a period of three years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.
- (b) To document compliance with Condition D.1.3(a), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the CO emission limit established in Condition D.1.3(a).
  - (1) The number of hours that each turbine operated at an NGP less than 92%;
  - (2) The number of hours that each turbine operated at an NGP equal to or greater than 92%;
  - (3) The calculations used to quantify CO emissions for each month; and
  - (4) The amount of CO emitted for each compliance period.

- (c) To document compliance with Condition D.1.3(b), the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the NO<sub>x</sub> emission limits established in Condition D.1.3(b).
- (1) The number of hours that each turbine operated;
  - (2) The calculations used to quantify NO<sub>x</sub> emissions for each month; and
  - (3) The amount of NO<sub>x</sub> emitted for each compliance period.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.3(a) and D.1.3(b) 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).

#### D.1.11 NSPS Reporting Requirement

Pursuant to the New Source Performance Standards (NSPS), Part 60.330, Subpart GG, the Permittee is hereby advised of the requirement to report the following at the appropriate times:

Date of performance testing (at least thirty (30) days prior to such date), when required by a condition elsewhere in this permit.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

Emergency generators as follows: Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower: One (1) natural gas-fired stand-by generator, identified as SPU, constructed in 2001, exhausting to Stack SV003, rated at 650 kiloWatts (872 horsepower) and 6.24 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 Operation Limitation

Pursuant to the definition of emergency generators, operation of one (1) natural gas-fired stand-by generator, identified as SPU, shall be limited to an annual total of 500 hours.

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

#### D.2.2 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records of the hours of operation of the stand-by generator, identified as SPU.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Vector Pipeline, L.P.  
Source Address: Intersection of Indiana Toll Road and Fail Road, LaPorte, Indiana 46350  
Mailing Address: 119 North 25th Street East, Superior, Wisconsin, 54880  
Part 70 Permit No.: T 091-15438-00119

**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 DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Vector Pipeline L.P.  
 Source Address: Intersection of Indiana Toll Road and Fail Road, LaPorte, Indiana  
 Mailing Address: 119 N. 25th Street East, Superior, WI 54880-5427  
 Part 70 Permit No.: T 091-15438-00119  
 Facilities: Turbines #1 and #2  
 Parameter: CO emissions  
 Limit: Less than a total of 249 tons per twelve (12) consecutive month period with compliance determined at the end of each month. When operating at a load less than 92% Natural Gas Processor Speed (NGP), which includes periods of startup and shutdown, CO emissions from each turbine shall not exceed 400 pounds per hour. When operating at a load at or above 92% NGP, CO emissions from each turbine shall not exceed 13.43 pounds per hour.

YEAR: \_\_\_\_\_

Month	CO emissions (tons)	CO emissions (tons)	CO emissions (tons)
	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 Quarterly Report**

Source Name: Vector Pipeline L.P.  
Source Address: Intersection of Indiana Toll Road and Fail Road, LaPorte, Indiana  
Mailing Address: 119 N. 25th Street East, Superior, WI 54880-5427  
Part 70 Permit No.: T 091-15438-00119  
Facilities: Turbines #1 and #2  
Parameter: NO<sub>x</sub> emissions  
Limit: Less than a total of 245 tons per twelve (12) consecutive month period with compliance determined at the end of each month. NO<sub>x</sub> emissions from each turbine shall not exceed 20.0 pounds per hour, including periods of startup and shutdown.

YEAR: \_\_\_\_\_

Month	NO <sub>x</sub> emissions (tons)	NO <sub>x</sub> emissions (tons)	NO <sub>x</sub> emissions (tons)
	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 BRANCH  
100 North Senate Avenue  
Indianapolis, Indiana 46204  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Vector Pipeline, L.P.  
Source Address: Intersection of Indiana Toll Road and Fail Road, LaPorte, Indiana 46350  
Mailing Address: 119 North 25th Street East, Superior, Wisconsin, 54880  
Part 70 Permit No.: T 091-15438-00119

**This form consists of 2 page**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

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

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

Source Name: Vector Pipeline, L.P.  
Source Address: Intersection of Indiana Toll Road and Fail Road, LaPorte, Indiana 46350  
Mailing Address: 119 North 25th Street East, Superior, Wisconsin, 54880  
Part 70 Permit No.: T 091-15438-00119

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

<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. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	

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

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

### **Technical Support Document (TSD) for a Part 70 Significant Permit Modification**

#### **Source Background and Description**

<b>Source Name:</b>	<b>Vector Pipeline L.P.</b>
<b>Source Location:</b>	<b>Intersection of Indiana Toll Road and Fail Road, LaPorte, Indiana</b>
<b>County:</b>	<b>LaPorte</b>
<b>SIC Code:</b>	<b>4922</b>
<b>Operation Permit No.:</b>	<b>T 091-15438-00119</b>
<b>Operation Permit Issuance Date:</b>	<b>December 18, 2003</b>
<b>Significant Permit Modification No.:</b>	<b>SPM 091-19637-00119</b>
<b>Permit Reviewer:</b>	<b>Edward A. Longenberger</b>

The Office of Air Quality (OAQ) has reviewed a modification application from Vector Pipeline L.P. relating to the operation of their existing natural gas pipeline compressor station.

#### **History**

Vector Pipeline L.P. was issued a Part 70 permit on December 18, 2003. On September 24, 2004, Vector Pipeline L.P. submitted an application to the OAQ requesting to add permit limitations that would ensure that the source is a minor source under 326 IAC 2-2 (Prevention of Significant Deterioration).

When operating at lower loads, the hourly CO emission rate can increase significantly. These limits will take into consideration the variability of CO emission rates with respect to turbine load. The Permittee will use their plant monitoring system to continuously monitor and record the operating load of each turbine. The number of hours operating at a turbine load less than 92% will be counted, and the number of hours operating at or above 92% will be counted. The Permittee can then calculate their CO emissions by multiplying the number of hours operating at a load less than 92% by a CO emission limit of 400 pounds per hour, and by multiplying the number of hours operating at a load at or above 92% by a CO emission limit of 13.43 pounds per hour. The limits are based on pound per hour emission rates which have been verified through stack testing performed on the source on June 2 and 3, 2004.

#### **Enforcement Issue**

There are no enforcement actions pending.

#### **Recommendation**

The staff recommends to the Commissioner that the Part 70 Significant Permit Modification 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 September 24, 2004.

### Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(d)(1) because the modification includes significant changes to existing monitoring requirements.

### County Attainment Status

The source is located in LaPorte County.

Pollutant	Status
PM <sub>10</sub>	Attainment
PM <sub>2.5</sub>	Nonattainment
SO <sub>2</sub>	Maintenance Attainment
NO <sub>2</sub>	Attainment
1-Hour Ozone	Attainment
8-Hour Ozone	Marginal Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. LaPorte County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Emission Offset (326 IAC 2-3).
- (b) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated LaPorte County as nonattainment for PM<sub>2.5</sub>. 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 non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM<sub>10</sub> emissions as surrogate for PM<sub>2.5</sub> emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (c) LaPorte County has been classified as attainment or unclassifiable in Indiana 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 for the source section.

### Limited Potential to Emit

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls.

Process/facility	Limited Potential To Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Two (2) natural gas-fired turbines (Turbine #1 and #2)	6.94	6.94	63.2	2.21	Limited to less than 249	Limited to less than 245	Single less than 10.0 Total less than 25.0
Emergency generator (SPU)	0.015	0.060	0.001	0.187	0.602	4.95	
Total Emissions	6.96	7.00	63.2	2.40	Less than 250	Less than 250	

- (a) This existing source is not a major stationary source under 326 IAC 2-2 (PSD) because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) This existing source is a major stationary source under 326 IAC 2-3 (Emission Offset) because a nonattainment regulated pollutant (NO<sub>x</sub>) is emitted at a rate of one hundred (100) tons per year or more.
- (c) These emissions (except the CO and NO<sub>x</sub> limits for the turbines) are based upon the Technical Support Document for T 091-15438-00119. The CO and NO<sub>x</sub> limits for the two turbines have been chosen such that the source remains a minor source under 326 IAC 2-2, but allows the Permittee more operational flexibility.

**Proposed Changes**

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

The address of the IDEM, OAQ has changed as follows:

Indiana Department of Environmental Management  
 Compliance Branch, Office of Air Quality  
 100 North Senate Avenue, ~~P. O. Box 6045~~  
 Indianapolis, Indiana 46204 ~~6-6045~~

The address has been changed throughout the permit document.

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

The Permittee owns and operates a stationary natural gas pipeline compressor station.

Responsible Official: **S. Mark Curwin Chairman**  
 Source Address: Intersection of Indiana Toll Road and Fail Road, LaPorte, Indiana 46350  
 Mailing Address: 119 North 25th Street East, Superior, Wisconsin, 54880  
 General Source Phone: (715) 394-~~1456~~4578  
 SIC Code: 4922  
 County Location: LaPorte  
 Source Location Status: **Nonattainment for 8-hour ozone**  
 Attainment for all **remaining** criteria pollutants  
 Source Status: Part 70 Permit Program  
 Minor Source, under PSD Rules;

**Major source, under Emission Offset Rules;**  
Minor 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:

Two (2) natural gas-fired Solar Turbines, identified as Turbine #1 and #2, constructed in 2000~~4~~, using dry low NO<sub>x</sub> (DLN) control technology, exhausting to Stacks SV001 and SV002, rated at 15,000 horsepower and 120 million British thermal units per hour, each.

**SECTION D.1 FACILITY OPERATION CONDITIONS**

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

Two (2) natural gas-fired Solar Turbines, identified as Turbine #1 and #2, constructed in 2000~~4~~, using dry low NO<sub>x</sub> (DLN) control technology, exhausting to Stacks SV001 and SV002, rated at 15,000 horsepower and 120 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 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60 Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to the facilities described in this section except when otherwise specified in 40 CFR 60 Subpart GG.

D.1.2 New Source Performance Standards (NSPS) (Stationary Gas Turbines) [326 IAC 12] [40 CFR Part 60, Subpart GG]

(a) The two (2) natural gas-fired turbines (Turbine #1 and #2) are subject to 40 CFR Part 60, Subpart GG because the heat input at peak load is equal to or greater than 10.7 gigajoules per hour, based on the lower heating value of the fuel fired.

(b) Pursuant to 326 IAC 12-1 and 40 CFR 60, Subpart GG (Stationary Gas Turbines), the Permittee shall:

(1) Limit nitrogen oxides emissions, as required by 40 CFR 60.332, to:

$$\text{STD} = 0.0075 \frac{(14.4)}{Y} + F,$$

where STD = allowable NO<sub>x</sub> emissions (percent by volume at 15 percent oxygen on a dry basis).

Y = manufacturer's rated heat rate at manufacturer's rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.

F = NO<sub>x</sub> emission allowance for fuel-bound nitrogen as defined in paragraph (a)(3) of 40 CFR 60.332.

- (2) Limit sulfur dioxide emissions, as required by 40 CFR 60.333, to 0.015 percent by volume at 15 percent oxygen on a dry basis, or use natural gas fuel with a sulfur content less than or equal to 0.8 percent by weight.

#### **D.1.3 PSD Minor Limit [326 IAC 2-2]**

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(a) **The CO emissions from Turbine #1 and Turbine #2 shall be limited to less than a total of 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit shall be accomplished as follows:**

- (1) **When operating at a load less than 92% Natural Gas Processor Speed (NGP), which includes periods of startup and shutdown, CO emissions from each turbine shall not exceed 400 pounds per hour.**
- (2) **When operating at a load at or above 92% NGP, CO emissions from each turbine shall not exceed 13.43 pounds per hour.**

**These limits are required to limit the potential to emit of CO from the entire source to less than two hundred fifty (250) tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.**

(b) **The NO<sub>x</sub> emissions from Turbine #1 and Turbine #2 shall be limited to less than a total of 245 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit shall be accomplished as follows:**

**NO<sub>x</sub> emissions from each turbine shall not exceed 20.0 pounds per hour, including periods of startup and shutdown.**

**This limit is required to limit the potential to emit of NO<sub>x</sub> from the entire source to less than two hundred fifty (250) tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.**

(c) **Except for periods of startup or shutdown, the Permittee shall not operate the turbines at loads less than 86% NGP.**

#### **D.1.43 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

#### **Compliance Determination Requirements**

#### **D.1.54 40 CFR Part 60, Subpart GG Compliance Requirements (Stationary Gas Turbines)**

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Pursuant to 40 CFR Part 60, Subpart GG (Stationary Gas Turbines), the Permittee shall:

Monitor the sulfur content and nitrogen content of the fuel being fired in the turbines, as required by 40 CFR 60.334(b). The custom schedule for the two (2) natural gas-fired turbines shall be the following:

- (a) Monitoring of fuel nitrogen content shall not be required while natural gas is the only fuel fired in the gas turbine.
- (b) Monitoring of fuel sulfur content shall not be required while ~~pipeline-quality~~ natural gas, **as defined in 40 CFR 60.331(u)**, is the only fuel fired in the gas turbine. Vector Pipeline, L.P. shall obtain prior IDEM, OAQ approval before burning any fuel other than ~~pipeline-quality~~ natural gas in the turbine. **In accordance with the compliance demonstration methods in**

**40 CFR 60.334(h)(3)(i), sulfur monitoring will not be required based on current, valid tariffs that limit the sulfur content of natural gas transported by Vector Pipeline L.P. to 20.0 grains per hundred cubic feet.**

- (c) Records of sample analysis and fuel supply pertinent to this custom schedule shall be retained for a period of three years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.

#### **D.1.6 CO Emissions**

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In order to demonstrate compliance with Condition D.1.3(a), the Permittee shall obtain from the continuous monitoring system the hours of operation and the hourly averages of NGP for each turbine. For each hour when the NGP is less than 92%, a CO emission rate of 400 pounds per hour per turbine shall be utilized. For each hour when the NGP is equal to or greater than 92%, a CO emission rate of 13.43 pounds per hour shall be utilized. These emission rates shall be multiplied by the hours of operation of each turbine in order to calculate the CO emissions for each turbine:

**CO emissions (tons) = (number of hours operating less than 92% NGP \* 400 lbs CO / hour \* 1 ton / 2000 lbs) + (number of hours operating at or greater than 92% NGP \* 13.43 lbs CO / hour \* 1 ton / 2000 lbs)**

Within thirty (30) days after the end of each month, the Permittee shall determine the total CO emissions for the month.

#### **D.1.7 NO<sub>x</sub> Emissions**

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In order to demonstrate compliance with Condition D.1.3(b), the Permittee shall obtain from the continuous monitoring system the hours of operation for each turbine. The Permittee shall then multiply the hours of operation of each turbine by the emission rate of 20.0 pounds of NO<sub>x</sub> per hour:

**NO<sub>x</sub> emissions (tons) = (hours of operation \* 20.0 lbs NO<sub>x</sub> / hour \* 1 ton / 2000 lbs)**

Within thirty (30) days after the end of each month, the total NO<sub>x</sub> emissions for the month shall be determined.

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

~~There are no specific compliance monitoring requirements applicable to these emission units.~~

#### **D.1.8 Natural Gas Producer Speed (NGP) Monitoring**

---

A continuous monitoring system shall be calibrated, maintained, and operated on each turbine (Turbine #1 and Turbine #2) for measuring the hours of operation and natural gas producer speed (NGP). The NGP shall be monitored continuously, and the fifteen (15) minute average shall be calculated and recorded at all times when either of the turbines is in operation.

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

##### **D.1.95 Record Keeping Requirements**

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- (a) Pursuant to the custom monitoring schedule contained in Condition D.1.54, records of sample analysis and fuel supply pertinent to the custom schedule shall be retained for a period of three years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.

- (b) To document compliance with Condition D.1.3(a), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the CO emission limit established in Condition D.1.3(a).
- (1) The number of hours that each turbine operated at an NGP less than 92%;
  - (2) The number of hours that each turbine operated at an NGP equal to or greater than 92%;
  - (3) The calculations used to quantify CO emissions for each month; and
  - (4) The amount of CO emitted for each compliance period.
- (c) To document compliance with Condition D.1.3(b), the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the NO<sub>x</sub> emission limits established in Condition D.1.3(b).
- (1) The number of hours that each turbine operated;
  - (2) The calculations used to quantify NO<sub>x</sub> emissions for each month; and
  - (3) The amount of NO<sub>x</sub> emitted for each compliance period.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.10 Reporting Requirements**

**A quarterly summary of the information to document compliance with Conditions D.1.3(a) and D.1.3(b) 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).**

#### **D.1.11 NSPS Reporting Requirement**

Pursuant to the New Source Performance Standards (NSPS), Part 60.330, Subpart GG, the Permittee is hereby advised of the requirement to report the following at the appropriate times:

Date of performance testing (at least thirty (30) days prior to such date), when required by a condition elsewhere in this permit.

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

**Part 70 Quarterly Report**

**Source Name:** Vector Pipeline L.P.  
**Source Address:** Intersection of Indiana Toll Road and Fail Road, LaPorte, Indiana  
**Mailing Address:** 119 N. 25th Street East, Superior, WI 54880-5427  
**Part 70 Permit No.:** T 091-15438-00119  
**Facilities:** Turbines #1 and #2  
**Parameter:** CO emissions  
**Limit:** Less than a total of 249 tons per twelve (12) consecutive month period with compliance determined at the end of each month. When operating at a load less than 92% Natural Gas Processor Speed (NGP), which includes periods of startup and shutdown, CO emissions from each turbine shall not exceed 400 pounds per hour. When operating at a load at or above 92% NGP, CO emissions from each turbine shall not exceed 13.43 pounds per hour.

YEAR: \_\_\_\_\_

Month	CO emissions (tons)	CO emissions (tons)	CO emissions (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
 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 Quarterly Report**

**Source Name:** Vector Pipeline L.P.  
**Source Address:** Intersection of Indiana Toll Road and Fail Road, LaPorte, Indiana  
**Mailing Address:** 119 N. 25th Street East, Superior, WI 54880-5427  
**Part 70 Permit No.:** T 091-15438-00119  
**Facilities:** Turbines #1 and #2  
**Parameter:** NO<sub>x</sub> emissions  
**Limit:** Less than a total of 245 tons per twelve (12) consecutive month period with compliance determined at the end of each month. NO<sub>x</sub> emissions from each turbine shall not exceed 20.0 pounds per hour, including periods of startup and shutdown.

**YEAR:** \_\_\_\_\_

Month	NO <sub>x</sub> emissions (tons)	NO <sub>x</sub> emissions (tons)	NO <sub>x</sub> emissions (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
Deviation has been reported on: \_\_\_\_\_

**Submitted by:** \_\_\_\_\_  
**Title/Position:** \_\_\_\_\_  
**Signature:** \_\_\_\_\_  
**Date:** \_\_\_\_\_  
**Phone:** \_\_\_\_\_

Attach a signed certification to complete this report.

**Conclusion**

The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 091-19637-00119.

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document for a Significant Permit Modification to a Part 70 Operating Permit

<b>Source Name:</b>	<b>Vector Pipeline L.P.</b>
<b>Source Location:</b>	<b>Intersection of Indiana Toll Road and Fail Road, LaPorte, Indiana</b>
<b>County:</b>	<b>LaPorte</b>
<b>SIC Code:</b>	<b>4922</b>
<b>Significant Permit Modification No.:</b>	<b>SPM 091-19637-00119</b>
<b>Permit Reviewer:</b>	<b>Edward A. Longenberger</b>

On June 1, 2005, the Office of Air Quality (OAQ) had a notice published in the News Dispatch, Michigan City, Indiana, stating that Vector Pipeline L.P. had applied for a Significant Permit Modification to a Part 70 Operating Permit to include emission limits on their existing natural gas-fired turbines. The notice also stated that OAQ proposed to issue a Significant Permit Modification and provided information on how the public could review the proposed Significant Permit Modification 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 Significant Permit Modification to a Part 70 Operating Permit should be issued as proposed.

On July 6, 2005, Rachael Shetka of Vector Pipeline L.P. submitted comments on the proposed Significant Permit Modification to a Part 70 Operating Permit. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

#### Comment 1:

In Section D.1.2(b)(1) the proper equation for the type of turbines at Springville is  $STD = 0.015 (14.4/Y) + F$  not  $STD = 0.0075 (14.4/Y) + F$ .

#### Response 1:

IDEM, OAQ agrees. The turbines meet the requirements of 40 CFR 60.332(d) because they are stationary turbines with a manufacturer's rated base load of 30 megawatts (40,230.66 horsepower) or less. Therefore, the NO<sub>x</sub> emissions from the turbines shall be limited according to the equation listed in 40 CFR 60.332(a)(2). The permit language is changed as follows:

D.1.2 New Source Performance Standards (NSPS) (Stationary Gas Turbines) [326 IAC 12] [40 CFR Part 60, Subpart GG]

---

(b) Pursuant to 326 IAC 12-1 and 40 CFR 60, Subpart GG (Stationary Gas Turbines), the Permittee shall:

(1) Limit nitrogen oxides emissions, as required by 40 CFR 60.332, to:

$$STD = \mathbf{0.015} \mathbf{0.0075} \frac{(14.4)}{Y} + F,$$

#### Comment 2:

In Section D.1.6 please edit the wording to read "In order to demonstrate compliance with Condition D.1.3(a), the Permittee shall obtain from the continuous monitoring system the hours of operation and the NGP for each turbine, recorded on and averaging period not exceeding an

hourly basis. For durations when the NGP is less than 92%, a CO emission rate of 400 pounds per hour per turbine, or the emission rate determined based on the most recent stack testing, shall be utilized. For durations when the NGP is equal to or greater than 92%, a CO emission rate of 13.43 pounds per hour, or the emission rate determined based on the most recent stack testing, shall be utilized.”

The intent of this comment is to allow Vector to use stack test data to demonstrate compliance with the permit limits. In addition, startups and shutdowns could be tracked on a minute basis instead of hourly as they occur over very short periods of time and should not require the assignment of an entire hour of emissions to each event.

### Response 2:

It is understood that startups and shutdowns can take less than one full hour. However, the emission limits of 400 or 13.43 pounds of CO per hour make it necessary to track turbine operation in terms of hours. Nevertheless, nothing in this permit precludes the Permittee from tracking the hours of operation in decimal format (e.g. 15 minutes = 0.25 hours). This should address Vector’s concerns about assigning an entire hour to a startup or shutdown event.

The IDEM, OAQ agrees that the hourly emission rate used to demonstrate compliance with the annual CO emission limit can be adjusted if IDEM-approved stack tests indicate that the current rates of 400 and 13.43 pounds of CO per hour are inappropriate. Therefore, Condition D.1.6 has been amended as shown:

#### D.1.6 CO Emissions

---

In order to demonstrate compliance with Condition D.1.3(a), the Permittee shall obtain from the continuous monitoring system the hours of operation **and the NGP for each turbine, recorded on and averaging period not exceeding an hourly basis** ~~and the hourly averages of NGP for each turbine.~~ For **durations each hour** when the NGP is less than 92%, a CO emission rate of 400 pounds per hour per turbine, **or the emission rate determined based on the most recent IDEM-validated stack testing**, shall be utilized. For **durations each hour** when the NGP is equal to or greater than 92%, a CO emission rate of 13.43 pounds per hour, **or the emission rate determined based on the most recent IDEM-validated stack testing**, shall be utilized. These emission rates shall be multiplied by the hours of operation of each turbine in order to calculate the CO emissions for each turbine:

$$\text{CO emissions (tons)} = (\text{number of hours operating less than 92\% NGP} * 400 \text{ lbs CO / hour} * 1 \text{ ton} / 2000 \text{ lbs}) + (\text{number of hours operating at or greater than 92\% NGP} * 13.43 \text{ lbs CO / hour} * 1 \text{ ton} / 2000 \text{ lbs})$$

Within thirty (30) days after the end of each month, the Permittee shall determine the total CO emissions for the month.

### Comment 3:

In Section D.1.7, please edit the wording to read “In order to demonstrate compliance with Condition D.1.3(b), the Permittee shall obtain from the continuous monitoring system the hours of operation for each turbine. The Permittee shall then multiply the duration of operation of each turbine by the emission rate of 20.0 pounds of NO<sub>x</sub> per hour, or the emission rate determined based on the most recent stack testing.”

The intent of this comment is to allow Vector to use stack test data to demonstrate compliance with the permit limits. In addition, startups and shutdowns could be tracked on a minute basis

instead of hourly as they occur over very short periods of time and should not require the assignment of an entire hour of emissions to each event.

**Response 3:**

As stated in Response 2, nothing in this permit precludes the Permittee from tracking the hours of operation in decimal format (e.g. 15 minutes = 0.25 hours). The IDEM, OAQ agrees that the hourly emission rate used to demonstrate compliance with the annual NO<sub>x</sub> emission limit can be adjusted if IDEM-approved stack tests indicate that the current rate of 20.0 pounds of NO<sub>x</sub> per hour is inappropriate. Condition D.1.7 has changed as shown:

**D.1.7 NO<sub>x</sub> Emissions**

---

In order to demonstrate compliance with Condition D.1.3(b), the Permittee shall obtain from the continuous monitoring system the hours of operation for each turbine. The Permittee shall then multiply the hours of operation of each turbine by the emission rate of 20.0 pounds of NO<sub>x</sub> per hour, **or the emission rate determined based on the most recent IDEM-validated stack testing:**

$$\text{NO}_x \text{ emissions (tons)} = (\text{hours of operation} * 20.0 \text{ lbs NO}_x / \text{hour} * 1 \text{ ton} / 2000 \text{ lbs})$$

Within thirty (30) days after the end of each month, the total NO<sub>x</sub> emissions for the month shall be determined.

**Comment 4:**

In Section D.1.8, please edit the wording to read "The NGP for each of the turbines shall be monitored continuously and recorded on an averaging period not exceeding an hourly basis."

The intent of this comment is to allow Vector to track startups and shutdowns on a minute basis instead of hourly as they occur over very short periods of time and should not require the assignment of an entire hour of emission to each event.

**Response 4:**

In order to clarify that the NGP shall be recorded and averaged on an hourly basis, but can also be averaged on a shorter term basis (e.g. a 15-minute average), Condition D.1.8 has been changed as follows:

**D.1.8 Natural Gas Producer Speed (NGP) Monitoring**

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A continuous monitoring system shall be calibrated, maintained, and operated on each turbine (Turbine #1 and Turbine #2) for measuring the hours of operation and natural gas producer speed (NGP). The NGP **for each of the turbines** shall be monitored continuously **and recorded on an averaging period not exceeding an hourly basis** ~~and the fifteen (15) minute average shall be calculated and recorded each hour that either of the turbines is in operation.~~

**Comment 5:**

In Section D.1.9(b)(1), please edit the wording to read "The duration that each turbine operated at an NGP less than 92%". If data is recorded on a minute basis, "duration" is a more appropriate term than "hours".

In Section D.1.9(b)(2), please edit the wording to read "The duration that each turbine operated at an NGP equal to or greater than 92%". If data is recorded on a minute basis, "duration" is a more appropriate term than "hours".

In Section D.1.9(c)(1), please edit the wording to read "The duration that each turbine operated". If data is recorded on a minute basis, "duration" is a more appropriate term than "hours".

**Response 5:**

As stated in Response 2, the emission limits of 400 or 13.43 pounds of CO per hour and 20.0 pounds of NO<sub>x</sub> per hour in Condition D.1.3 make it necessary to track turbine operation in terms of hours. The IDEM, OAQ feels that this change is unnecessary given that the Permittee can choose to record partial hours of operation in decimal format. No change to the permit is made as a result of this comment.

**Comment 6:**

Do the "Part 70 Quarterly Reports" on pages 29 and 30 replace the "Quarterly Deviation Compliance Monitoring Report" on pages 36 and 37 of the current permit or are they included as an additional reporting requirement? Please provide clarification as it is unclear at this point.

**Response 6:**

The Quarterly Report Forms on pages 29 and 30 are additional reporting requirements which are necessary to demonstrate compliance with the new CO and NO<sub>x</sub> emission limits in Condition D.1.3 (a) and (b). Vector Pipeline must still complete the Quarterly Deviation and Compliance Monitoring Report as it has in the past. No change to the permit is made as a result of this comment.