



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

December 23, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
www.in.gov/idem

TO: Interested Parties / Applicant

RE: ANR Pipeline, St. John / 089-20366-00069

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 approval 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) calendar 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.

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.

Enclosures  
FNPER-MOD.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

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December 23, 2004

Mr. David Jones  
ANR Pipeline – St. Johns  
750 Old Hickory Boulevard, Suite 190  
Brentwood, TN 37027

Re: 089-20366  
Minor Source Modification to:  
Part 70 permit No.: T089-6245-00069

Dear Mr. Jones:

ANR Pipeline – St. Johns was issued was issued Part 70 operating permit T089-6245-00069 on November 12, 1998 for the operation of a natural gas transmission and storage facility. An application to modify the source was received on November 12, 2004. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

A natural gas fueled reciprocating internal combustion internal compressor engine (RICE) (4 stroke lean), installed in 2005, identified as EO9, with a maximum capacity of two thousand (2000) horsepower, using an oxidation catalyst, identified as C09, to control carbon monoxide (CO) and hazardous air pollutant (HAP) emissions, and exhausting to stack 09.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction when the source modification has been issued. The source must comply with the requirements of 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12 before operation of any of the proposed emission units can begin.

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 call (800) 451-6027, and ask for Jenny Acker or extension 2-8253, or dial (317) 232-8253.

Sincerely,  
Original signed by

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

Section D.2 FACILITY OPERATION CONDITIONS

JLA

cc: File – Lake County  
Lake County Health Department  
Air Compliance Section Inspector Ramesh Tejuja  
IDEM Northwest Regional Office



Joseph E. Kernan  
Governor

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Commissioner

100 North Senate Avenue  
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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**ANR Pipeline Company  
10313 White Oak Avenue  
St. John, IN 46373**

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

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 and 326 IAC 2-1-3.2 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.: T089-6245-00069	
Issued by: Original Signed By Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: November 12, 1998  Expiration Date: November 12, 2003

First Significant Source Modification No.: 089-11347-00069, issued January 19, 2000  
First Administrative Amendment No.: 089-11359-00069, issued January 21, 2000  
First Reopening No.: 089-13357-00069, issued December 31, 2001  
Second Administrative Amendment No.: 089-14589-00069, issued April 4, 2002

First Minor Source Modification No.: 089-20366-00069	
Issued by: Original signed by Paul Dubenetzy, Branch Chief Office of Air Quality	Issuance Date: December 23, 2004



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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)]

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The Permittee owns and operates a stationary pipeline compressor station.

Responsible Official: Division Director  
Source Address: 10313 White Oak Avenue, St. John, IN 46373  
Mailing Address: 27725 Stansbury Boulevard, Farmington Hills, MI 48334  
SIC Code: 4922  
County Location: Lake  
County Status: Primary Nonattainment for SO<sub>x</sub> , nonattainment for ozone under the 1-hr. and 8-hr standards, attainment for all other criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source under Emission Offset Rules  
Major Source, Section 112 of the Clean Air Act

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

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This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) A natural gas fueled reciprocating internal combustion internal compressor engine (RICE) (4 stroke lean), installed in 2005, identified as EO9, with a maximum capacity of two thousand (2000) horsepower, using an oxidation catalyst, identified as C09, to control carbon monoxide (CO) and hazardous air pollutant (HAP) emissions, and exhausting to stack 09.

### 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):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

### 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).
- (3) 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 CONSTRUCTION CONDITIONS**

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

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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 Effective Date of the Permit [IC13-15-5-3]**

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Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

**B.3 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

## SECTION C GENERAL OPERATION CONDITIONS

### C.1 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).

### C.2 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 prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, 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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the

Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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)]

**C.4 Opacity [326 IAC 5-1]**

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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.5 Fugitive Dust Emissions [326 IAC 6-4]**

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

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

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

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

**C.7 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]**

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(a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, 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 approval, shall be submitted to:

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

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, 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, OAM, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

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If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

##### **C.10 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

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- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

##### **C.11 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.12 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, 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 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.13 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the

applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.14 Emergency Provisions [326 IAC 2-7-16]

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

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

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

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)(10) 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.

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

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

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

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- (a) Records of all required data, reports and support information 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 kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (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.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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- (a) The reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) 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.
- (c) 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).
- (d) 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.

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (1) A natural gas fueled reciprocating internal combustion internal compressor engine (RICE) (4 stroke lean), installed in 2005, identified as E09, with a maximum capacity of two thousand (2000) horsepower, using an oxidation catalyst, identified as C09, to control carbon monoxide (CO) and hazardous air pollutant (HAP) emissions, and exhausting to stack 09.

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

### Operation Conditions

### Emission Limitations and Standards

#### D.1.1 General Provisions Relating to National Emission Standards (NESHAP) [40 CFR 63, Subpart A][326 IAC 20]

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

#### D.1.2 Operation and Maintenance Provisions Relating to National Emission Standards (NESHAP) [40 CFR 63.6]

- (a) At all times, including periods of startup, shutdown, and malfunction, The Permittee shall operate and maintain the Stationary Rice (E09), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. [40 CFR 63.6(e)(1)(i)]
- (b) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan required by condition D.1.3. [40 CFR 63.6(e)(1)(ii)]
- (c) To the extent that an unexpected event arises during a startup, shutdown, or malfunction, the Permittee shall comply by minimizing emissions during such a startup, shutdown, and malfunction event consistent with the safety and good air pollution control practices. [40 CFR 63.6(e)(1)(ii)]

#### D.1.3 Startup, Shutdown, and Malfunction Provisions Relating to National Emission Standards (NESHAP) [40 CFR 63.6]

The Permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the Stationary RICE (E09) during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control and monitoring equipment used to comply with the relevant standard. This plan shall be developed by the Permittee, upon initial startup [40 CFR 63.6(b)]. [40 CFR 63.6(e)(3)(i)]

- (a) During periods of startup, shutdown, and malfunction, the Permittee of the Stationary RICE (E09) shall operate and maintain such facility (including associated air pollution control and monitoring equipment) in accordance with the procedures specified in the

startup, shutdown, and malfunction plan developed under paragraph 40 CFR 63.6(e)(3)(i). [40 CFR 63.6(e)(3)(ii)]

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

- (h) Upon making a revisions to the startup, shutdown, and malfunction plan which alters the scope of the activities at the Stationary RICE (E09) which are deemed to be a startup, shutdown, or malfunction, or otherwise modifies the applicability of any emission limit, work practice requirement, or other requirement in a standard established under this part, the revised plan shall not take effect until after the Permittee has provided a written notice describing the revision to IDEM, OAQ. [40 CFR 63.6(e)(3)(viii)]

D.1.4 National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

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

- (a) Upon startup [40 CFR 63.6595(a)(3)], the Permittee must comply with the following emission and operating limitations: [40 CFR 63.6600(b)]

- (1) CO emissions shall be reduced by ninety-three (93) percent or more. [40 CFR 63, Subpart ZZZZ, Table 2a(2)(a)]

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

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

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

D.1.5 Continuous Compliance Requirements Relating to National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

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

- (a) Except for monitor malfunctions, associated repairs, and the required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall monitor continuously at all times that the Stationary RICE (E09) is operating. [40 CFR 63.6635(b)]

- (b) The Permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The Permittee must, however, use all the valid data collected during all other periods. [40 CFR 63.6635(c)]

**D.1.6 Part 70 Minor Source Modifications [326 IAC 2-7-10.5(d)(3)]**

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The potential to emit of NO<sub>x</sub> shall not exceed 0.000371 pounds of NO<sub>x</sub> per standard cubic foot of fuel. This rate will limit the potential to emit of NO<sub>x</sub> to 24.14 tons per 12 consecutive month period.

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

Emission Unit	NO <sub>x</sub> Emissions (lbs NO <sub>x</sub> /scf fuel)	NO <sub>x</sub> Emissions (tons/year)
E09	3.71 E10-4	24.14

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

**D.1.7 Particulate [326 IAC 6-1-2]**

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Pursuant to 326 IAC 6-1-2(a) Particulate Matter particulate from the Stationary RICR (E09) shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry cubic standard foot.)

**D.1.8 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 this facility and any control devices.

**Compliance Determination Requirements**

**D.1.9 Testing Requirements Relating to National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]**

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

in compliance with the CO emission limitation, or the Permittee deviates from any operating limitations, D.1.4., the Permittee shall resume semi-annual performance tests. [Footnote to 40 CFR 63 Subpart ZZZZ, Table 3(1)]

- (c) Each performance test shall be conducted according to the requirements of 40 CFR 63.7(e)(1) and under the specific conditions specified in Table 4 of 40 CFR 63, Subpart ZZZZ. The test must be conducted at any load condition within plus or minus ten (10) percent of one hundred (100) percent load. [40 CFR 63.6615]
- (d) Pursuant to 40 CFR 63.6620(c), the Permittee shall not conduct performance test during periods of startup, shutdown, or malfunction as specified in 40 CFR 63.7(e)(1).
- (e) The Permittee shall conduct three (3) separate test runs for each performance test required in 40 CFR 63.6620 according to the specifications in 40 CFR 63.7(e)(3). Each test run must last at least one (1) hour. [40 CFR 63.6620(d)]
- (f) The Permittee shall use Equation 1 of 40 CFR 63.6620(e)(1) to determine compliance with the percent reduction requirement: [40 CFR 63.6620(e)(1)]

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

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

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

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

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

Where:  $F_o$  = Fuel factor based on the ratio of oxygen volume to the ultimate CO<sub>2</sub> volume produced by the fuel at zero percent excess air.

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

$F_d$  = Ratio of the volume of dry effluent gas to the gross calorific value of the fuel from Method 19, dsm<sup>3</sup>/J (dscf/10<sup>6</sup> Btu).

$F_c$  = Ratio of the volume of CO<sub>2</sub> produced to the gross calorific value of the fuel from Method 19, dsm<sup>3</sup>/J (dscf/10<sup>6</sup> Btu).

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

$$X_{CO_2} = \frac{5.9}{F_o} \quad (\text{Eq. 3})$$

Where:  $X_{CO_2}$  = CO<sub>2</sub> correction factor, percent.

5.9 = 20.9 percent O<sub>2</sub>-15 percent O<sub>2</sub>, the defined

O<sub>2</sub> correction value, percent.

- (3) Calculate the NOX and SO<sub>2</sub> gas concentrations adjusted to 15 percent O<sub>2</sub> using CO<sub>2</sub> as follows: [40 CFR 63.6620(e)(2)(iii)]

$$C_{adj.} = C_d \frac{X_{CO_2}}{\%CO_2} \quad (\text{Eq. 4})$$

Where: Measured CO<sub>2</sub> concentration measured, dry basis, percent.

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

D.1.10 Continuous Compliance Demonstration Provisions Relating to National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63.6630]

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- (a) The Permittee shall demonstrate continuous compliance with each applicable emission and operating limitation according to the following methods: [40 CFR 63.6640(a)]
- (1) Conduct semi-annual performance tests for CO to demonstrate that the required CO percent reduction is achieved; [40 CFR 63, Subpart ZZZZ, Table 6(1)(a)(i)] and
  - (2) Collect the catalyst inlet temperature data according to 63.6625(b); [40 CFR 63, Subpart ZZZ, table 6(1)(a)(ii)] and
  - (3) Reduce these data to 4-hour rolling averages. [40 CFR 63, Subpart ZZZZ, Table 6(1)(a)(iii)]
  - (4) Maintain the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature [40 CFR 63, Subpart ZZZZ, Table 6(1)(a)(iv)]
  - (5) Measure the pressure drop across the catalyst once per month and demonstrate that the pressure drop across the catalyst is within the operating limitation established during the performance test. [40 CFR 63, Subpart ZZZZ, Table 6(1)(a)(v)]
- (b) The Permittee shall report each instance in which applicable emission limitation or operating limitation in 40 CFR 63, Subpart ZZZZ Tables 2a and 2b were not met. These instances are deviations from the emission and operating limitations in 40 CFR 63, Subpart ZZZZ. These deviations must be reported according to the requirements in Sec. 63.6650. [40 CFR 63.6640(a)]

- (c) Upon changing the catalyst, the Permittee shall reestablish the values of the operating parameters measured during the initial performance test. When the Permittee reestablishes the values of the operating parameters, the Permittee shall also conduct a performance test to demonstrate that the Permittee is meeting the required emission limitation applicable to the stationary RICE (E09). [40 CFR 63.6640(b)]
- (d) During periods of startup, shutdown, and malfunction, the Permittee shall operate in accordance with the startup, shutdown, and malfunction plan as required by condition D.1.3. [40 CFR 63.6640(c)]
- (e) Consistent with 40 CFR 63.6(e) and 63.7(e)(1), deviations from the emission or operating limitations that occur during a period of startup, shutdown, or malfunction are not violations if the Permittee demonstrates to the IDEM, OAQ's satisfaction that the Permittee was operating in accordance with the startup, shutdown, and malfunction plan. For new, reconstructed, and rebuilt stationary RICE, deviations from the emission or operating limitations that occur during the first 200 hours of operation from engine startup (engine burn-in period) are not violations. [40 CFR 63.6640(d)]
- (f) The Permittee shall report each instance in which the applicable requirements of 40 CFR 63, Subpart ZZZZ, Table 8, are not meet. [40CFR 63.6640(e)]

**D.1.11 Initial Compliance Requirements Relating to National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63.6630]**

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- (a) Pursuant to 40 CFR 63.6630(a), the Permittee shall demonstrate initial compliance with each emission and operating limitation listed in D.1.3 according to Table 5 of 40 CFR 63, Subpart ZZZZ,. The Permittee has demonstrated initial compliance when:
- (1) The average reduction of emissions of CO determined from the initial performance test achieves the required CO percent reduction. [40 CFR 63, Subpart ZZZZ, Table 5(1)(a)(i)]
  - (2) The Permittee has installed a continuous parametric monitoring system (CPMS) to continuously monitor the oxidation catalyst inlet temperature according to the requirements in 40 CFR 63.6625(b). [40 CFR 63, Subpart ZZZZ, Table 5(1)(a)(ii)]
  - (3) The Permittee has recorded the oxidation catalyst pressure drop and the oxidation catalyst inlet temperature during the initial performance test. [40 CFR 63, Subpart ZZZZ, Table 5(1)(a)(iii)]
- (b) The Permittee shall establish each applicable operating limitation in Table 2b of 40 CFR 63, Subpart ZZZZ, during the initial performance test. [40 CFR 63.6630(b)]
- (c) The Permittee shall submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in 40 CFR 63.6645. [40 CFR 63.6630(c)]

**D.1.12 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

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Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify the NOx emission rate as per condition D.1.6 Part 70 Minor Source Modification for the stationary RICE (E09), utilizing methods as approved by the commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing

**Compliance Monitoring Requirements**

**D.1.13 Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

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There are no monitoring requirements applicable to this facility.

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

**D.1.14 Notification, Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

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- (a) To document compliance with Conditions D.1.7 Particulate [326 IAC 6-1-2], the Permittee shall maintain records documenting that all combustion facilities fired only natural gas.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.1.15 Notification Requirements Relating to National Emission Standards (NESHAP) for Stationary**

Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ][326 IAC 2-7-1(34)]

- (a) The Permittee shall submit the notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b) through (e), and (g) and (h), that apply to the Stationary RICR (E09) by the dates specified. [40 CFR 63.6645(a)]
- (b) The Permittee shall submit an Initial Notification not later than 120 days after startup [40 CFR 63.6645(c)]
- (c) The Permittee shall submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required by 40 CFR 63.7(b)(1). [40 CFR 63.6645(e)]
- (d) The Permittee shall submit a Notification of Compliance Status containing the information required by 40 CFR 63.9(h)(2)(ii). [40 CFR 63.6645(f)]
  - (1) For each initial compliance demonstration required in 40 CFR 63, Subpart ZZZZ, Table 5, that does not include a performance test, the Permittee shall submit the Notification of Compliance Status before the close of business on the 30th day following the completion of the initial compliance demonstration [40 CFR 63.6645(e)(1)]
  - (2) For each initial compliance demonstration required in 40 CFR 63, Subpart ZZZZ, Table 5, that includes a performance test conducting according to the requirements in 40 CFR, Subpart ZZZZ, Table 4, the Permittee shall submit the Notification of Compliance Status before the close of business on the 60th day following the completion of the performance test according to 40 CFR 63.10(d)(2). [40 CFR 63.6645(e)(2)]
- (e) The required notifications shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- (f) The Notifications require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

D.1.16 Report Requirements Relating to National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

- (a) The Permittee shall submit each applicable report in 40 CFR 63, Subpart ZZZZ, Table 7. [40CFR 63.6650(a)]
- (b) The Permittee shall submit the each report by the date in 40 CFR 63, Subpart ZZZZ, Table 7, in accordance with 40 CFR 63.6650(b)(1) through (5). [40 CFR 60.6650(b)]
  - (1) The first Compliance report must cover the period beginning with startup of the Stationary RICE (E09) and ending on June 30, or December 31, whichever date is the first date following the end of the first calendar half after startup. [40 CFR 60.6650(b)(1)]

The first Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after startup. [40 CFR 63.6650(b)(2)]

- (2) Each subsequent Compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period covering the period from July 1 through December 31. [40 CFR 63.6650(b)(3)]

Each subsequent Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after startup. [40 CFR 63.6650(b)(4)]

- (c) The Compliance Reports shall contain the information required by 40 CFR 63.6650(c)(1) through (6). [40 CFR 63.6650(c)]
- (d) For each deviation from an emission or operating limitation that occurs for the Stationary RICE (E09), the Permittee shall include the information required by 40 CFR 63.6650(c)(1) through (4) and (e)(1) through (12). [40 CFR 63.6650(e)]
- (e) The Permittee shall report all deviations as defined by 40 CFR 63, Subpart ZZZZ, in the semi-annual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). [40 CFR 63.6650(f)]

(1) If the Permittee submits a compliance report pursuant to Table 7 of 40 CFR 63, Subpart ZZZZ, along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any emission or operating limitation in 40 CFR 63, Subpart ZZZZ, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report.

(2) However, submission of a compliance report shall not otherwise affect any obligation the Permittee may have to report deviations from permit requirements to IDEM, OAQ.

- (f) The Compliance Reports required shall be submitted to:

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

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

D.1.17 Recordkeeping Requirements Relating to National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

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- (c) The Permittee shall keep the records described in 40 CFR 63.6655(a)(1) through (a)(3), (b)(1) through (b)(3). [40 CFR 63.6655(a)]
- (d) The Permittee shall keep the records required in Table 6 of 40 CFR, Subpart ZZZZ, to show continuous compliance with each applicable emission or operating limitation. [40 CFR 63.6655(d)]
- (e) The Permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1). [40 CFR 63.6660(a)]

- (f) The Permittee shall retain each record for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.6655(b)]
- (e) The Permittee shall keep each copy readily accessible in hard copy or electronic form on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 63.10(b)(1). The Permittee can keep the records off-site for the remaining 3 years. [40 CFR 63.6660(c)]

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: ANR Pipeline Company  
Source Address: 10313 White Oak Avenue, St. John, IN 46373  
Mailing Address: 27725 Stansbury Boulevard, Farmington Hills, MI 48334  
Part 70 Permit No.: T089-6245-00069

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- 40 CFR 63, Subpart ZZZZ
- Other (specify)

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: ANR Pipeline Company  
Source Address: 10313 White Oak Avenue, St. John, IN 46373  
Mailing Address: 27725 Stansbury Boulevard, Farmington Hills, MI 48334  
Part 70 Permit No.: T089-6245-00069

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
<input checked="" type="radio"/> 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
<input type="radio"/> C	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
<input type="radio"/> C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<input checked="" type="radio"/> 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
<input type="radio"/> C	The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

**Page 2**  
**of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    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/deviation:
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:

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

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

Source Name: ANR Pipeline Company  
Source Address: 10313 White Oak Avenue, St. John, IN 46373  
Mailing Address: 27725 Stansbury Boulevard, Farmington Hills, MI 48334  
Part 70 Permit No.: T089-6245-00069

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

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

**THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD:**

<b>Compliance Monitoring Requirement</b> (e.g. Permit Condition D.1.3)	<b>Number of Deviations</b>	<b>Date of each Deviations</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  
COMPLIANCE DATA SECTION**

**Quarterly Report**

Source Name: ANR Pipeline Company  
Source Address: 10313 White Oak Avenue, St. John, IN 46373  
Mailing Address: 27725 Stansbury Boulevard, Farmington Hills, MI 48334  
Part 70 Permit No.: T089-6245-00069  
Parameter: Catalyst Inlet Temperature, Catalyst Pressure Drop, CPMS Operation

**Quarter:** \_\_\_\_\_ **Year:** \_\_\_\_\_

<b>Month</b>	<b>Hours of Operation</b>	<b>Hours of Operation 12 Month Running Total</b>
<b>1</b>		
<b>2</b>		
<b>3</b>		

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

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

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Part 70 Minor Source Modification and Significant Permit Modification

#### Source Background and Description

**Source Name:** ANR Pipeline Company, St. John Compressor Station  
**Source Location:** 10313 White Oak Avenue, St. John, Indiana, 46373  
**County:** Lake  
**SIC Code:** 4922  
**Operation Permit No.:** T089-6245-00069  
**Operation Permit Issuance Date:** November 12, 1998  
**Minor Source Modification No.:** 089-20366-00069  
**Significant Permit Modification No.:** 089-20476-00069  
**Permit Reviewer:** Jenny Acker

The Office of Air Quality (OAQ) has reviewed a modification application from ANR Pipeline Company, St John Compressor Station, a natural gas transmission and storage facility, relating to the construction of the following emissions units and pollution control devices:

- (a) A natural gas fueled reciprocating internal combustion internal compressor engine (RICE) (4 stroke lean), identified as E09, with a maximum capacity of two thousand (2000) horsepower, using an oxidization catalyst, identified as C09 to control carbon monoxide (CO) and Hazardous Air Pollutant (HAP) emissions, and exhausting to stack S09.

#### History

On November 12, 2004, ANR Pipeline, St. John Compressor Station, submitted an application to the OAQ requesting to add a new natural gas fueled internal reciprocating internal compressor engine to their existing plant. ANR Pipeline, St. John Compressor Station was issued a Part 70 permit on November 12, 1998.

#### Enforcement Issue

There are no enforcement actions pending.

#### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (F)
S09	engine	21	1.67	6,144	800

#### Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source 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.

### Emission Calculations

See Appendix A pages 1 and 2 of this document for detailed emission calculations.

### Potential to Emit of Modification

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

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential to Emit (tons/yr)
PM	0.68
PM-10	0.68
SO <sub>2</sub>	0.04
VOC	8.06
CO	21.66
NO <sub>x</sub>	24.14

HAPs	Potential to Emit (tons/yr)
1,1,2,2-Tetrachlorethane	2.73E-03
1,1,2-Trichloroethane	2.17E-03
1,1-Dichloroethane	1.61E-03
1,2,4-Trimethylbenzene	9.77E-04
1,2-Dichlorethane	1.61E-03
1,2-Dichloropropane	1.84E-03
1,3-Butadiene	1.82E-02
1,3-Dichloropropene	1.80E-03
2,2,4-Trimethylpentane	1.71E-02
Acetaldehyde	5.71E-01
Acrolein	3.51E-01
Benzene	3.01E-02
Biphenyl	1.45E-02
Carbon Tetrachloride	2.71E-03
Chlorobenzene	2.08E-03
Chloroethane	1.28E-04
Chloroform	1.95E-03
Ethylbenzene	2.71E-03
Ethylene Dibromide	3.03E-03

Formaldehyde	3.61E 00
Methanol	1.71E-01
Methylene Chloride	1.37E-03
n-Hexane	7.58E-02
Naphthalene	5.08E-03
Phenol	1.64E-03
Styrene	1.61E-03
Toluene	1.79E-02
Vinyl Chloride	1.02E-03
Xylene	1.26E-02
<b>Total</b>	<b>4.93</b>

### Justification for Modification

This Part 70 Operating Permit is being modified through a Part 70 Minor Source Modification. This Modification is being performed pursuant to 326 IAC 2-7-10.5(d)(3) as the potential to emit NOx is less than 25 tons per year per a vendor guaranteed emission factor of 1.25 grams/hp-hr which equates to  $3.71 \text{ E}10^{-4}$  lbs NOx emissions per standard cubic foot of fuel.

### County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Primary (portions only)
NO <sub>2</sub>	Attainment
Ozone 1-hr	Severe Nonattainment
Ozone 8-hr	Moderate Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.
- (1) On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NOx threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Lake County has been designated as nonattainment in Indiana for the 1-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
  - (2) VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Nonattainment New Source Review.

- (b) Lake County has been classified as attainment or unclassifiable for CO, PM, and PM-10. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) It has been verified that the source is located south of the nonattainment boundary ie. US 30 for SO<sub>2</sub>. Therefore, SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention fo Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Source Status**

Existing Source PSD or Emission Offset Definition (emissions before controls, based upon 8760 hours of operation per year at rated capacity of and/or as otherwise limited):

Pollutant	Actual Emissions (tons/year)
PM	Less than 250
PM-10	Less than 250
SO <sub>2</sub>	Greater than 250
VOC	Greater than 25
CO	Greater than 250
NO <sub>x</sub>	Greater than 250
HAP (specify)	Greater than 10 for any one HAP and Less than 25 total HAP

- (a) This existing source is a major stationary source because an attainment regulated source is emitted at a rate of 250 tons per year or more and it is not one of the 28 listed source categories.
- (b) These emissions are based upon Part 70 Operating Permit # T089-6245-00069.

**Potential to Emit of Modifications After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after the issuance of this Part 70 source modification.

Process/Facility	Potential to Emit (tons/year)						
	PM	PM10	SO <sub>2</sub>	VOC	CO	NOx	HAPs
E09	0.68	0.68	0.04	8.06	1.52	24.14	4.93

This modification to an existing major stationary source is not major because the emission increase of VOC and NOx is limited to less than the Emission Offset significant levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

## Federal Rule Applicability

### NSPS

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

### NESHAPs

- (b) Reciprocating internal combustion engines (RICE) are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) [40 CFR 63, Subpart ZZZZ]. E09, a 4 stroke lean burn stationary RICE, is required to comply with this NESHAP upon startup as construction commenced December 2004 [40 CFR 63.6365(a)(3)], the rating is equal to two thousand (2000) braking horsepower, and it is located at a major source for HAP emissions. [40 CFR 63.6590(a)]
- (c) The Permittee will comply with the emission limitation to reduce CO emissions by ninety three (93) percent or more. [40 CFR 63, Subpart ZZZZ, Table 2a(2)(a)], will use an oxidation catalyst to lower emissions, and install a Continuous Parameter Monitoring System (CPMS). Therefore, the Stationary RICE (E09) is subject to the following conditions:
- (1) Emission Limitations pursuant to 40 CFR 63, Subpart ZZZZ, Table 2a(2)(a).
  - (2) Operating Limitations pursuant to 40 CFR 63, Subpart ZZZZ, Table 2b(1)(a) and (b).
  - (3) Subsequent Performance Test pursuant to 40 CFR 63, Subpart ZZZZ, Table 3(1).
  - (4) Requirements for Performance Test pursuant to 40 CFR 63, Subpart ZZZZ, Table 4(1).
  - (5) Initial Compliance with Emission Limitations and Operating Limitations pursuant to 40 CFR 63, Subpart ZZZZ, Table 5(1).
  - (6) Continuous Compliance with Emission Limitations and Operating Limitations pursuant to 40 CFR 63, Subpart ZZZZ, Table 6(1).
  - (7) Requirements for Reports pursuant to 40 CFR 63, Subpart ZZZZ, Table 7(1) and (2).
  - (8) Applicability of General Provisions To Subpart ZZZZ pursuant to 40 CFR 63, Subpart ZZZZ, Table 8.

## State Rule Applicability – Entire Source

326 IAC Nonattainment New Source Review

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

The emissions increase associated with this modification is less than PSD significant levels. Therefore, 326 IAC 2-2 does not apply.

#### 326 IAC 2-3 (Emission Offsets)

The emissions increase associated with this modification is less than the Emission Offset significant levels. Therefore, 326 IAC 2-3 does not apply.

### State Rule Applicability – Individual Facilities

#### 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

Pursuant to 326 IAC 2-4.1-1(b)(2) the operation of a natural gas-fired reciprocating compressor engine (4 stroke lean), identified as E09, is specifically regulated by a standard issued pursuant to Section 112(d), 112(h), or 112(j) of the CAA. Therefore, 326 IAC 2-4.1 does not apply.

#### 326 IAC 6-1-2 (Particulate Emission Limitations)

Pursuant to 326 IAC 6-1-2(a), particulate Emissions from E09 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three hundredths (0.03) gram per dry standard foot).

#### 326 IAC 6-1-10.1 (Lake County PM-10 Emission Requirements)

ANR Pipeline is not a listed source, facility or operation. Therefore, 326 IAC 6-1-10.1 does not apply.

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

E09 does not have a potential to emit greater than twenty-five (25) tons per year or ten (10) pounds per hour of Sulfur Dioxide. Therefore, 326 IAC 7-1.1 does not apply.

#### 326 IAC 7-4 (Emissions Limitations by County)

E09 shall burn only Natural gas. Therefore, 326 IAC 7-4 does not apply.

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

Pursuant to 326 IAC 8-7-1, E09 does not meet any applicability requirements. Therefore, 326 IAC 8-7 does not apply.

### Testing Requirements

#### 326 IAC 2-7-6(1),(6) and [326 IAC 2-1.1-11

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

### Compliance Requirements

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

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

The instruments used for determining the pressure and temperature shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

## **Conclusion**

The construction and operation of this RICE, identified as E09, shall be subject to the conditions of minor source modification (MSM) 089-20366-00069 and significant permit modification (SPM) 089-20476-00069.

**Appendix A: Emission Calculations  
Natural Gas Fired Combustion Engines  
4-Stroke Lean  
Emissions**

**Company Name:** ANR Pipeline - St. John  
**Address City IN Zip:** 10313 White Oak Avenue  
**Permit Number:** 20366  
**Plt ID:** 089-20366-00069  
**Reviewer:** Jenny Acker  
**Date:** 11/18/2004

Unit	Specific Heat Capacity (Btu/hp-hr)	Rating (Hp)
E09	7800	2000

Pollutant Emissions							
Pollutant	PM	PM10	PM2.5	SO2	VOC	CO	CO Controlled to 93%
Emission Factor in lb/MMBtu	9.91E-03	9.91E-03	9.91E-03	5.88E-04	1.18E-01	3.17E-01	3.17E-01
E09 Emissions (lbs/hr)	0.155	0.155	0.155	0.009	1.841	4.945	0.346
<b>Total Potential Emission (tpy)</b>	<b>0.68</b>	<b>0.68</b>	<b>0.68</b>	<b>0.04</b>	<b>8.06</b>	<b>21.66</b>	<b>1.52</b>

Emission Unit / Description	<sup>1)</sup> Emission Factor (lbs of NOx/scf fuel)	Potential NOx Emissions (lbs/hr)	Potential NOx Emissions (tpy)
E09	3.71E-04	0.00	0.01

**Methodology**

Emission Factors:

CO emission factor from AP-42, Chapter 3.2, Table 3.2-2, SCC #2-02-002-54. Based on 90-105% load  
SO<sub>2</sub>, VOC, and PM emission factor from AP-42, Chapter 3.2, Table 3.2-2, SCC #2-02-002-54  
PM10 and PM2.5 emission factors utilized PM (condensable) emission factor from AP-42, Chapter 3.2, Table 3.2-2, SCC #2-02-002-54 similar unit emissions stack testing.

Potential Emissions (lbs/hr) (excluding NOx) = Emission Factor \* Specific Heat Capacity(Btu/hp-hr) \* (1MMBtu/1,000,000 Btu) \* Rating(hp)  
Potential Emissions (tpy) (excluding NOx) = Potential Emissions(lbs/hr) \* 8760(hr/yr) / 2000(lbs/ton)

<sup>1)</sup> NOx Vendor Guaranteed Emission Factor (grams/hp-hr) conversion to NOx Emission Factor (lbs/scf fuel)  
= Vendor Emission Factor \* lb/453.924 grams \* Heat Capacity of Natural Gas \* Specific Heat Capacity of E09  
= 1.25 (grams/hp-hr) \* lb/453.924 grams \* 1050 btu/scf \* hp-hr/7800 btu

Maximum Fuel Rate E09 (scf/hr) = Specific Heat Capacity E09 (btu/hp-hr) \* Rating(hp) \* 1/Heat Capacity of Natural Gas(btu/scf)  
= 7800 (btu/hp-hr) \* 2000 (hp) \* 1/1050 (btu/scf)  
= 14857 scf/hr

Potential Emissions NOx (lbs/hr) = NOx Emission Factor \* Maximum Fuel Rate E09  
Potential Emissions NOx (tpy) = Potential Emissions NOx (lbs/hr) \* 8760(hr/yr) / 2000(lbs/ton)

**Appendix A: Emission Calculations  
Natural Gas Fired Combustion Engines  
4-Stroke Lean  
HAP Emissions**

**Company Name:** ANR Pipeline - St. John  
**Address City IN Zip:** 10313 White Oak Avenue  
**Permit Number:** 20366  
**Pit ID:** 089-20366-00069  
**Reviewer:** Jenny Acker  
**Date:** 11/18/2004

Unit	Specific Heat Capacity (Btu/hp-hr)	Rating (Hp)
E09	7800	2000

HAPs Emissions - Uncontrolled			
Pollutant	Emission Factor (lbs/MMBtu)	Emissions (lbs/hr)	Emissions (tpy)
1,1,2,2-Tetrachlorethane	4.00E-05	6.24E-04	2.73E-03
1,1,2-Trichloroethane	3.18E-05	4.96E-04	2.17E-03
1,1-Dichloroethane	2.36E-05	3.68E-04	1.61E-03
1,2,4-Trimethylbenzene	1.43E-05	2.23E-04	9.77E-04
1,2-Dichloroethane	2.36E-05	3.68E-04	1.61E-03
1,2-Dichloropropane	2.69E-05	4.20E-04	1.84E-03
1,3-Butadiene	2.67E-04	4.17E-03	1.82E-02
1,3-Dichloropropene	2.64E-05	4.12E-04	1.80E-03
2,2,4-Trimethylpentane	2.50E-04	3.90E-03	1.71E-02
Acetaldehyde	8.36E-03	1.30E-01	5.71E-01
Acrolein	5.14E-03	8.02E-02	3.51E-01
Benzene	4.40E-04	6.86E-03	3.01E-02
Biphenyl	2.12E-04	3.31E-03	1.45E-02
Carbon Tetrachloride	3.97E-05	6.19E-04	2.71E-03
Chlorobenzene	3.04E-05	4.74E-04	2.08E-03
Chloroethane	1.87E-06	2.92E-05	1.28E-04
Chloroform	2.85E-05	4.45E-04	1.95E-03
Ethylbenzene	3.97E-05	6.19E-04	2.71E-03
Ethylene Dibromide	4.43E-05	6.91E-04	3.03E-03
Formaldehyde	5.28E-02	8.24E-01	3.61E+00
Methanol	2.50E-03	3.90E-02	1.71E-01
Methylene Chloride	2.00E-05	3.12E-04	1.37E-03
n-Hexane	1.11E-03	1.73E-02	7.58E-02
Naphthalene	7.44E-05	1.16E-03	5.08E-03
Phenol	2.40E-05	3.74E-04	1.64E-03
Styrene	2.36E-05	3.68E-04	1.61E-03
Toluene	4.08E-04	6.36E-03	2.79E-02
Vinyl Chloride	1.49E-05	2.32E-04	1.02E-03
Xylene	1.84E-04	2.87E-03	1.26E-02
<b>Total HAP Emissions</b>		<b>1.13 (lbs/hr)</b>	<b>4.93 (tpy)</b>

**Methodology**

Emission Factors are from AP-42, Chapter 3.2, Table 3.2-2, SCC #2-02-0002-54

Potential Emissions (lbs/hr) = Emission Factor(lbs/Mmbtu) \* Specific Heat Capacity(Btu/hp-hr) \* (1MMBtu/1,000,000 Btu) \* Rating(hp)

Potential Emissions (tpy) = Potential Emissions(lbs/hr) \* 8760(hr/yr) / 2000(lbs/ton)