



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: July 1, 2005

RE: ANR Pipeline, St. John Compressor Station / SPM 089-20476-00069

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 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.

Mitchell E. Daniels, Jr.
Governor

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July 1, 2005

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

Re: 089-20476
First Significant Permit Modification to
Part 70 No.: T 089-6245-00069

Dear Mr. David Jones:

ANR Pipeline, St. John was issued a Part 70 permit (T089-6245-00069) on November 12, 1998 for a natural gas transmission and storage facility. A letter requesting changes to this permit was received on November 12, 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 construction and operation of a natural gas fueled reciprocating internal combustion internal compressor engine (RICE) with a maximum capacity of two thousand (2000) horsepower.

All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire permit as modified is being provided.

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 Jenny Acker, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46204, or 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

JLA

cc: File – Lake County
U.S. EPA, Region V
Northwest Regional Office
Lake County Health Department
Air Compliance Section Inspector – Ramesh Tejuja
Compliance Data Section



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100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
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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.

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 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 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 5, 2002
Third Administrative Amendment No.: 089-19920-00069, issued January 31, 2005

First Significant Permit Modification No.: 089-20476-00069	Condition Affected: A.1, B.26 Section Affected: D.2
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 1, 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)]

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:	Severe Nonattainment for ozone under the 1-hour standard Moderate Nonattainment for ozone under the 8-hour standard Nonattainment for PM2.5 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)]

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

- (a) Four (4) natural gas fueled reciprocating internal combustion internal engine compressors, installed in 1951, identified as ID #'s E01 through E04, with a maximum capacity of 1550 Horsepower each, and exhausting to stacks # S01 through S04.
- (b) Two (2) natural gas fueled reciprocating internal combustion internal engine compressors, installed in 1972 and 1973, identified as ID #'s E06 and E07, with a maximum capacity of 12000 Horsepower each, and exhausting to stacks # S06 and S07.
- (c) One (1) intermittent use generator operating for 3,000 hours or less per year, installed in 1995, identified as ID# G08, with a capacity of 825 Horsepower, and exhausting to stack #S08.
- (d) One (1) storage tank, installed in 1972, identified as ID# TK004, with a capacity of 12,000 gallons.
- (e) 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.

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

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

- (a) 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]

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 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted 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.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 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, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

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

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

B.6 Severability [326 IAC 2-7-5(5)]

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

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

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

- (b) 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, 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, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

Indiana Department of Environmental Management
Compliance Data Section, 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 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 compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, 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;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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
Indianapolis, Indiana 46204

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly

signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and the 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
Telephone Number: 1-888-209-8892
Facsimile Number: 219-757-0267

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency 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) for sources subject to

this rule after the effective date of this rule. 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 compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is 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.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. 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:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

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

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

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

within ten (10) calendar days from the date of the discovery of the deviation.
- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (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 provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (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).

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. [326 IAC 2-5-3]
- (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.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with 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 should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

B.20 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(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) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.21 Operational Flexibility [326 IAC 2-7-20]

- (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 approval required by 326 IAC 2-1 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), (c)(1), and (e)(2).

- (b) 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 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.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, 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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, *and* IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.24 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. 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).
- (c) IDEM, OAQ shall reserve the right to issue a new permit.

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

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

permit fee.

B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate 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.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) 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.

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)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (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 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 emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) 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 that the inspector be accredited is federally enforceable.

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods 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 Permittee shall

submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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

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

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule 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).

C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the 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 than one (1) 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.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Pressure Gauge Specifications

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 (" 2%) of full scale reading.

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]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures in June, 1978.
- (b) 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.
- (c) 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.
- (d) 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.
- (e) 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 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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM,

OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purpose of fee assessment.

The 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

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

C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

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

- (a) Records of all required monitoring data 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 and available upon the request of an IDEM, OAQ, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) 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)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (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, any report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) 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.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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)]

- (a) Four (4) natural gas fueled reciprocating internal combustion internal engine compressors, installed in 1951, identified as ID #'s E01 through E04, with a maximum capacity of 1550 Horsepower each, and exhausting to stacks # S01 through S04.
- (b) Two (2) natural gas fueled reciprocating internal combustion internal engine compressors, installed in 1972 and 1973, identified as ID #'s E06 and E07, with a maximum capacity of 12000 Horsepower each, and exhausting to stacks # S06 and S07.
- (c) One (1) intermittent use generator operating for 3,000 hours or less per year, installed in 1995, identified as ID# G08, with a capacity of 825 Horsepower, and exhausting to stack #S08.
- (d) One (1) storage tank, installed in 1972, identified as ID# TK004, with a capacity of 12,000 gallons.

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

D.1.1 General Operation

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

D.1.2 Particulate Matter Emission Limitation

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations: Specified), facilities shall not discharge to the atmosphere gas streams which contain particulate matter in excess of 0.03 grains per dry standard cubic foot (g/dscf).

Compliance Determination Requirements

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

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

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the emission limit shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.1.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2, the Permittee shall maintain records documenting that all combustion facilities are fired only with natural gas.
- (b) To comply with 326 IAC 8-9-6(a), the Permittee shall maintain all records required by 326 IAC 8-9-6(b) for the life of each vessel.
- (c) To document compliance with the 3,000 hour per year limit on the hours of operation for the 825 HP intermittent use generator, the source shall maintain a log of the hours the generator is in use.

- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (e) 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.2.1 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.2.2 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.2.3. [40 CFR 63.6(e)(1)(ii)]
- (c) To the extent that an unexpected event arises during a startup, shutdown, or malfunction, the Permittee shall comply by minimizing emissions during such a startup, shutdown, and malfunction event consistent with the safety and good air pollution control practices. [40 CFR 63.6(e)(1)(ii)]

D.2.3 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.2.4 National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

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

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

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

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

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

D.2.5 Continuous Compliance Requirements Relating to National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

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

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

D.2.6 Part 70 Minor Source Modifications [326 IAC 2-7-10.5(d)(3)]

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

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

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

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

D.2.7 Particulate [326 IAC 6-1-2]

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.2.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility (E09 engine) and any control devices.

Compliance Determination Requirements

D.2.9 Testing Requirements Relating to National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

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

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

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

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

- (g) The Permittee shall normalize the carbon monoxide (CO) concentrations at the inlet and outlet of the control device to a dry basis and to 15 percent oxygen, or an equivalent percent carbon dioxide (CO₂). If pollutant concentrations are to be corrected to 15 percent oxygen and CO₂ concentration is measured in lieu of oxygen concentration measurement, a CO₂ correction factor is needed. Calculate the CO₂ correction factor as described in 40 CFR 63.6620(e)(2)(i) through (iii): [40 CFR 63.6620(e)(2)]
- (1) Calculate the fuel-specific F_o value for the fuel burned during the test using values obtained from Method 19, section 5.2, and the following equation: [40 CFR 63.6620(e)(2)(i)]

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

Where: F_o = Fuel factor based on the ratio of oxygen volume to the ultimate CO₂ volume produced by the fuel at zero percent excess air.
0.209 = Fraction of air that is oxygen, percent/100.
 F_d = Ratio of the volume of dry effluent gas to the gross calorific value of the fuel from Method 19, dsm^3/J ($\text{dscf}/10^6 \text{ Btu}$).
 F_c = Ratio of the volume of CO₂ produced to the gross calorific value of the fuel from Method 19, dsm^3/J ($\text{dscf}/10^6 \text{ Btu}$).

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

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

Where: X_{CO_2} = CO₂ correction factor, percent.
5.9 = 20.9 percent O₂-15 percent O₂, the defined O₂ correction value, percent.

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

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

Where: %CO₂ = Measured CO₂ concentration measured, dry basis, percent.

Where: Cd = Measured pollutant concentration (carbon monoxide) on a dry basis.

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

D.2.10 Continuous Compliance Demonstration Provisions Relating to National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63.6630]

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

- (d) 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.2.3. [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.2.11 Initial Compliance Requirements Relating to National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63.6630]

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

D.2.12 Testing Requirements [326 IAC 2-7-6(1),(6)] [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 per condition D.2.6 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.2.13 Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no monitoring requirements applicable to this facility.

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

D.2.14 Notification, Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

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

D.2.15 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
Indianapolis, Indiana 46204
- (f) The Notifications require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.2.16 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
Indianapolis, Indiana 46204
- (g) The Compliance reports require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

D.2.17 Recordkeeping Requirements Relating to National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

- (a) The Permittee shall keep the records described in 40 CFR 63.6655(a)(1) through (a)(3), (b)(1) through (b)(3). [40 CFR 63.6655(a)]

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

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)
- 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
100 North Senate Avenue
Indianapolis, Indiana 46204
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 ₂ , VOC, NO _x , 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:

<u>Compliance Monitoring Requirement</u> (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations
--	-----------------------------	--------------------------------

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, Indiana 46373
Mailing Address: 27725 Stansbury Boulevard, Farmington Hills, MI 48334
Permit No.: T089-6245-00069
Parameter: Hour of Operation for the 825 HP Intermittent use Natural Gas Generator
Limit: 3,000 hours per twelve (12) consecutive month period

Quarter: _____ Year: _____

Month	Hours of Operation	Hours of Operation 12 Month Running Total
1		
2		
3		

- 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 and 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.

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 ₂	0.04
VOC	8.06
CO	21.66
NO _x	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-Dichloroethane	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
Total	4.93

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 E10⁻⁴ 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 ₂	Primary Nonattainment (portions only)
NO ₂	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 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 Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

- (b) Lake County has been classified as attainment or unclassifiable for CO, PM-10, and Lead. 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 SO₂. Therefore, SO₂ emissions were reviewed pursuant to the requirements for Prevention of 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:

Pollutant	Actual Emissions (tons/year)
PM	Less than 250
PM-10	Less than 250
SO ₂	Greater than 250
VOC	Greater than 25 but less than 100
CO	Greater than 250
NO _x	Greater than 100
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 ₂	VOC	CO	NOx	HAPs
RICE, E09	0.68	0.68	0.04	8.06	1.52	24.14	4.93
Major Source Significant Levels	25	15	40	25	100	40	-

This modification to an existing major stationary source is not major because the emission increases are limited to less than the Emission Offset significant levels and the PSD significant levels. Therefore, the Emission Offset, and PSD 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)]. The stationary RICE (E09) 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 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) grains 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 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 Permittee shall comply with all applicable monitoring requirements as required by 40 CFR 63, Subpart ZZZZ.

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.

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

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
Significant Permit Modification No.:	089-20476-00069
Permit Reviewer:	Jenny Acker

On February 27, 2005, the Office of Air Quality (OAQ) had a notice published in The Times in Munster, Indiana and The Post Tribune in Merrillville, stating that ANR Pipeline Company had applied for a Significant Permit Modification to a Part 70 Operating Permit to operate a natural gas fueled reciprocating internal combustion internal compressor engine at the St. John Compressor Station. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Written comments were received from Shirley Niven on March 3, 2005. These comments and IDEM, OAQ responses, including changes to the permit (where language deleted is shown with ~~strikeout~~ and that added is shown in **bold**) are as follows:

Comment 1

In the summer, especially, there are big plumes of yellow smoke that rise from the stacks. We don't know what we are breathing as it is, and certainly do not want more pollution.

Response 1

ANR Pipeline, St. John Compressor Station does not have any current enforcement issues pending, nor has ANR Pipeline St. John Compressor Station been subject at any time in the past to enforcement. ANR Pipeline, St. John Compressor Station submits annual emission reporting statements and has at all times emitted below their permitted levels.

IDEM, OAQ, Northwest Regional Office serves Lake, LaPorte, and Porter County and is available to address any questions or concerns.

Northwest Regional Office
8315 Virginia St., Ste. 1
Merrillville, IN 46410
Director: Malini Goel

Phone: (219) 757-0265
Phone: (888) 209-8892 (toll free within Indiana)
Fax: (219) 757-0267

Comment 2

The pipeline also backfires (according to ANR) several times a year, the most recently a few weeks ago. It sounds like the place has exploded, shaking the earth like an earthquake for at least a 1/2 mile radius surrounding the plant (I know people who live that far and have felt it). I am also concerned for my property. All of the vibrating has caused things to fall off of shelves, mirrors to rattle all night long, etc. What is this doing to our foundations, and is ANR willing to repair them should they crack? Several neighbors have also noticed more than our fair share of drywall cracks (the houses all built by different builders) that we believe to be from the ground vibrations. There is also the issue of noise that keeps you awake all night in the summer like a semi parked in your driveway, and a strong odor of natural gas periodically.

Response 2

IDEM acknowledges your concerns regarding the potential property damage issues. However, IDEM does not have legal authority to regulate zoning, odor or noise. For zoning issues, please contact your local zoning board. For noise and odor issues, please contact your local board of health.

Written comments were received from ANR Pipeline on April 19, 2005. These comments and IDEM, OAQ responses, including changes to the permit (where language deleted is shown with ~~strikeout~~ and that added is shown in **bold**) are as follows:

Comment 3

D.2.8 – Please change the word “facility” to “engine 09” because the permit modification is specifically for the operation of the 09 engine and does not involve other units in the facility.

Response 3

The engine specific to this permit modification is referenced as “E09” elsewhere in the permit. Therefore, the permit is revised as follows:

D.2.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility (**E09 engine**) and any control devices.

Comment 4

D.2.9(g)(3) – Please define the term “Cd” in Equation 4 because the term is not defined in the regulation.

Response 4

The following response was provided by Terry Harrison of the U.S.EPA, “Cd = measured pollutant concentration (in this case carbon monoxide or formaldehyde) on a dry basis”. The permit has been revised to include the definition as follows:

D.2.9 Testing Requirements Relating to National Emission Standards (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

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

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

Where: %CO₂ = Measured CO₂ concentration measured, dry basis, percent.

Where: Cd = Measured pollutant concentration (carbon monoxide) on a dry basis.

Upon further review, the OAQ has decided to make the following changes to the permit modification (bolded language has been added, the language with a line through it has been deleted).

1. U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia challenging the U.S.EPA's designation of Nonattainment 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 PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See State Rule Applicability for the source section.

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Lake County has been designated as nonattainment for the 8-hour ozone standard. The following has been added to A.1 General Information:

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

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: **Severe Nonattainment for ozone under the 1-hour standard**
Moderate nonattainment for ozone under the 8-hour standard
Nonattainment for PM2.5
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

2. Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by the U.S.EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, the

condition reflecting this rule will be incorporated into your permit as follows:

B.26 Credible Evidence [326 IAC 2-7-5(3)]~~[62 Federal Register 8313]~~[326 IAC 2-7-6] **[62 FR 8314]****[326 IAC 1-1-6]**

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non-compliance.~~

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

3. IDEM, OAQ's address has been revised throughout the permit as follows:

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