INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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*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: January 22, 2008

RE: ANR Pipeline Company / 089-23456-00069

FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

# Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 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, Suite N 501E, 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.



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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 impractible 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.

Enclosures
FNTV-PMOD.doc12/3/07

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Mr. Juan J. Rios
ANR Pipeline Company
P.O. Box 2446
Houston, TX 77252

January 22, 2008

Re: 089-23456-00069
Significant Permit Modification to Part 70 Operating
Permit No.: T089-6245-00069

Dear Mr. Rios:

ANR Pipeline-St. John Compressor Station was issued a Part 70 Operating Permit (T089-6245-00069) on November 12, 1998, for the operation of a stationary natural gas compression station. The letter requesting the changes was received on August 2, 2006. Also, letters requesting administrative amendment to this permit were received on March 20, 2007 and August 24, 2007. The request for permit changes was determined to be as Significant Permit Modification (SPM). The requests for Administrative Amendment (AA) were combined by our office with SPM to streamline the permit process. Pursuant to the provisions of 326 IAC 2-7-12 and 326 IAC 2-7-11, the SPM and AA are hereby approved as described in the attached Technical Support Document.

The modifications consist of installing low emission combustion (LEC) technology to control NOx emissions from the two (2) existing natural gas fired reciprocating internal combustion engines, E06 and E07, and incorporating the compliance plan, as required by 326 IAC 10-5, into the Part 70 Operating Permit.

Our office has been notified that a Director of Operations or Operations Manger (Duly Authorized Representative (DAR) of the Vice President of a principal business function) has taken the responsibilities as Responsible Official (RO).

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire Part 70 Operating Permit as modified.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, and ask for Mehul Sura or extension 3-1782, or dial (317) 233-1782.

Original signed by,

Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document
Modified Permit
mns

cc: File – Lake County
U.S. EPA, Region V
Lake County Health Department
Northwest Regional Office
Air Compliance Section Inspector – Rick Massoels
Compliance Data Section
Administrative and Development

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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:<br>Janet G. McCabe, Assistant Commissioner<br>Office of Air Quality | Issuance Date: November 12, 1998<br><br>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, issued July 1, 2005
Fourth Administrative Amendment No.: 089-21973-00069, issued December 2, 2005

| Second Significant Permit Modification No: 089-23456-00069 | |
|---|---|
| Original signed by:<br><br><br><br>Matthew Stuckey, Deputy Branch Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: January 22, 2008 |

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**Certification**
**Emergency/Deviation Occurrence Report**
**Quarterly Compliance Monitoring Report**

## 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.

| | |
|---|---|
| Source Address: | 10313 White Oak Avenue, St. John, IN 46373 |
| Mailing Address: | 750 Old Hickory Blvd, Suite 190, Brentwood, TN 37027 |
| SIC Code: | 4922 |
| County Location: | Lake |
| County Status: | Severe Nonattainment for ozone under the 1-hour standard<br>Nonattainment for ozone under the 8-hour standard<br>Nonattainment for PM2.5<br>Attainment for all other criteria pollutants |
| Source Status: | Part 70 Permit Program<br>Major Source under Emission Offset Rules and PSD Rules<br>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 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 engines compressors, installed in 1972 and 1973, identified as ID #s E06 and E07, equipped with Low Emission Combustion (LEC) technology, 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 four stroke lean burn reciprocating internal combustion engine (RICE) compressor, 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 APermit 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
61-53 IGCN 1003
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
61-53 IGCN 1003
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 Aresponsible 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
61-53 IGCN 1003
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) PMPs 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: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

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
61-53 IGCN 1003
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 Aresponsible 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
61-53 IGCN 1003
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 Aresponsible 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
61-53 IGCN 1003
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
61-53 IGCN 1003
Indianapolis, Indiana 46204

Any such application should be certified by the Aresponsible 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
61-53 IGCN 1003
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 Aresponsible 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 Source Modification Requirement [326 IAC 2-7-10.5]

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

(b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2 and/or 326 IAC 2-3 (for sources located in NA areas).

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
61-52 IGCN 1003
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
61-53 IGCN 1003

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
61-53 IGCN 1003
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 Aresponsible 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) (ARegulated 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
61-51 IGCN 1003
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, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) 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)][326 IAC 2-1.1-11]

(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
61-53 IGCN 1003
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 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 S0.

(b) Two (2) natural gas fueled reciprocating internal combustion engine compressors, installed in 1972 and 1973, identified as ID #s E06 and E07, equipped with Low Emission Combustion (LEC) technology, 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.

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

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

D.1.1 Particulate Matter Emission Limitation

Pursuant to 326 IAC 6.8-1-2(a), facilities shall not discharge to the atmosphere gas streams which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (g/dscf).

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

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

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Emission Units E06 and E07.

**Compliance Determination Requirements**

D.1.4 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.1.5 Nitrogen Oxides (NOx) Emissions

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

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 10-5-4]

(a) Pursuant to 326 IAC 10-5-4(1), within 180 days after the initial start up of Emission Units E06 and E07 with the LEC technology, in order to demonstrate compliance with Condition

D.1.2, the Permittee shall perform an initial performance test for NOx for both Emission Units E06 and E07, consistent with the requirements of 40 CFR 60, Appendix A*. Testing shall be repeated every five (5) years. Testing shall be conducted in accordance with Section C- Performance Testing.

(b) Pursuant to 326 IAC 10-5-4(2), the Permittee shall perform annual performance tests on Emission Units E06 and E07 using portable monitors using ASTM D6522-00 to show compliance with condition D.1.2 (annual performance tests using portable monitors are not required for a given Emission Unit during calendar years when a performance test required by subsection (a) of this Condition is performed on that unit). Alternatively, ANR can use a parametric monitoring program (as specified in 326 IAC 10-5-4(2)(B)) to periodically monitor the source's compliance with the projected $NO_X$ emission rate, after obtaining prior approval from IDEM for the parameter ranges.

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

D.1.7 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, the Permittee shall maintain records documenting that all combustion facilities are fired only with natural gas.

(b) 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) Pursuant to 326 IAC 10-5-5(a), the Permittee shall maintain all records necessary to demonstrate compliance with the requirements of this rule. Each record shall be maintained for a period of two (2) calendar years at the plant at which the subject engine is located. The records shall be made available to the IDEM, OAQ and U.S. EPA upon request. The Permittee shall maintain the following records:

(1) Identification and location of each engine subject to the requirements of this rule.
(2) Calendar date of record.
(3) The number of hours the unit is operated during each ozone season compared to the projected operating hours.
(4) Type and quantity of fuel used.
(5) The results of all compliance tests.
(6) Monitoring data.
(7) Preventative maintenance.
(8) Corrective actions.

(e) Pursuant to 326 IAC 10-5-5(b), the Permittee shall submit results of all compliance tests to IDEM, OAQ within forty-five (45) days after completion of the testing.

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

D.1.8 Reporting Requirements

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

**SECTION D.2 FACILITY OPERATION CONDITIONS**

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

(e) A natural gas fueled four stroke lean burn reciprocating internal combustion engine (RICE) compressor, 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) When actions taken by the Permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) are consistent with the procedures specified in the Permittee's startup, shutdown, and malfunction plan, the Permittee shall keep records for that event which demonstrate that the procedures specified in the plan were followed. [40 CFR 63.6(e)(3)(iii)]

(1) The Permittee shall keep records of these events as specified in Sec. 63.10(b), including records of the occurrence and duration of each startup, shutdown, or

malfunction of operation and each malfunction of the air pollution control and monitoring equipment.

(2) Furthermore, the Permittee shall confirm that actions taken during the relevant reporting period during periods of startup, shutdown, and malfunction were consistent with the affected source's startup, shutdown and malfunction plan in the semiannual (or more frequent) startup, shutdown, and malfunction report required in Sec. 63.10(d)(5).

(b) When actions taken by the Permittee during a startup, shutdown, or malfunction (including an action taken to correct a malfunction) are not consistent with the procedures specified in the startup, shutdown, and malfunction plan, and the stationary RICE (E09) exceeds any applicable emission limitation in the relevant emission standard, then the Permittee shall: [40 CFR 63.6(e)(3)(iv)]

(1) Record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan,

(2) Followed by a letter within 7 working days after the end of the event, in accordance with Sec. 63.10(d)(5).

(c) The Permittee shall maintain a current startup, shutdown, and malfunction plan and must make the plan available upon request for inspection and copying by IDEM, OAQ, in accordance with the provisions in 40 CFR 63.6(e)(3)(v). [40 CFR 63.6(e)(3)(v)]

(d) Based on the results of a determination made under 40 CFR 63.6(e)(1)(i), IDEM, OAQ, may require the Permittee to make changes to the startup, shutdown, and malfunction plan. [40 CFR 63.6(e)(3)(vii)]

(e) The Permittee may periodically revise the startup, shutdown, and malfunction plan for the Stationary RICE (E09) as necessary to satisfy the requirements of 40 CFR 63.6(e)(3) or to reflect changes in equipment or procedures at the Stationary RICE (E09). Unless IDEM, OAQ provides otherwise, the Permittee may make such revisions to the startup, shutdown, and malfunction plan without prior approval by IDEM, OAQ. However, each such revision to a startup, shutdown, and malfunction plan must be reported in the semiannual report required by Sec. 63.10(d)(5). [40 CFR 63.6(e)(3)(viii)]

(f) Whenever the startup, shutdown, and malfunction plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the startup, shutdown, and malfunction plan at the time the Permittee developed the plan, the Permittee shall revise the startup, shutdown, and malfunction plan within 45 days after the event to include detailed procedures for operating and maintaining the source during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control and monitoring equipment. [40 CFR 63.6(e)(3)(viii)]

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

D.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 NOx shall not exceed 0.000371 pounds of NOx per standard cubic foot of fuel. This rate will limit the potential to emit of NOx 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 | NOx Emissions (lbs NOx/scf fuel) | NOx 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 $O_2$ at the inlet and outlet of the control device using a portable CO and $O_2$ analyzer and according to ASTM D6522-00. Measurements to be made at the same time as the measurements for CO concentration. [40 CFR 63, Subpart ZZZZ, Table 4(1)(a)(i)]

(2) Measure the CO at the inlet and outlet of the control device using a portable CO and $O_2$ analyzer and according to ASTM D6522-00. The CO concentration must be at fifteen (15) percent $O_2$ 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)

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

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

(g) The Permittee shall normalize the carbon monoxide (CO) concentrations at the inlet and outlet of the control device to a dry basis and to 15 percent oxygen, or an equivalent percent carbon dioxide ($CO_2$). If pollutant concentrations are to be corrected to 15 percent oxygen and $CO_2$ concentration is measured in lieu of oxygen concentration measurement, a $CO_2$ correction factor is needed. Calculate the $CO_2$ 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)]

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

Where: $F_o$ = Fuel factor based on the ratio of oxygen volume to the ultimate $CO_2$ 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 (dscf/10 $^6$ Btu).
$F_c$ = Ratio of the volume of $CO_2$ produced to the gross calorific value of the fuel from Method 19, dsm $^3$/J (dscf/10 $^6$ Btu).

(2) Calculate the $CO_2$ correction factor for correcting measurement data to 15 percent oxygen, as follows: [40 CFR 63.6620(e)(2)(ii)]

$$X_{CO2} = \frac{5.9}{F_O} \qquad \text{(Eq. 3)}$$

Where: $X_{CO2}$ = $CO_2$ correction factor, percent.
5.9 = 20.9 percent $O_2$-15 percent $O_2$, the defined $O_2$ correction value, percent.

(3) Calculate the NOx and $SO_2$ gas concentrations adjusted to 15 percent $O_2$ using $CO_2$ as follows: [40 CFR 63.6620(e)(2)(iii)]

$$C_{adj.} = Cd\ \frac{X_{CO2}}{\%CO_2} \qquad \text{(Eq. 4)}$$

Where: $\%CO_2$ = Measured $CO_2$ 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) Consistent with 40 CFR 63.6(e) and 63.7(e)(1), deviations from the emission or operating limitations that occur during a period of startup, shutdown, or malfunction are not violations if the Permittee demonstrates to the IDEM, OAQ's satisfaction that the Permittee was operating in accordance with the startup, shutdown, and malfunction plan. For new, reconstructed, and rebuilt stationary RICE, deviations from the emission or operating limitations that occur during the first 200 hours of operation from engine startup (engine burn-in period) are not violations. [40 CFR 63.6640(d)]

(e) The Permittee shall report each instance in which the applicable requirements of 40 CFR 63, Subpart ZZZZ, Table 8, are not 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

D.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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

D.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 Blvd, Suite 200, 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**
**MC 61-53 IGCN 1003**
**Indianapolis, Indiana 46204-2251**
**Phone: 317-233-0178**
**Fax: 317-233-6865**

## 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 Blvd, Suite 200, 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<br>1. This is an emergency as defined in 326 IAC 2-7-1(12)<br>X The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and<br>X The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
| 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)<br>X 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<br>Describe:<br><br>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 DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: ANR Pipeline Company
Source Address: 10313 White Oak Avenue, St. John, IN 46373
Mailing Address: 27725 Stansbury Blvd, Suite 200, Farmington Hills, MI 48334
Part 70 Permit No.: T089-6245-00069

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

**This form consists of 2 pages** Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

## Quarterly Report

Source Name: ANR Pipeline Company
Source Address: 10313 White Oak Avenue, St. John, Indiana 46373
Mailing Address: 27725 Stansbury Blvd, Suite 200, 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 | | |

☐ No deviation occurred in this quarter.

☐ 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

Addendum to the Technical Support Document (ATSD) for a
Part 70 Significant Permit Modification.

## Source Description and Location

| | |
|---|---|
| Source Name: | ANR Pipeline Company – St. John Compressor Station |
| Source Location: | 10313 White Oak Avenue, St. John, IN 46373 |
| County: | Lake |
| SIC Code: | 4922 |
| Part 70 Operation Permit No.: | T089-6245-00069 |
| Part 70 Operation Permit Issuance Date: | November 12, 1998 |
| Significant Permit Modification: | 089-23456-00069 |
| Permit Writer: | Mehul Sura |

## Revocation of Minor Source Modification (MSM) No. 089-25049-00069

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. This Addendum to Technical Support Document becomes part of the Technical Support Document.

On October 16, 2007, ANR Pipeline Company – St. John Compressor Station (herein after referred as ANR) was issued Minor Source Modification (MSM) No. 089-25049-00069 for the installation of low emission combustion (LEC) technology on internal combustion engines E06 and E07. IDEM has reevaluated the Minor Source Modification and has determined that the source's CO emissions did not increase due to the installation of LEC on the engines. This determination is based on the stack test results provided by ANR.

Therefore, the MSM approval No. 089-25049-00069 has been revoked, and the following changes to the TSD are documented in this ATSD. No changes are neccessary to be made in Part 70 Operating Permit No. T089-6245-00069, due to this permitting action. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**.

Change 1: Part 70 Permit Level Determination table of the TSD has been revised as follows:

| Total Emission Increase by the Proposed Modification (Emission Units E06 & E07 only) | | | |
|---|---|---|---|
| Pollutant | PTE Before Modification (tons/year) [(a)] | PTE After Modification (tons/year) [(b)] | Net Difference (tons/year) [(c)] |
| PM | 38 | 38 | 0.0 |
| PM10 | 38 | 38 | 0.0 |
| $SO_2$ | 0.46 | 0.46 | 0.0 |
| VOC | 94.4 | 63.62 | 0.0[(d)] |
| CO | ~~303.65~~**571.24** | 337.2 | ~~33.55~~**0** |
| $NO_X$ | 1900.3 | 1228.3 | 0.0[(d)] |
| HAPs | 48.98 | 48.98 | 0.0 |

(a) PTE before modification with an assumption that each emission unit operates at 8760 hrs/year and without emission controls.

(b) PTE after modification with an assumption that each emission unit operates at 8760 hrs/year with installation of LEC

for NOx controls.

(c) Net Difference = (b) – (a).

(d) Net difference values for NOx**, CO** and VOC are negative numbers (see appendix A for details). These negative numbers are listed as zero (0) for permit level determination purpose.

The above table indicates that ~~CO emissions are increased by 33.55 tons per year~~ **there no emission increases for any criteria pollutant**, due to the proposed modification. ~~This value is less than 100 tons per year but greater than 25 tons year. Therefore, pursuant to 326 IAC 2-7-10.5(d)(3)(D), this modification is subject to the minor source modification requirements.~~ **Therefore no source modification is required for this modification.**

~~Additionally,~~**The** operational requirements **of the engines E06 and E07 equipped with LEC** and the compliance plan pursuant to 326 IAC 10-5 (Nitrogen Oxide Reduction Program for Internal Combustion Engines) will be incorporated into the Part 70 Operating Permit through a significant permit modification because incorporating the Nitrogen Oxide Reduction Program into the Part 70 Operating Permit involves significant changes to existing monitoring, reporting, or record keeping requirements in the Part 70 Operating Permit.

Change 2: PSD Permit Level Determination table of the TSD has been revised as follows:

| Potential to Emit (tons/year) | | | | | | | |
|---|---|---|---|---|---|---|---|
| Process/Emission Unit | PM | PM10 | $SO_2$ | VOC | CO | $NO_X$ | Pb |
| E06 | 0 | 0 | 0.0 | (12.67) | ~~18.51~~**(117.02)** | (336.03) | -- |
| E07 | 0 | 0 | 0.0 | (18.11) | ~~15.03~~**(117.02)** | (336.03) | -- |
| Total for Modification | 0.0 | 0.0 | 0.0 | (30.78) | ~~33.54~~**(234.04)** | (672.06) | -- |
| Significant Levels | 25 | 15 | 40 | 40 | 100 | 40 | 0.6 |

Change 3: The TSD header pages are revised as follows:

ANR Pipeline Company – St. John Compressor Station
St. John, Indiana
Permit Writer: Mehul Sura

~~Second Minor Source Modification No.: 089-25049-00069~~
Second Significant Permit Modification No.: 089-23456-00069

Change 4: Appendix A has been revised.

| | | | | | | |
|---|---|---|---|---|---|---|
| | **Addendum to Appendix A: Emission Calculations** | | | **Page 1 of 2 TSD App A** | | |
| | **Natural Gas-fired Reciprocating Engines** | | | | | |
| | **Company Name:** | **ANR Pipeline - St. John Compressor Station** | | | | |
| | **Address City IN Zip:** | **10313 White Oak Avenue, St. John, IN 46373** | | | | |
| | **~~Source Modification No:~~** | **~~089-25049-00069~~** | | | | |
| | **Permit Modification No:** | **089-23456-00069** | | | | |
| | **Plt ID:** | **089-00069** | | | | |
| | **Reviewer:** | **Mehul Sura** | | | | |
| | **Date:** | **6/15/2007** | | | | |
| **Emission Unit E06** | | | | | | |
| Heat Input Capacity (MMBtu/Hr) | Rated Horsepower (bhp) | | | | | |
| 89.80 | 12000.00 | | | | | |
| **Emission Unit E07** | | | | | | |
| Heat Input Capacity (MMBtu/Hr) | Rated Horsepower (bhp) | | | | | |
| 89.80 | 12000.00 | | | | | |
| **2-Stroke Lean Burn Engines E06 and E07 (Without LEC)** | | | | | | |
| | PM | PM10 | SO2 | $NO_X$ * | VOC | CO**~~****~~** |
| Emission Factor (lb/MMBtu) | 0.05 | 0.05 | 0.00 | | 0.12 | ~~0.39~~ |
| Emission Factor (g/bhp-hr) | | | | 8.20 | | |
| **Emission Factor (lb/hr)** | | | | | | **65.21** |
| Potential Emission (tons/yr) | 38.00 | 38.00 | 0.46 | 1900.30 | 94.40 | ~~303.65~~ **571.24** |
| **PTE before LEC (tons/year) (E06 and E07)** | **38.00** | **38.00** | **0.46** | **1900.30** | **94.40** | ~~303.65~~ **571.24** |
| **2-Stroke Lean Burn Engine E06 (With LEC)** | | | | | | |
| | PM | PM10 | SO2 | NOx ** | VOC*** | CO*** |
| Emission Factor (lb/MMBtu) | 0.05 | 0.05 | 0.00 | | | |
| Emission Factor (g/bhp-hr) | | | | 5.30 | 0.30 | 1.47 |
| Potential Emission (tons/yr) | 19.00 | 19.00 | 0.23 | 614.14 | 34.53 | 170.34 |
| **2-Stroke Lean Burn Engine E07 (With LEC)** | | | | | | |
| | PM | PM10 | SO2 | NOx ** | VOC*** | CO*** |
| Emission Factor (lb/MMBtu) | 0.05 | 0.05 | 0.00 | | | |
| Emission Factor (g/bhp-hr) | | | | 5.30 | 0.25 | 1.44 |
| Potential Emission (tons/yr) | 19.00 | 19.00 | 0.23 | 614.14 | 29.08 | 166.86 |
| **PTE after LEC (tons/year) (E06 and E07)** | **38.00** | **38.00** | **0.46** | **1228.28** | **63.62** | **337.20** |
| **Net Difference due to Modification (tons/year)=[PTE After LEC (tons/year)– PTE Before LEC (tons/year)]** | **0.00** | **0.00** | **0.00** | **(672.1)** | **(30.78)** | **~~337.2~~ (234.04)** |

**Methodology**

Emission Factors (except $NO_X$ **and CO**) used for PTE before LEC are from AP 42 Tables 3.2-1, revised July 2000

* Emission Factor for $NO_X$ before LEC is from Year 1995 Ozone Season emission rate.

****** Emission Factor for CO before LEC is from Year 1994 stack test data.**

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

Emissions (tons/yr) = [Rated Horse Power (bhp) x Emission Factor (g/bhp-hr)] * 8760 hr/yr / (453.59 g/lb x 2,000 lb/ton )

**Emissions (tons/yr) = [ Emission Factor (lb/hr)] * 8760 hr/yr / (2,000 lb/ton )**

** NOx emission factor used for PTE after LEC is obtained from the LEC vendor guarantee (from g/bhp-hr).

*** VOC and CO emission factors used for PTE after LEC are obtained from April 2007 IDEM approved stack test data.

( ) - Values within bracket shows the amount by which the PTE (tons/year) is decreased due to the installation of LEC.

# Indiana Department of Environmental Management
# Office of Air Quality

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

## Source Description and Location

| | |
|---|---|
| Source Name: | ANR Pipeline Company – St. John Compressor Station |
| Source Location: | 10313 White Oak Avenue, St. John, IN 46373 |
| County: | Lake |
| SIC Code: | 4922 |
| Part 70 Operation Permit No.: | T089-6245-00069 |
| Part 70 Operation Permit Issuance Date: | November 12, 1998 |
| Minor Source Modification: | 089-25049-00069 |
| Significant Permit Modification: | 089-23456-00069 |
| Permit Writer: | Mehul Sura |

## Existing Approvals

The source was issued a Part 70 Operating Permit 089-6245-00069 on November 12, 1998. The source has since received the following approvals:

(a) Significant Source Modification No. 089-11347-00069 issued on January 19, 2000;
(b) Administrative Amendment No. 089-11359-00069 issued on January 21, 2000;
(c) First Permit Reopening 089-13357-00069 issued on December 31, 2001;
(d) Administrative Amendment No. 089-14589-00069 issued on April 5 , 2002;
(e) Minor Source Modification No. 089-20366-00069 issued on December 23, 2004;
(f) Administrative Amendment No. 089-19920-00069 issued on January 31, 2005;
(g) Significant Permit Modification No. 089-20476-00069 issued on July 1, 2005; and
(h) Administrative Amendment No. 089-21973-00069 issued on December 2, 2005.

The source has also submitted an application for a Part 70 Permit Renewal (No. 089-17532-00069) on April 4, 2003. Currently, this application is under review.

## County Attainment Status

The source is located in Lake County.

| County Status | |
|---|---|
| Pollutant | Status |
| PM10 | Unclassifiable/Attainment |
| PM2.5 | Nonattainment |
| $SO_2$ | Attainment |
| $NO_2$ | Unclassifiable/Attainment |
| 8-Hour Ozone | Nonattainment |
| CO | Maintenance Attainment |
| Lead | Unclassifiable/Attainment |

(a) On October 25, 2006, the permanent revision to 326 IAC 1-4-1 took effect redesignating Lake County to attainment for sulfur dioxide standard.

(b) 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) 1-hour ozone standard

(i) On January 26, 1996, the U.S. EPA in 40 CFR 52.777(i) granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower $NO_X$ threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Lake County has been designated as severe nonattainment in Indiana for the 1-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(ii) On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007).

The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe nonattainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

(2) 8-hour ozone standard

VOC and NOx emissions are considered when evaluating the rule applicability relating to 8-hour ozone standard. Lake County has been designated as nonattainment for 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(c) U.S. EPA, in the 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 Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the requirements of Nonattainment New Source Review (NSR), 326 IAC 2-1.1-5.

(d) Lake County has been classified as attainment or unclassifiable in Indiana for PM10, $SO_2$, $NO_2$, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(e) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

## Source Status

The table below summarizes the potential to emit (PTE) of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

| PTE of the Entire Source Prior to the Proposed Modification | |
|---|---|
| Pollutant | Emissions (tons/year) |
| PM | 53.83 |
| PM10 | 53.83 |
| $SO_2$ | 1.45 |
| VOC | 378.47 |
| CO | 1188.73 |
| $NO_x$ | 3653.54 |

(a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant, carbon monoxide (CO), is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

(b) This existing source is a major stationary source, under Emission Offset (326 IAC 2-3), because nonattainment regulated pollutants, volatile organic compound (VOC) and Nitrogen Oxide (NOx), are emitted at a rate of 100 tons per year or more.

(c) These emissions are based upon Minor Source Modification No. 089-20366-00069, issued on December 23, 2004 and are calculated as follows:

(PTE of the entire source prior to the proposed modification) = (PTE of the entire source prior to the Minor Source Modification No. 089-20366-00069) + (Increase in PTE due to the Minor Source Modification No. 089-20366-00069)

The Minor Source Modification No. 089-20366-00069 is taken as reference for calculating the PTE of the entire source (prior to the proposed modification) because it is the most recent source modification approval issued by IDEM.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

| HAPs PTE of the Entire Source Prior to the Proposed Modification | |
|---|---|
| HAPs | Potential To Emit (tons/year) |
| Single HAP | Greater than 10 |
| TOTAL HAPs | Greater than 25 |

This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

## Actual Emissions

The following table shows the actual emissions from the source. This information reflects the OAQ emission data for the year 2005.

| Actual Emissions of the Entire Source Prior to the Proposed Modification | |
|---|---|
| Pollutant | Actual Emissions (tons/year) |
| PM | NA* |
| PM10 | 21 |
| $SO_2$ | 0 |
| VOC | 52 |
| CO | 319 |
| $NO_x$ | 1002 |

* NA denotes data not available.

## Background and Description of Proposed Modification or New Source Construction

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by ANR Pipeline Company – St. John Compressor Station (herein after referred as ANR) on August 2, 2006, relating to the modification of the existing reciprocating internal combustion engines at the St. John Compressor Station located at 10313 White Oak Avenue in St. John, IN 46373. Additional information was received on September 8, 2006, November 16, 2006, December 20, 2006 and July 27, 2007. ANR will convert two (2) two-cycle lean burn natural gas fired reciprocating internal combustion engines, identified as Units E06 and E07, to low emission combustion (LEC) technology. ANR will incorporate a turbocharger to enhance mixing to eliminate air/fuel stratification and to reduce in-cylinder 'hot spots'. This modification also involves the incorporation of the NOx emission rate and the Compliance Plan into ANR's Title V Operating Permit, pursuant to 326 IAC 10-5 (Nitrogen Oxide Reduction Program for Internal Combustion Engines (ICE)).

The description of the modification to the emission units is as follows:

(a) Two (2) natural gas fueled reciprocating internal combustion engine compressors, installed in 1972 and 1973, identified as ID #s E06 and E07, equipped with Low Emission Combustion (LEC) technology, with a maximum capacity of 12000 Horsepower each, and exhausting to stacks # S06 and S07.

## Enforcement Issues

There are no pending enforcement actions related to this modification.

## Stack Summary

| Stack Summary of the Proposed Modification | | | | | |
|---|---|---|---|---|---|
| Stack ID | Operation | Height (feet) | Diameter (feet) | Flow Rate (acfm) | Temperature ($^0$F) |
| S06 | Reciprocating Internal Combustion Engine (E06) | 73.6 | 6.5 | 47525 | 800 |
| S07 | Reciprocating Internal Combustion Engine (E07) | 73.6 | 6.5 | 47525 | 800 |

## Emission Calculations

See Appendix A of this document for detailed emission calculations of the proposed modification.

## Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emission 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, IDEM, or the appropriate local air pollution control agency."

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Total Emission Increase by the Proposed Modification (Emission Units E06 & E07 only) | | | |
|---|---|---|---|
| Pollutant | PTE Before Modification (tons/year) [(a)] | PTE After Modification (tons/year) [(b)] | Net Difference (tons/year) [(c)] |
| PM | 38 | 38 | 0.0 |
| PM10 | 38 | 38 | 0.0 |
| $SO_2$ | 0.46 | 0.46 | 0.0 |
| VOC | 94.4 | 63.62 | 0.0[(d)] |
| CO | 303.65 | 337.2 | 33.55 |
| $NO_X$ | 1900.3 | 1228.3 | 0.0[(d)] |
| HAPs | 48.98 | 48.98 | 0.0 |

(a) PTE before modification with an assumption that each emission unit operates at 8760 hrs/year and without emission controls.
(b) PTE after modification with an assumption that each emission unit operates at 8760 hrs/year with installation of LEC for NOx controls.
(c) Net Difference = (b) – (a).
(d) Net difference values for NOx and VOC are negative numbers (see appendix A for details). These negative numbers are listed as zero (0) for permit level determination purpose.

The above table indicates that CO emissions are increased by 33.55 tons per year, due to the proposed modification. This value is less than 100 tons per year but greater than 25 tons year. Therefore, pursuant to 326 IAC 2-7-10.5(d)(3)(D), this modification is subject to the minor source modification requirements.

Additionally, operational requirements and the compliance plan pursuant to 326 IAC 10-5 (Nitrogen Oxide Reduction Program for Internal Combustion Engines) will be incorporated into the Part 70 Operating Permit through a significant permit modification because incorporating the Nitrogen Oxide Reduction

Program into the Part 70 Operating Permit involves significant changes to existing monitoring, reporting, or record keeping requirements in the Part 70 Operating Permit.

**Permit Level Determination – PSD or Emission Offset**

The table below summarizes the potential to emit, reflecting all limits, of the emission units (please refer to Appendix A of this document for detailed calculations). Any control equipment is considered federally enforceable only after issuance of this Part 70 Permit Modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

| Potential to Emit (tons/year) | | | | | | | |
|---|---|---|---|---|---|---|---|
| Process/Emission Unit | PM | PM10 | $SO_2$ | VOC | CO | $NO_X$ | Pb |
| E06 | 0 | 0 | 0.0 | (12.67) | 18.51 | (336.03) | -- |
| E07 | 0 | 0 | 0.0 | (18.11) | 15.03 | (336.03) | -- |
| Total for Modification | 0.0 | 0.0 | 0.0 | (30.78) | 33.54 | (672.06) | -- |
| Significant Levels | 25 | 15 | 40 | 40 | 100 | 40 | 0.6 |

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

Lake County has been designated as nonattainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled “Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas” authored by Steve Page, Director of OAQPS, until EPA promulgates the PM2.5 major NSR regulations, states should assume that a major stationary source’s PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A significant emissions increase for the source would be a net emissions increase or the potential of fifteen (15) tons per year or greater of PM10. ANR Pipeline Company – St. John Compressor Station has the potential to emit from the proposed modification below fifteen (15) tons per year of PM10. Therefore, assuming that PM10 emissions represent PM2.5 emissions, 326 IAC 2-1.1-5 does not apply for PM2.5.

## Federal Rule Applicability Determination

The following federal rules are applicable to the source due to the installation of LEC technology on internal combustion engines identified as E06 and E07:

(a) There are no new New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAPs) included due to the installation of LEC.

(b) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

(1) has a potential to emit before or after controls equal to or greater than the major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the applicability criteria, under 40 CFR 64.1, to each new or modified emission unit involved in the proposed project (modification):

| CAM Applicability | | | | | | | |
|---|---|---|---|---|---|---|---|
| Emission Unit | Control Device Used | Emission Limitation (Y/N) | Uncontrolled PTE (tons/year) | Controlled PTE (tons/year) | Major Source Threshold (tons/year) | CAM Applicable (Y/N) | Large Unit (Y/N) |
| E06 (NOx) | N | Y | 950.15 | 614.15 | 100 | N | - |
| E07 (NOx) | N | Y | 950.15 | 614.15 | 100 | N | - |

Emission units are being modified to install LEC to control NOx emissions and no other modifications are being done at the source. A control device as defined in 40 CFR 64.1, does not include passive control measures that act to prevent pollutants from forming, such as the use of seals, lids, or roofs to prevent the release of pollutants, use of low-polluting fuel or feedstocks, or the use of combustion or other process design features or characteristics. LEC proposed by ANR is a turbocharger to enhance mixing, to eliminate air/fuel stratification and to reduce in-cylinder ‘hot spots’, which can be considered as use of process design to prevent the formation of emissions. Further, according to AP-42, it is a parametric control or combustion control and not post-combustion control device. Hence, LEC cannot be considered as a control device. Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to the emission units E06 and E07 upon start-up of the LEC technology.

## State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

(a) 326 IAC 2-2 and 2-3 (PSD and Emission Offset)
PSD and Emission Offset applicability is discussed under the Permit Level Determination - PSD and Emission Offset section.

(b) 326 IAC 2-6 (Emission Reporting)
This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7, Part 70. In accordance with the compliance schedule in 326 IAC 2-6-3 (a)(1), an emission statement must be submitted annually by July 1. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

(c) 326 IAC 5-1 (Opacity Limitations)

The source is not located inside the area, bounded on the north by Lake Michigan, on the west by the Indiana-Illinois state line, on the south by U.S. 30 from the state line to the intersection of I-65 to the intersection of I-94 then following I-94 to the Lake-Porter county line, and on the east by the Lake-Porter county line.

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

(1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

(d) 326 IAC 6.8-1-1 (County Specific Particulate Matter Limitations)
This source is located in Lake County and has actual particulate emissions greater than 10 tons per year. Therefore, the requirements of 326 IAC 6.8-1 are applicable. This source is not specifically included in 326 IAC 6.8-2 through 326 IAC 6.8-11. Therefore, the facilities at this source are subject to the requirements of 326 IAC 6.8-1-2. Pursuant to 326 IAC 6.8-1-2(a), particulate emissions from the two (2) engines E06 and E07 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)). This emission limitation was incorporated into the Title V Operating Permit 089-6245-00069 and is being retained in this modification. However, the rule citation is being updated in the current modification to reflect the recent changes in Article 6 of 326 Indiana Administrative Code.

(e) 326 IAC 10-5 (Nitrogen Oxide Reduction Program for Internal Combustion Engine (ICE))
Pursuant to 326 IAC 10-5-1, this source is subject to the requirements of 326 IAC 10-5, because it is an owner of large NOx SIP Call Engines.

(1) 326 IAC 10-5-3(a), Compliance Plan Submittal Timelines
Pursuant to 326 IAC 10-5-3(a)(3), the compliance plan must be submitted to the Indiana Department of Environmental Management, OAQ by May 1, 2006. A compliance plan was submitted to OAQ on April 27, 2006.

(2) Pursuant to 326 IAC 10-5-3(a)(4), the complaince plan may include credit for decreases in NOx emissisons from large NOx SIP Call engines due to control equipment. ANR plans to install low emission combustion (LEC) to control NOx emissions. The NOx reductions due to LEC are shown in the Appendix supporting this TSD.

(3) Pursuant to 326 IAC 10-5-3(a)(5), the following information regarding each large NOx SIP call engine was included in the compliance plan:

| Large NOx SIP Call Engines at ANR Pipeline Company- St. John Compressor Station | | | | |
|---|---|---|---|---|
| Emission Unit ID | Operation | Manufacturer | Model | Facility Location and Address |
| E06 | Reciprocating Internal Combustion Engine | Dresser Clark | TCVC20M | 10313 White Oak Avenue, St. John IN 46373 |
| E07 | Reciprocating Internal Combustion Engine | Dresser Clark | TCVC20M | 10313 White Oak Avenue, St. John IN 46373 |

(4) Pursuant to 326 IAC 10-5-3(a)(5)(B), the source is required to submit projected ozone season hours of operation, in its compliance plan. ANR assumes continous operation during the ozone season which is equivalent to three thousand six hundred and seventy-

two (3,672) hours.

(5) Pursuant to 326 IAC 10-5-3(a)(5)(C), the source is required to submit a description of the NOx emission controls installed in its compliance plan. ANR Pipeline Company will convert two (2) two-cycle lean burn natural gas fired reciprocating internal combustion engines, identified as Units E06 and E07, to low emission combustion technology (LEC). The source will incorporate a turbocharger to enhance mixing to eliminate air/fuel stratification and to reduce in-cylinder 'hot spots'.

(6) Pursuant to 326 IAC 10-5-3(a)(5)(D) & (E), the source is required to submit the past and projected NOx emissions rates and seasonal NOx reduction. The emission rates and reductions from the compliance plan are summarized below:

| Ozone Season NOx Reductions from Emission Units E06 and E07 | | | | | | | |
|---|---|---|---|---|---|---|---|
| Unit ID | Ozone Season Operation (Hrs) | Rated Capacity (hp) | NOx [(a)] Emission Rate (g/bhp-hr) (1995) | NOx [(b)] Emissions (tons) (1995) | NOx [(c)] Emission Rate (g/bhp-hr) (2007) | NOx [(d)] Emissions (tons) (2007) | Reduction [(e)] in NOX emissions |
| E06 | 3672 | 12,000 | 8.2 | 398.3 | 5.3 | 257.43 | 135.78 |
| E07 | 3672 | 12,000 | 8.2 | 398.3 | 5.3 | 257.43 | 135.78 |
| **Total** | | | | 796.6 | | 514.86 | **281.74** |

(a) Emission rate of NOx estimated according to 1995 data in gram per brake horsepower-hour (g/bhp-hr).
(b) Total NOx emissions in 1995 Ozone season.This is obtained by multiplying the rated capacity of the engines with the 1995 emission rate.
(c) Year 2007 emission rate of NOx in gram per brake horsepower-hour (g/bhp-hr).
(d) Total NOx emissions in 2007 Ozone season.This is obtained by multiplying the rated capacity of the engines with the 2007 emission rate.
(e) Reduction in NOx emissions from the two large NOx SIP Call Engines for the Ozone season. This is obtained by substracting 2007 NOx emissions from 1995 NOx emissions.

(7) Pursuant to 326 IAC 10-5-3(b), this permit modification (089-23456-00069) will include a $NO_x$ limit of 5.3 per brake horsepower per hour (g/bhp-hr) each for emission units E06 and E07. This is equivalent to 140.21 pounds per hour (lb/hr) of $NO_X$ each for E06 and E07. In addition, 326 IAC 10-5-3(b) also requires a federally enforceable permit to contain monitoring and record keeping requirements that are required pursuant to 326 IAC 10-5. For compliance monitoring requirements, see the following section titled 'Compliance Determination and Monitoring Requirements'.

(8) Pursuant to 326 IAC 10-5-5, the Permittee shall maintain all records necessary to demonstrate compliance with the requirements of this rule. Each record shall be maintained for a period of two (2) calendar years at the plant at which the subject engine is located. The records shall be made available to the IDEM, OAQ and U.S. EPA upon request. The source shall submit results of all compliance tests to IDEM, OAQ and OES within forty-five (45) days after completion of the testing.

For Emission Units E06 and E07, ANR Pipe Line Company shall maintain the following records:

(a) Identification and location of each engine subject to the requirements of this rule.
(b) Calendar date of record.
(c) The number of hours the unit is operated during each ozone season compared to the projected operating hours.
(d) Type and quantity of fuel used.
(e) The results of all compliance tests.
(f) Monitoring data.
(g) Preventative maintenance.
(h) Corrective actions.

## Compliance Determination and Monitoring Requirements

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

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements. 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 compliance determination requirements applicable to this modification are as follows:

(a) Pursuant to 326 IAC 10-5-5, the Permittee shall maintain all records necessary to demonstrate compliance with the requirements of this rule. Each record shall be maintained for a period of two (2) calendar years at the plant at which the subject engine is located. The records shall be made available to the IDEM, OAQ, and U.S. EPA upon request. The source shall submit results of all compliance tests to IDEM, OAQ within forty-five (45) days after completion of the testing.

(b) For Emission Units E06 and E07, ANR Pipeline Company shall maintain the following records:

(a) Identification and location of each engine subject to the requirements of this rule.
(b) Calendar date of record.
(c) The number of hours the unit is operated during each ozone season compared to the projected operating hours.
(d) Type and quantity of fuel used.
(e) The results of all compliance tests.
(f) Monitoring data.
(g) Preventative maintenance.
(h) Corrective actions.

(c) Pursuant to 326 IAC 10-5-4, this permit revision requires the following compliance monitoring:

The Permittee shall perform annual performance tests on Emission Units E06 and E07 using portable monitors using ASTM D6522-00.

(d) Testing Requirements

(a) Pursuant to 326 IAC 10-5-4(1), within 180 days after the initial start up of Emission Units E06 and E07 with the LEC technology, in order to demonstrate compliance with the $NO_x$ limits of 5.3 grams per brake horsepower per hour (g/bhp-hr) for Emission Units E06 and E07, the Permittee shall perform an initial performance test for both Emission Units E06 and E07 consistent with the requirements of 40 CFR 60, Appendix A*. Testing shall be repeated every five (5) years. Testing shall be conducted in accordance with Section C-Performance Testing. This testing is required to demonstrate compliance with the NOx reduction attained by the modification.

(b) Pursuant to 326 IAC 10-5-4(2), the Permittee shall perform annual performance tests on Emission Units E06 and E07 using portable monitors using ASTM D6522-00 the $NO_x$ limits of 5.3 grams per brake horsepower per hour (g/bhp-hr) for Emission Units E06 and E07 (annual performance tests using portable monitors are not required for a given Emission Unit during calendar years when a performance test as required in the above paragraph (paragraph (a) of the Testing Requirements) is performed on that unit).

Alternatively, ANR can use a parametric monitoring program (as specified in 326 IAC 10-5-4(2)(B)) to periodically monitor the source's compliance with the projected $NO_X$ emission rate, after obtaining prior approval from IDEM for the parameter ranges.

## Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No.089-6245-00069. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**.

Change 1: IDEM, OAQ mailing addresses have been revised through out the permit to add mail codes as shown in the following table.

| OAQ Branch/Section | Revised Address |
|---|---|
| Technical Support and Modeling Section | Indiana Department of Environmental Management<br>Technical Support and Modeling Section, Office of Air Quality<br>100 North Senate Avenue<br>**MC 61-50 IGCN 1003**<br>Indianapolis, Indiana 46204-2251 |
| Compliance Branch | Indiana Department of Environmental Management<br>Compliance Branch, Office of Air Quality<br>100 North Senate Avenue<br>**MC 61-53 IGCN 1003**<br>Indianapolis, Indiana 46204-2251 |
| Air Compliance Section | Indiana Department of Environmental Management<br>Air Compliance Section, Office of Air Quality<br>100 North Senate Avenue<br>**MC 61-53 IGCN 1003**<br>Indianapolis, Indiana 46204-2251 |
| Compliance Data Section | Indiana Department of Environmental Management<br>Compliance Data Section, Office of Air Quality<br>100 North Senate Avenue<br>**MC 61-53 IGCN 1003**<br>Indianapolis, Indiana 46204-2251 |
| Permits Branch | Indiana Department of Environmental Management<br>Permits Branch, Office of Air Quality<br>100 North Senate Avenue<br>**MC 61-53 IGCN 1003**<br>Indianapolis, Indiana 46204-2251 |
| Asbestos Section | Indiana Department of Environmental Management<br>Asbestos Section, Office of Air Quality<br>100 North Senate Avenue<br>**MC 61-52 IGCN 1003**<br>Indianapolis, Indiana 46204-2251 |

Change 2: IDEM, OAQ phone numbers have been revised as follows:

Compliance Section Telephone**:** ~~317-233-5674~~ **317-233-0178**.
Compliance Section facsimile number: ~~317-233-5967~~ **317-233-6865**.

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Change 3: Due to the change in procedures at OAQ, the listing of Responsible Official (RO) has been removed from the permit. However, OAQ will maintain and update this information in its computer database.

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:~~ | ~~David F. Jones, Vice President – Eastern Operations~~ |
| Source Address: | 10313 White Oak Avenue, St. John, IN 46373 |
| Mailing Address: | 750 Old Hickory Blvd, Suite 190, Brentwood, TN 37027 |
| SIC Code: | 4922 |
| County Location: | Lake |
| County Status: | Severe Nonattainment for ozone under the 1-hour standard<br>~~Moderate~~ Nonattainment for ozone under the 8-hour standard<br>Nonattainment for PM2.5<br>Attainment for all other criteria pollutants |
| Source Status: | Part 70 Permit Program<br>Major Source under Emission Offset Rules **and PSD Rules**<br>Major Source, Section 112 of the Clean Air Act |

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Change 4: The description of the reciprocating engines (E01 through E04, E06, E07 and E09) in 'Table of Contents', Condition A.2, Section D.1 and Section D.2 has been revised for clarity purpose.

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D.1 FACILITY OPERATION CONDITIONS - Six (6) natural gas fueled reciprocating internal combustion ~~internal~~ engine**s** ~~compressors~~, one (1) emergency generator, and one (1) storage tank 24

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D.2 FACILITY OPERATION CONDITIONS – One (1) natural gas fueled reciprocating internal combustion ~~internal~~ engine ~~compressor~~.

. . .

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, equipped with Low Emission Combustion (LEC) technology, 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 **four stroke lean burn** reciprocating internal combustion ~~internal compressor~~ engine (RICE) ~~(4 stroke lean)~~**compressor**, 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.

**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, equipped with Low Emission Combustion (LEC) technology, with a maximum capacity of 12000 Horsepower each, and exhausting to stacks # S06 and S07.

. . .

**SECTION D.2 FACILITY OPERATION CONDITIONS**

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

(e) A natural gas fueled **four stroke lean burn** reciprocating internal combustion ~~internal compressor~~ engine (RICE) ~~(4 stroke lean)~~ **compressor**, 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.)

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Change 5: Condition B.22 has been revised to specify that any modification, construction, or reconstruction at the source will be governed by the requirements of 326 IAC 2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7-10.5 (Part 70 Permits Source Modifications). Since the source is considered as a 'major source' under 326 IAC 2-3 (Emission Offset), any modification at the source will also be governed by the requirements of 326 IAC 2-3.

~~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.22 Source Modification Requirement [326 IAC 2-7-10.5]**

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

**(b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2 and/or 326 IAC 2-3 (for sources located in NA areas).**

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Change 6: Condition D.1.1 has been deleted to reflect the changes that made for Condition B.22.

~~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).~~

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Change 7: 326 IAC 6-1 has been recodified in original Condition D.1.2 (now Condition D.1.1) because all Lake County PM limitations, formerly listed in 326 IAC 6-1, have been moved to 326 IAC 6.8 (and all non-Lake County PM limitations, formerly listed in 326 IAC 6-1, have been moved to 326 IAC 6.5). The new articles were published in September 1, 2005 Indiana Register and 326 IAC 6-1 have been repealed.

D.1.~~2~~**1** Particulate Matter Emission Limitation

Pursuant to ~~326 IAC 6-1-2 (Nonattainment Area Particulate Limitations: Specified)~~**326 IAC 6.8-1-2(a)**, facilities shall not discharge to the atmosphere gas streams which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (g/dscf).

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Change 8: Conditions in Section D.1 have been revised, due to the Installation of low emission combustion (LEC) technology and incorporation of compliance plan pursuant to 326 IAC 10-5, as follows:

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

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

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

**A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Emission Units E06 and E07.**

**Compliance Determination Requirements**

D.1.~~3~~**4** 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.1.5 Nitrogen Oxides (NOx) Emissions**

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

~~D.1.4~~**D.1.6** Testing Requirements [326 IAC 2-7-6(1),(6)] **[326 IAC 10-5-4]**

~~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.~~

**(a) Pursuant to 326 IAC 10-5-4(1), within 180 days after the initial start up of Emission Units E06 and E07 with the LEC technology, in order to demonstrate compliance with Condition D.1.2, the Permittee shall perform an initial performance test for NOx for both Emission Units E06 and E07, consistent with the requirements of 40 CFR 60, Appendix A*. Testing shall be repeated every five (5) years. Testing shall be conducted in accordance with Section C- Performance Testing.**

**(b) Pursuant to 326 IAC 10-5-4(2), the Permittee shall perform annual performance tests on Emission Units E06 and E07 using portable monitors using ASTM D6522-00 to show compliance with condition D.1.2 (annual performance tests using portable monitors are not required for a given Emission Unit during calendar years when a performance test required by subsection (a) of this Condition is performed on that unit). Alternatively, ANR can use a parametric monitoring program (as specified in 326 IAC 10-5-4(2)(B)) to periodically monitor the source's compliance with the projected $NO_X$ emission rate, after obtaining prior approval from IDEM for the parameter ranges.**

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

D.1.~~5~~**7** Record Keeping Requirements

(a) To document compliance with Conditions D.1.~~2~~ **1**, 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) Pursuant to 326 IAC 10-5-5(a), the Permittee shall maintain all records necessary to demonstrate compliance with the requirements of this rule. Each record shall be maintained for a period of two (2) calendar years at the plant at which the subject engine is located. The records shall be made available to the IDEM, OAQ and U.S. EPA upon request. The Permittee shall maintain the following records:**

**(1) Identification and location of each engine subject to the requirements of this rule.**
**(2) Calendar date of record.**
**(3) The number of hours the unit is operated during each ozone season compared to the projected operating hours.**
**(4) Type and quantity of fuel used.**
**(5) The results of all compliance tests.**
**(6) Monitoring data.**
**(7) Preventative maintenance.**
**(8) Corrective actions.**

**(e) Pursuant to 326 IAC 10-5-5(b), the Permittee shall submit results of all compliance tests to IDEM, OAQ within forty-five (45) days after completion of the testing.**

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

D.1.~~6~~**8** Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.~~3~~**4** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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Change 9: On April 25, 2002, Sierra Club filed a petition seeking judicial review of the EPA's final amendments of the general provisions of NESHAP (Sierra Club v. U.S. Environmental Protection Agency, No. 02-1135 (DC Circuit)). The Sierra Club also filed a petition seeking administrative reconsideration of certain provisions in the final amendments of the general provisions of NESHAP, pursuant to Clean Air Act (CAA) section 307(d)(7)(B). In response, U.S.EPA on April 20, 2006 removed the 40 CFR 63.6(E)(3)(II) and 63.6640 (c) requirements from the federal rule. Therefore, paragraph (a) of Condition D.2.3, which specifies 40 CFR 63.6(E)(3)(II) requirement and paragraph (d) of Condition D.2.10, which specifies 40 CFR 63.6640(c) requirement have been deleted.

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~~**a**) . . .

(~~c~~**b**) . . .

(~~d~~**c**) . . .

(~~e~~**d**) . . .

(~~f~~**e**) . . .

(~~g~~**f**) . . .

(~~h~~**g**) . . .

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

. . .

~~(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~~**d**) . . .

(~~f~~**e**) . . .

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Change 10: Mailing address of Responsible Official 'RO' has been revised as follows in Part 70 Operating Permit Certification, Emergency/Deviation Occurrence Report, Quarterly Deviation and Compliance Monitoring Report, and Quarterly Reporting Forms.

Mailing Address: ~~750 Old Hickory Blvd, Suite 190, Brentwood, TN 37027~~
**27725 Stansbury Blvd, Suite 200, Farmington Hills, MI 48334**

## Conclusion and Recommendation

The installation and operation of the low emission combustion (LEC) technology shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 089-25049-00069 and Significant permit Modification No. 089-23456-00069. The staff recommends to the Commissioner that this Part 70 Minor Source Modification and Significant Permit Modification be approved.

## IDEM Contact

Questions regarding this proposed permit can be directed to Mr. Mehul Sura at the Indiana Department of Environmental Management, Office of Air Quality, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, IN 46204-2251, or by telephone at (317) 233-1782 or toll free at 1-800-451-6027 extension 3-1782.

| | | | | | | |
|---|---|---|---|---|---|---|
| | **Appendix A: Emission Calculations** | | | **Page 1 of 2 TSD App A** | | |
| | **Natural Gas-fired Reciprocating Engines** | | | | | |
| | | | | | | |
| | **Company Name:** | **ANR Pipeline - St. John Compressor Station** | | | | |
| | **Address City IN Zip:** | **10313 White Oak Avenue, St. John, IN 46373** | | | | |
| | **Source Modification No:** | **089-25049-00069** | | | | |
| | **Permit Modification No:** | **089-23456-00069** | | | | |
| | **Plt ID:** | **089-00069** | | | | |
| | **Reviewer:** | **Mehul Sura** | | | | |
| | **Date:** | **6/15/2007** | | | | |
| | | | | | | |
| **Emission Unit E06** | | | | | | |
| Heat Input Capacity (MMBtu/Hr) | Rated Horsepower (bhp) | | | | | |
| 89.80 | 12000.00 | | | | | |
| | | | | | | |
| **Emission Unit E07** | | | | | | |
| Heat Input Capacity (MMBtu/Hr) | Rated Horsepower (bhp) | | | | | |
| 89.80 | 12000.00 | | | | | |
| | | | | | | |
| **2-Stroke Lean Burn Engines E06 and E07 (Without LEC)** | | | | | | |
| | PM | PM10 | SO2 | $NO_X$ * | VOC | CO |
| Emission Factor (lb/MMBtu) | 0.05 | 0.05 | 0.00 | | 0.12 | 0.39 |
| Emission Factor (g/bhp-hr) | | | | 8.20 | | |
| Potential Emission (tons/yr) | 38.00 | 38.00 | 0.46 | 1900.30 | 94.40 | 303.65 |
| | | | | | | |
| **PTE before LEC (tons/year) (E06 and E07)** | **38.00** | **38.00** | **0.46** | **1900.30** | **94.40** | **303.65** |
| | | | | | | |
| **2-Stroke Lean Burn Engine E06 (With LEC)** | | | | | | |
| | PM | PM10 | SO2 | NOx ** | VOC*** | CO*** |
| Emission Factor (lb/MMBtu) | 0.05 | 0.05 | 0.00 | | | |
| Emission Factor (g/bhp-hr) | | | | 5.30 | 0.30 | 1.47 |
| Potential Emission (tons/yr) | 19.00 | 19.00 | 0.23 | 614.14 | 34.53 | 170.34 |
| | | | | | | |
| **2-Stroke Lean Burn Engine E07 (With LEC)** | | | | | | |
| | PM | PM10 | SO2 | NOx ** | VOC*** | CO*** |
| Emission Factor (lb/MMBtu) | 0.05 | 0.05 | 0.00 | | | |
| Emission Factor (g/bhp-hr) | | | | 5.30 | 0.25 | 1.44 |
| Potential Emission (tons/yr) | 19.00 | 19.00 | 0.23 | 614.14 | 29.08 | 166.86 |
| | | | | | | |
| **PTE after LEC (tons/year) (E06 and E07)** | **38.00** | **38.00** | **0.46** | **1228.28** | **63.62** | **337.20** |
| | | | | | | |
| **Net Difference due to Modification (tons/year)=[PTE After LEC (tons/year)– PTE Before LEC (tons/year)]** | **0.00** | **0.00** | **0.00** | **(672.1)** | **(30.78)** | **33.55** |
| | | | | | | |
| **Methodology** | | | | | | |
| Emission Factors (except $NO_X$) used for PTE before LEC are from AP 42 Tables 3.2-1, revised July 2000 | | | | | | |
| * Emission Factor for $NO_X$ before LEC is from Year 1995 Ozone Season emission rate. | | | | | | |
| Emissions (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton ) | | | | | | |
| Emissions (tons/yr) = [Rated Horse Power (bhp) x Emission Factor (g/bhp-hr)] * 8760 hr/yr / (453.59 g/lb x 2,000 lb/ton ) | | | | | | |
| ** NOx emission factor used for PTE after LEC is obtained from the LEC vendor guarantee (from g/bhp-hr). | | | | | | |
| *** VOC and CO emission factors used for PTE after LEC are obtained from April 2007 IDEM approved stack test data. | | | | | | |
| ( ) - Values within bracket shows the amount by which the PTE (tons/year) is decreased due to the installation of LEC. | | | | | | |

| | | | |
|---|---|---|---|
| | **Appendix A: Emission Calculations** | | |
| | **Natural Gas-fired Reciprocating Engines** | | |
| | **Company Name:** | **ANR Pipeline - St. John Compressor Station** | |
| | **Address City IN Zip:** | **10313 White Oak Avenue, St. John, IN 46373** | |
| | **Source Modification No:** | **089-25049-00069** | |
| | **Permit Modification No:** | **089-23456-00069** | |
| | **Plt ID:** | **089-00069** | |
| | **Reviewer:** | **Mehul Sura** | |
| | **Date:** | **6/15/2007** | |

**Emission Units E06 and E07**

| Heat Input Capacity (MMBtu/Hr) | Rated Horsepower |
|---|---|
| 179.800 | 24000.000 |

| **HAP** | **Emission Factor Two stroke lean burn (lb/MMBtu)** | **Potential to Emit (Before LEC) (tons/yr)** | **Potential to Emit (After LEC) (tons/yr)** |
|---|---|---|---|
| 1,1,2,2-Tetrachloroethane | 6.63E-05 | 0.052 | 0.052 |
| 1,1,2-Trichloroethane | 5.27E-05 | 0.042 | 0.042 |
| 1,3-Butadiene | 8.20E-04 | 0.646 | 0.646 |
| 1,3-Dichloropropene | 4.38E-05 | 0.034 | 0.034 |
| 2,2,4-Trimethylpentane | 8.46E-04 | 0.666 | 0.666 |
| Acetaldehyde | 7.76E-03 | 6.111 | 6.111 |
| Acrolein | 7.78E-03 | 6.127 | 6.127 |
| Benzene | 1.94E-03 | 1.528 | 1.528 |
| Biphenyl | 3.95E-06 | 0.003 | 0.003 |
| Carbon Tetrachloride | 6.07E-05 | 0.048 | 0.048 |
| Chlorobenzene | 4.44E-05 | 0.035 | 0.035 |
| Chloroethane | 0.00E+00 | 0.000 | 0.000 |
| Chloroform | 4.71E-05 | 0.037 | 0.037 |
| Ethylbenzene | 1.08E-04 | 0.085 | 0.085 |
| Ethylene Dibromide | 7.34E-05 | 0.058 | 0.058 |
| Formaldehyde | 5.52E-02 | 43.471 | 43.471 |
| Methanol | 2.48E-03 | 1.953 | 1.953 |
| Methylene Chloride | 1.47E-04 | 0.116 | 0.116 |
| n-Hexane | 4.45E-04 | 0.350 | 0.350 |
| Naphthalene | 9.63E-05 | 0.076 | 0.076 |
| Phenol | 4.21E-05 | 0.033 | 0.033 |
| Styrene | 5.48E-05 | 0.043 | 0.043 |
| Toluene | 9.63E-04 | 0.758 | 0.758 |
| Vinyl Chloride | 2.47E-05 | 0.019 | 0.019 |
| Xylene | 2.68E-04 | 0.211 | 0.211 |
| **Total HAPs** | **7.94E-02** | **62.504** | **62.504** |

**Methodology**

Emission Factors used for PTE before LEC are from AP 42 Tables 3.2-1, revised July 2000

HAPs emissions have not changed significantly due to installation LEC technology on the engines.

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