



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: March 31, 2008

RE: Citizens Gas & Coke Utility-Johnstown Compressor Station / 055-23656-00029

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot12/03/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

Citizens Gas & Coke Utility - Johnstown Compressor Station State Road 157, 4.5 miles North of Worthington Johnstown, Indiana 47471

(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. 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 2-8 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.

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 FESOP under 326 IAC 2-8.

Operation Permit No.: F055-23656-00029	
Issued by/Original Signed By: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 31, 2008 Expiration Date: March 31, 2018

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
SECTION B	GENERAL CONDITIONS	7
B.1	Definitions [326 IAC 2-8-1]	
B.2	Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Severability [326 IAC 2-8-4(4)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.9	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11	Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.12	Emergency Provisions [326 IAC 2-8-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]	
B.14	Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5) (C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]	
B.17	Permit Renewal [326 IAC 2-8-3(h)]	
B.18	Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]	
B.19	Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.20	Source Modification Requirement [326 IAC 2-8-11.1]	
B.21	Inspection and Entry [326 IAC 2-8-5(a) (2)] [IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]	
B.24	Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS	16
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8] [326 IAC 2-2]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]	
	Testing Requirements [326 IAC 2-8-4(3)]	
C.8	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.9	Compliance Requirements [326 IAC 2-1.1-11]	

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.11 Monitoring Methods [326 IAC 3] [40 CFR 60][40 CFR 63]
- C.12 Instrument Specifications
[326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.14 Response to Excursions and Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test
[326 IAC 2-8-4][326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

- C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS: Natural Gas-Fired Engines23

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.1 Fuel Usage Limit (NO_x) [326 IAC 2-8-4]
- D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.3 Record Keeping Requirements
- D.1.4 Reporting Requirements

Certification Form.....	24
Emergency Occurrence Form.....	25
FESOP Quarterly Report.....	27
Quarterly Deviation and Compliance Monitoring Report Form.....	28

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 2-8-3(b)]

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

Source Address:	State Road 157, 4.5 miles North of Worthington, Johnstown, Indiana 47471
Mailing Address:	RR 2, Box 180, Worthington, Indiana 47471
General Source Phone Number:	812-875-2066
SIC Code:	4922
County Location:	Greene
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) natural gas-fired Ajax two (2) cycle rich burn, reciprocating engine compressor, identified as Ajax01, rated at 230 horsepower output and 2,070,000 British thermal units per hour heat input, using no control device, installed in 1961, exhausting to Stack J01.
- (b) Two (2) natural gas-fired Worthington four (4) cycle rich burn, reciprocating engine compressors, identified as Worth02 and Worth03, rated at 550 horsepower output each and 4,950,000 British thermal units per hour heat input each, using no control device, both installed in 1961, exhausting to Stacks J02 and J03.
- (c) Two (2) natural gas-fired Ingersoll-Rand four (4) cycle rich burn, reciprocating engine compressors, identified as InRand04 and InRand05, rated at 500 horsepower output each and 4,500,000 British thermal units per hour heat input each, using no control device, installed in 1963 and 1969, respectively, exhausting to Stacks J04 and J05.

A.3 Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour with a total rating of 2.041 million British thermal units per hour consisting of: [326 IAC 6-2-4]
 - (1) One (1) boiler, rated at 1.092 million British thermal units per hour, installed in 2001, located in the Mechanic Shop and Compressor House.
 - (2) One (1) furnace, rated at 0.050 million British thermal units per hour, installed in 2001, located in the garage.

- (3) One (1) furnace, rated at 0.050 million British thermal units per hour, installed in 2001, located in the pipe tech office.
 - (4) One (1) hanging heater, rated at 0.075 million British thermal units per hour, installed in 1990, located in the fire truck building.
 - (5) One (1) heater, rated at 0.050 million British thermal units per hour, installed in 1995, located in storage building NE.
 - (6) Two (2) hanging heaters, rated at 0.075 million British thermal units per hour each, installed in 1994, located in the storage room.
 - (7) One (1) furnace, rated at 0.080 million British thermal units per hour, installed in 1994.
 - (8) One (1) water heater, rated at 0.033 million British thermal units per hour, installed in 1994, located in the store room office.
 - (9) Two (2) water heaters, rated at 0.032 million British thermal units per hour each, installed in 1987 and 1993.
 - (10) One (1) furnace rated at 0.150 million British thermal units per hour, installed in 1993, located in the new office.
 - (11) One (1) furnace, rated at 0.150 million British thermal units per hour, installed in 1993, located in the meeting room.
 - (12) One (1) gas control furnace, rated at 0.067 million British thermal units per hour, installed in 1987.
 - (13) One (1) heater, rated at 0.030 million British thermal units per hour, installed in 1990, located in the document storage building.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles and having a storage capacity less than or equal to 10,500 gallons.
 - (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
 - (d) Closed loop heating and cooling systems.
 - (e) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
 - (f) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
 - (g) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
 - (h) Emergency generators as follows: Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower, consisting of one (1) natural gas fired reciprocating engine rated at 195 horsepower output.
 - (l) One (1) 1,400 gallon glycol storage tank constructed in 1961.

- (j) Two (2) 1,000 gallon amine storage tanks, one constructed in 1965 and the second in 1977.
- (k) One (1) process vessel for degassing and cleaning to prepare for internal repairs.
- (l) Equipment used to collect any material that might be released during a malfunction process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F055-23656-00029, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an “authorized individual” of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An “authorized individual” is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

- (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 2-8-12.
- (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 describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,
Telephone No.: 317-233-0178 (ask for Compliance Section)
Facsimile No.: 317-233-6865
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 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 material of substantial economic value.

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

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) All terms and conditions of permits established prior to F055-23656-00029 and issued pursuant to permitting programs approved into the state implementation plan have been either
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application should be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 2-8-11.1 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- and
- United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
- in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emissions trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) 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.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.
[326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) 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.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit NO_x and CO, from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period, each. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity

monitor) in a six (6) hour period.

C.4 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.

C.5 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 in 326 IAC 9-1-2.

C.6 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).

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project

supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Testing Requirements [326 IAC 2-8-4(3)]

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 any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

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

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

The notification which shall be submitted by the Permittee does require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

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

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

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

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" mean the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-8-4(10)]: Natural Gas-Fired Engine Compressors

- (a) One (1) natural gas-fired Ajax two (2) cycle rich burn, reciprocating engine compressor, identified as Ajax01, rated at 230 horsepower output and 2,070,000 British thermal units per hour heat input, using no control device, installed in 1961, exhausting to Stack J01.
- (b) Two (2) natural gas-fired Worthington four (4) cycle rich burn, reciprocating engine compressors, identified as Worth02 and Worth03, rated at 550 horsepower output each and 4,950,000 British thermal units per hour heat input each, using no control device, both installed in 1961, exhausting to Stacks J02 and J03.
- (c) Two (2) natural gas-fired Ingersoll-Rand four (4) cycle rich burn, reciprocating engine compressors, identified as InRand04 and InRand05, rated at 500 horsepower output each and 4,500,000 British thermal units per hour heat input each, using no control device, installed in 1963 and 1969, respectively, exhausting to Stacks J04 and J05.

(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 2-8-4(1)]

D.1.1 Fuel Usage Limit (NO_x) [326 IAC 2-8-4]

The amount of fuel delivered to the five (5) natural gas-fired compressors shall be less than a total of 48.6 million cubic feet per twelve (12) consecutive month period.

For purposes of determining compliance based on NO_x emissions, the emissions shall not exceed 2,506 pounds of NO_x per million cubic foot of natural gas and the CO emissions shall not exceed 3,906 pounds of CO per million cubic foot of natural gas. Compliance with this limit will limit the potential to emit NO_x and CO to less than one hundred (100) tons per 12 month consecutive period with compliance to be determined at the end of each month and shall make the requirements of 326 IAC 2-7, not applicable.

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.3 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the monthly fuel usage for the five (5) engine compressors. Records maintained monthly shall be complete and sufficient to establish compliance with the natural gas fuel usage limit and the NO_x and CO emission limit established in Condition D.1.1.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Citizens Gas & Coke Utility - Johnstown Compressor Station
Source Address: State Road 157, 4.5 miles North of Worthington, Johnstown, Indiana 47471
Mailing Address: RR 2, Box 180, Worthington, Indiana 47471
FESOP No.: F055-23656-00029

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Citizens Gas & Coke Utility - Johnstown Compressor Station
Source Address: State Road 157, 4.5 miles North of Worthington, Johnstown, Indiana 47471
Mailing Address: RR 2, Box 180, Worthington, Indiana 47471
FESOP No.: F055-23656-00029

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
☐ The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
☐ 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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Citizens Gas & Coke Utility - Johnstown Compressor Station
 Source Address: State Road 157, 4.5 miles North of Worthington, Johnstown, Indiana 47471
 Mailing Address: RR 2, Box 180, Worthington, Indiana 47471
 FESOP No.: F055-23656-00029
 Facilities: Five (5) Engine Compressors, Unit ID: Ajax01, Worth02, Worth03, InRand04 and InRand05
 Parameter: Fuel Usage
 Limit: Less than a total of 48.6 million cubic feet of natural gas per twelve (12) consecutive month period.

YEAR: _____

Month	Natural Gas Fuel Usage (cubic feet)	Natural Gas Fuel Usage (cubic feet)	Natural Gas Fuel Usage (cubic feet)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Citizens Gas & Coke Utility - Johnstown Compressor Station
Source Address: State Road 157, 4.5 miles North of Worthington, Johnstown, Indiana 47471
Mailing Address: RR 2, Box 180, Worthington, Indiana 47471
FESOP No.: F055-23656-00029

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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:	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Addendum to the Technical Support Document (ATSD) for a
FESOP Renewal

Source Background and Description
--

Source Name:	Citizens Gas & Coke Utility - Johnstown Compressor Station
Source Location:	State Road 157, 4.5 miles North of Worthington, Johnstown, Indiana 47471
County:	Greene
SIC Code:	4922
Operation Permit No.:	F055-14432-00029
Issuance Date:	July 22, 2002
Permit Renewal No.:	F055-23656-00029
Permit Reviewer:	Janet Mobley

On February 19, 2008, the Office of Air Quality (OAQ) had a notice published in the Linton Daily Citizen, Linton, Indiana, stating that Citizens Gas & Coke Utility - Johnstown Compressor Station had applied for a FESOP Renewal to continue to operate their stationary natural gas compressor station operation. The notice also stated that the OAQ proposed to issue a FESOP Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On March 20, 2008, Ann McIver, Manager of Environmental Affairs at Citizens Gas & Coke Utility, submitted comments to IDEM, OAQ on the draft FESOP Renewal.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1: The commentor requested that Condition D.2 be deleted. The insignificant activities listed are small units and significantly below the referenced particulate limit without controls or restrictions

Response to Comment 1: IDEM agrees with the recommended change. IDEM has deleted the D.2 Section of the permit and revised the Table of Contents to reflect the changes. The permit has been revised as follows:

SECTION D.2 — EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) ~~Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including, but not limited to: one (1) boiler rated at 1.092 million British thermal units per hour, installed in 2001, located in the Mechanic Shop and Compressor House; one (1) water heater, rated at 0.033 million British thermal units per hour, installed in 1994, located in the store room office; and, two (2) water heaters, rated at 0.032 million British thermal units per hour installed in 1987 and 1993. [326 IAC 6-2-4]~~

~~(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 2-8-4(1)]

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

~~Pursuant to 326 IAC 6-2-4(a), for indirect heating units constructed after September 1, 1983 and having a total source heat input capacity less than 10 million British thermal units per hour, the PM emission shall not exceed 0.6 pounds per million British thermal unit. Therefore, the PM from the boiler and water heaters is limited to 0.6 pound per million British thermal units.~~

Comment 2: The commentor requested that Appendix A calculations be reviewed to ensure that they are consistent and clarified so that it can be understood how the FESOP limits were determined.

Response to Comment 2: The calculations have been reviewed and found to be consistent, no changes were made.

As a clarification, the fuel usage limits are changed from the previous permit because during the review process for this renewal it was determined that CO was the limiting factor not NOx so the limits had to be revised.

IDEM Contact

Questions regarding this proposed FESOP Renewal can be directed to Janet Mobley at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5373 or toll free at 1-800-451-6027 extension 4-5373.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD)
for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	Citizens Gas & Coke Utility - Johnstown Compressor Station
Source Location:	State Road 157, 4.5 miles North of Worthington, Johnstown, Indiana 47471
County:	Greene
SIC Code:	4922
Operation Permit No.:	F055-14432-00029
Issuance Date:	July 22, 2002
Permit Renewal No.:	F055-23656-00029
Permit Reviewer:	Janet Mobley

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Citizens Gas & Coke Utility - Johnstown Compressor Station for the operation of a stationary natural gas compressor station.

History

On September 15, 2006, Citizens Gas & Coke Utility – Johnstown Compressor Station submitted an application to the OAQ requesting to renew its operating permit. Citizens Gas & Coke Utility – Johnstown Compressor Station was issued a FESOP renewal permit no. F055-14432-00029 on July 22, 2002.

Permitted Emission Units and Pollution Control Equipment

The operation includes the following emission units and pollution control devices:

- (a) One (1) natural gas-fired Ajax two (2) cycle rich burn, reciprocating engine compressor, identified as Ajax01, rated at 230 horsepower output and 2.07 million British thermal units per hour heat input, using no control device, installed in 1961, and exhausting to Stack J01.
- (b) Two (2) natural gas-fired Worthington four (4) cycle rich burn, reciprocating engine compressors, identified as Worth02 and Worth03, rated at 550 horsepower output each and 4.95 million British thermal units per hour heat input each, using no control device, both installed in 1961, exhausting to Stacks J02 and J03.
- (c) Two (2) natural gas-fired Ingersoll-Rand four (4) cycle rich burn, reciprocating engine compressors, identified as InRand04 and InRand05, rated at 500 horsepower output each and 4.5 million British thermal units per hour heat input each, using no control device, installed in 1963 and 1969, respectively, exhausting to Stacks J04 and J05.

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour with a total rating of 2.041 million British thermal units per hour consisting of: [326 IAC 6-2-4]

- (1) One (1) boiler, rated at 1.092 million British thermal units per hour, installed in 2001, located in the Mechanic Shop and Compressor House.
 - (2) One (1) furnace, rated at 0.050 million British thermal units per hour, installed in 2001, located in the garage.
 - (3) One (1) furnace, rated at 0.050 million British thermal units per hour, installed in 2001, located in the pipe tech office.
 - (4) One (1) hanging heater, rated at 0.075 million British thermal units per hour, installed in 1990, located in the fire truck building.
 - (5) One (1) heater, rated at 0.050 million British thermal units per hour, installed in 1995, located in storage building NE.
 - (6) Two (2) hanging heaters, rated at 0.075 million British thermal units per hour each, installed in 1994, located in the storage room.
 - (7) One (1) furnace, rated at 0.080 million British thermal units per hour, installed in 1994.
 - (8) One (1) water heater, rated at 0.033 million British thermal units per hour, installed in 1994, located in the store room office.
 - (9) Two (2) water heaters, rated at 0.032 million British thermal units per hour each, installed in 1987 and 1993.
 - (10) One (1) furnace rated at 0.150 million British thermal units per hour, installed in 1993, located in the new office.
 - (11) One (1) furnace, rated at 0.150 million British thermal units per hour, installed in 1993, located in the meeting room.
 - (12) One (1) gas control furnace, rated at 0.067 million British thermal units per hour, installed in 1987.
 - (13) One (1) heater, rated at 0.030 million British thermal units per hour, installed in 1990, located in the document storage building.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles and having a storage capacity less than or equal to 10,500 gallons.
 - (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
 - (d) Closed loop heating and cooling systems.
 - (e) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
 - (f) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

- (g) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (h) Emergency generators as follows: Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower, consisting of one (1) natural gas fired reciprocating engine rated at 195 horsepower output.
- (i) One (1) 1,400 gallon glycol storage tank constructed in 1961.
- (j) Two (2) 1,000 gallon amine storage tanks, one constructed in 1965 and the second in 1977.
- (k) One (1) process vessel for degassing and cleaning to prepare for internal repairs.
- (l) Equipment used to collect any material that might be released during a malfunction process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (m) Other activity or category not previously identified:

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of the following units:

One (1) natural gas-fired boiler used for space heating

Two (2) natural gas-fired water heaters.

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

During the review process the source submitted information regarding the above mentioned three activities that include a natural gas-fired boiler used for space heating, and two natural gas-fired water heaters that had not been previously identified in the previous FESOP or the renewal application.

Existing Approvals

There have not been any other approvals issued to the source since the last FESOP renewal (F055-14432-00029) issued on July 22, 2002.

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

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
J01	Ajax01	18	12	266.7	Not reported
J02	Worth02	28.3	10	1100	Not reported
J03	Worth03	28.3	10	1100	Not reported

J04	InRand04	25.25	8	966.7	Not reported
J05	InRand05	25.25	8	966.7	Not reported

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 7).

County Attainment Status

The source is located in Greene County.

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

- (a) Greene County has been classified as unclassifiable or attainment for PM 2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM 2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM 2.5 emissions.
- (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. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Greene County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Greene County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard.
- (e) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (f) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were

in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	10.0
PM ₁₀	10.1
SO ₂	<0.01
VOC	5.95
CO	180
NO _x	229

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	tons/yr
Benzene	0.025
Dichlorobenzene	0.000007
Formaldehyde	0.003
Hexane	0.009
Toluene	0.095
Lead	0.00003
Cadmium	0.000006
Chromium	0.000008
Manganese	0.000002
Nickel	0.000001
Total	0.132044

See Appendix A Pages 3, 5, and 7 of 9 for a detailed breakdown of HAPs.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of NO_x and CO are equal to or greater than one hundred (100) tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their NO_x and CO emissions to less than Title V levels, therefore the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (d) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1999 (latest available) OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM-10	0
SO₂	0
VOC	1
CO	25
NO_x	32
Single HAP	Not reported

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
5 Engine Compressors Ajax01, Worth02, Worth03, Rand04 & Rand05	0.00	0.00	0.000	3.808	95.0	60.9	0.312
Natural Gas Combustion Insignificant Activities	0.017	0.068	0.007	0.049	0.751	0.894	0.017
Natural Gas Emergency Generator Insignificant Activities	0.003	0.013	0.0002	0.041	1.27	1.39	0.028
Potential Emission Totals			0.0081	3.95	<100	<100	2.00
Other Insignificant Activities *	10.0	10.0	--	2.00			Single < 1 Total < 2
Total Emissions	10.0	10.1	0.0081	5.95	< 100	< 100	Single < 10 Total < 25

* "unaccounted" emissions that could potentially exist with insignificant activities

" - " emissions are negligible (less than 0.1 tons per year).

The source has accepted a total fuel usage limit of less than 48.6 million cubic feet of natural gas per twelve (12) consecutive month period. Compliance with this limit will result in emissions less than 60.9 tons of NO_x and less than 95.0 tons of CO per year for the five (5) engine compressors. For purposes of determining compliance based on NO_x emissions, the emissions shall not exceed 2,506 pounds of NO_x per million cubic foot of natural gas per month and the CO emissions shall not exceed 3,906 pounds of CO per million cubic foot of natural gas per month. This limit in combination with all of the emission units located at the source will overall limit NO_x and CO to less than 100 tons per year.

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) 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 applicability.

Federal Rule Applicability

- (a) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not included in this permit. This source is operating as a FESOP. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (c) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels), (40 CFR Part 60.110, Subpart Kb) (326 IAC 12) are not included in this permit for the one (1) 1400 gallon glycol and two (2) gallon amine storage tanks because these tanks have a storage capacity less than 75 cubic meters (m³) (19,813 gallons).
- (d) The requirements of the New Source Performance Standard for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 (40 CFR 60, Subpart K) (326 IAC 12) are not included in this permit for the amine storage tanks because these tanks do not store a petroleum liquid.
- (e) The requirements of the New Source Performance Standards for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, (40 CFR 60, Subpart Ka), are not included in this permit because the amine storage tanks have a storage capacity less than 40,000 gallons and do not store petroleum liquid.
- (f) The requirements of the New Source Performance Standard for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants, (326 IAC 12 and 40 CFR Part 60) Subpart KKK because 40 CFR 60.630(e) exempts compressor stations not located at a natural gas processing plant as defined by 40 CFR 60.631. The emission units; one (1) Ajax two cycle lean burn, the two (2) Worthington four cycle and the two (2) Ingersoll-Rand natural gas fired reciprocating internal combustion compressor engines are not subject to the requirements of this rule. A natural gas processing plant means any processing site

engaged in the extraction of natural gas liquids from field gas (feedstock gas) or fractionation of mixed natural gas liquids to natural gas products. This operation is not a natural gas processing plant, therefore it is not subject to NSPS, Subpart KKK.

- (g) The requirements of the New Source Performance Standard for Onshore Natural Gas Processing: SO₂ Emissions (40 CFR 60, Subpart LLL, 326 IAC 12) are not included in this permit for the emission units at this source because the source was constructed before January 20, 1984 and has not been "modified" since that time, as that term is defined in 40 CFR 60.2.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD are not included in this permit for the natural gas-fired boilers. This source is a minor source of hazardous air pollutants (HAPs).
- (i) The one (1) Ajax two cycle lean burn, the two (2) Worthington four cycle and the two (2) Ingersoll-Rand natural gas fired reciprocating internal combustion compressor engines are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.330 Subpart GG), Standards of Performance for Stationary Gas Turbines, because they are not gas turbine engines.
- (j) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR Part 63) included in this permit renewal.
- (k) This natural gas compressor station operation is not subject to the National Emission Standards for Hazardous Air Pollutant, 326 IAC 20, (40 CFR 63.6580, Subpart ZZZZ- National Emission Standards for Stationary Reciprocating Internal Combustion Engines, because the potential uncontrolled HAP emissions from the source do not exceed major source thresholds. Therefore, the source is not considered a major source of HAPs.

State Rule Applicability - Entire Source

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

The source was constructed prior to the PSD applicability date of August 7, 1977, and is still a minor existing PSD source. This source is not one of the twenty-eight (28) listed source categories. Although the uncontrolled potential to emit (PTE) of NO_x and CO is in excess of 100 tons per year, the source has agreed to limit its NO_x and CO emissions to less than one hundred (100) tons per 12 month consecutive period, with compliance to be determined at the end of each month.

For purposes of determining compliance based on NO_x emissions, the emissions shall not exceed 2,506 pounds of NO_x per million cubic foot of natural gas and the CO emissions shall not exceed 3,906 pounds of CO per million cubic foot of natural gas. These limits shall limit the potential to emit NO_x and CO to less than one hundred (100) tons per 12 month consecutive period with compliance to be determined at the end of each month and shall make the requirements of 326 IAC 2-7, not applicable.

326 IAC 2-3 (Emission Offset)

This source has opted to continue to operate under 326 IAC 2-8 (FESOP) rules. The source-wide potential VOC and CO emissions will each be limited to less than one hundred (100) tons per 12 month consecutive period with compliance to be determined at the end of the month as part of this FESOP Renewal. Therefore, this source is considered a minor source under 326 IAC 2-3

(Emission Offset).

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

The source has not constructed or reconstructed a major source of hazardous air pollutants (HAPs), as defined in 40 CFR 63.4, after July 27, 1997. Therefore the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 1-5-2 (Emergency Reduction Plans)

The potential to emit is greater than 100 tons of NO_x and the source agreed to limit NO_x to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements do not apply to this source.

326 IAC 2-6 (Emission Reporting)

This source is located in Greene County and the potential to emit NO_x and CO is greater than one hundred (100) tons per year but the source has agreed to limit these to less than 100 tons per 12 consecutive month period. Therefore, 326 IAC 2-6 does not apply to this source.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the source has agreed to limit the fuel usage to less than 48.6 million cubic feet of natural gas per twelve (12) month consecutive period. As a result, the source wide emissions of CO and NO_x shall be limited to less than one hundred (100) tons per year. For purposes of determining compliance based on NO_x emissions, the emissions shall not exceed 2,506 pounds of NO_x per million cubic foot of natural gas per month and the CO emissions shall not exceed 3,906 pounds of CO per million cubic foot of natural gas per month. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per twelve (12) consecutive month period and the combination of all HAPs shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7, do not apply to this source.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 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.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4, the Permittee shall not generate fugitive dust to the extent that some portion of the material escapes 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.

326 IAC 8-1-6 (Volatile Organic Compounds: New Facilities: BACT)

The facilities at this source were constructed prior to January 1, 1980, and no new facilities have been added since that time. Therefore, the requirements of 326 IAC 8-1-6 do not apply to any of the facilities at this source.

326 IAC 8-4 (Petroleum Sources)

This source is located in Greene County, was constructed prior to January 1, 1980, and is not one of the types of operations regulated by 326 IAC 8-4. Therefore, the requirements of 326 IAC 8-4 do not apply to any of the facilities at this source.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

The facilities at this source commenced operation before March 21, 1972. Therefore, the requirements of 326 IAC 9-1 do not apply to any of the facilities at this source.

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

This source is located in Greene County. Therefore, the requirements of 326 IAC 10-1 do not apply to any of the facilities at this source.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8.

- (a) Reciprocating internal combustion compressor engines are not subject to this rule because they were all installed before the January 1, 1980, rule applicability date.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is located in Greene County. The facilities at this source commenced operation prior to October 4, 1974 and have PTE for VOC less than 100 tons per year. Therefore, the requirements of 326 IAC 8-6 do not apply to any of the facilities at this source.

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

This source is located in Greene County. Therefore, the requirements of 326 IAC 8-7 do not apply to any of the facilities at this source.

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

Reciprocating internal combustion engines are not considered as a manufacturing process, as defined under 326 IAC 6-3-1.5, since this facility only combusts natural gas and does not produce a product. Therefore, this rule does not apply to this facility.

State Rule Applicability - Insignificant Activities

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The natural gas-fired combustion sources (boiler, furnaces and heaters with no unit identification), all constructed after September 21, 1983, must comply with the requirements of 326 IAC 6-2-4. The emission limitations are based on the following equation given in 326 IAC 6-2-4

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

The heat input capacity of the natural gas-fired (boiler, furnaces and heaters) is 2.041MMBtu/hr total.

$$Pt = 1.09/(2.041)^{0.26} = 1.20 \text{ lb/MMBtu heat input.}$$

Pursuant to 326 IAC 6-2-4(a), for Q less than ten (10) MMBtu/hr, Pt shall not exceed 0.6 lbs/MMBtu. Therefore, the particulate matter emissions from the natural gas-fired boiler, furnaces and heaters is limited to 0.6 pound per MMBtu heat input total.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

There are no specific compliance monitoring requirements applicable to this source.

There are no testing requirements for this source.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 15, 2006 and additional information was received on August 2, 2007, October 1 and 11, November 5 and December 3, 2007.

Conclusion

The operation of this stationary natural gas compressor station shall be subject to the conditions of the attached FESOP Renewal No.: F 055-23656-00029.

Appendix A: Emission Summary

Company Name: Citizens Gas & Utility - Johnstown Compressor Station

Address City IN Zip: State Road 157, 4.5 miles North of Worthington, Johnstown, IN 47471

Permit No: F055-23656-00029

Reviewer: Janet Mobley

Date: November 9, 2006

Controlled Emissions

Emission Units	PM	PM10	SO2	VOC	CO	NOx	HAPs
Five (5) Reciprocating Engine Compressors				3.808	95.0	60.9	0.312
Natural Gas Combustion Insignificant Activities	0.017	0.068	0.005	0.049	0.751	0.894	0.017
Natural Gas Boiler	0.009	0.036	0.0029	0.026	0.402	0.478	
Natural Gas Emergency Generator Insignificant Activities	0.003	0.013	0.0002	0.041	1.269	1.392	0.028
Other Insignificant Activities	10	10		2.00			2.00
Total	10	10.1	0.0081	5.95	<100	<100	Single < 10 Total < 25

Uncontrolled Emissions

Emission Units	PM	PM10	SO2	VOC	CO	NOx	HAPs
Five (5) Reciprocating Engine Compressors				3.808	178.096	226.534	0.73
Natural Gas Combustion Insignificant Activities	0.017	0.068	0.005	0.049	0.751	0.894	0.017
Natural Gas Boiler	0.009	0.036	0.0029	0.026	0.402	0.478	
Natural Gas Emergency Generator Insignificant Activities	0.003	0.013	0.0002	0.041	1.269	1.392	0.028
Other Insignificant Activities	10	10		2.00			2.0
Total	10	10.1	0.0081	5.95	180.518	229.298	Single < 10 Total < 25

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions

Company Name: Citizens Gas & Utility - Johnstown Compressor Station
Address,City IN Zip: State Road 157, 4.5 Miles North of Worthington, Johnstown, Indiana 47471
Permit No.: F055-23656-00029
Reviewer: Janet Mobley
Date: December 5, 2006

HAPs - Organics						
Emission Factor in lb/MMcf	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
		2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.88E-05	1.07E-05	6.70E-04	1.61E-02	3.04E-05	
HAPs - Metals						
Emission Factor in lb/MMcf	Lead	Cadmium	Chromium	Manganese	Nickel	Total
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	HAPs
Potential Emission in tons/yr	4.47E-06	9.83E-06	1.25E-05	3.40E-06	1.88E-05	0.017

Methodology is the same as page 2.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Natural Gas-fired Reciprocating Engines
Emergency Generator
Limited to 500 hours of Operation

Company Name: Citizens Gas & Utility - Johnstown Compressor Station
Address, City, IN Zip: State Road 157, 4.5 Miles North of Worthington, Johnstown, Indiana 47471
Permit No.: F055-23656-00029
Reviewer: Janet Mobley
Date: December 5, 2006

Two stroke Lean Burn Engines
at Input Capacity

1.365	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	9.91E-03	3.84E-02	5.88E-04	3.17E+00	1.20E-01	3.86E-01
Potential Emission in tons/yr	0.003	0.013	0.000	1.082	0.041	0.132

Four stroke Lean Burn Engines
at Input Capacity

1.365	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	9.91E-03	7.71E-05	5.88E-04	4.08E+00	1.18E-01	3.17E-01
Potential Emission in tons/yr	0.003	0.000	0.000	1.392	0.040	0.108

Four stroke Rich Burn Engines
at Input Capacity

1.365	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	9.91E-03	9.50E-03	5.88E-04	2.21E+00	2.96E-02	3.72E+00
Potential Emission in tons/yr	0.003	0.003	0.000	0.754	0.010	1.269
Worst Case Emissions tons/yr	0.003	0.013	0.0002	1.392	0.041	1.269

Appendix A: Emission Calculations **Page 5 of 7 TSD App A**
Natural Gas-fired Reciprocating Engines
Emergency Generator Limited to 500 hours of Operation

Company Name: Citizens Gas & Utility - Johnstown Compressor Station
Address City IN Zip: State Road 157, 4.5 miles North of Worthington, Johnstown, IN 47471
Permit No.: F055-23656-00029
Reviewer: Janet Mobley
Date: December 5, 2006

HAP	Worst Case			
	Emission Factor - Two stroke lean burn (lb/MMBtu)	Emission Factor Four stroke lean burn (lb/MMBtu)	Emission Factor Four stroke rich burn (lb/MMBtu)	Potential to Emit (tons/yr)
1,1,2,2-Tetrachloroethane	6.63E-05	4.00E-05	2.53E-05	2.26E-05
1,1,2-Trichloroethane	5.27E-05	3.18E-05	1.53E-05	1.80E-05
1,1-Dichloroethane	3.91E-05	2.36E-05	1.13E-05	1.33E-05
1,2-Dichloroethane	4.22E-05	2.36E-05	1.13E-05	1.44E-05
1,2-Dichloropropane	4.46E-05	2.69E-05	1.30E-05	1.52E-05
1,3-Butadiene	8.20E-04	2.67E-04	6.63E-04	2.80E-04
1,3-Dichloropropene	4.38E-05	2.64E-05	1.27E-05	1.49E-05
2,2,4-Trimethylpentane	8.46E-04	2.50E-04	0.00E+00	2.89E-04
Acetaldehyde	7.76E-03	8.36E-03	2.79E-03	2.85E-03
Acrolein	7.78E-03	5.14E-03	2.63E-03	2.65E-03
Benzene	1.94E-03	4.40E-04	1.58E-03	6.62E-04
Biphenyl	3.95E-06	2.12E-04	0.00E+00	7.23E-05
Carbon Tetrachloride	6.07E-05	3.67E-05	1.77E-05	2.07E-05
Chlorobenzene	4.44E-05	3.04E-05	1.29E-05	1.52E-05
Chloroethane	0.00E+00	1.87E-06	0.00E+00	6.38E-07
Chloroform	4.71E-05	2.85E-05	1.37E-05	1.61E-05
Ethylbenzene	1.08E-04	3.97E-05	2.48E-05	3.69E-05
Ethylene Dibromide	7.34E-05	4.43E-05	2.13E-05	2.50E-05
Formaldehyde	5.52E-02	5.28E-02	2.05E-02	1.88E-02
Methanol	2.48E-03	2.50E-03	3.06E-03	1.04E-03
Methylene Chloride	1.47E-04	2.00E-05	4.12E-05	5.02E-05
n-Hexane	4.45E-04	1.11E-03	0.00E+00	3.79E-04
Naphthalene	9.63E-05	7.44E-05	9.71E-05	3.31E-05
Phenol	4.21E-05	2.40E-05	0.00E+00	1.44E-05
Styrene	5.48E-05	2.36E-05	1.19E-05	1.87E-05
Toluene	9.63E-04	4.08E-04	5.58E-04	3.29E-04
Vinyl Chloride	2.47E-05	1.49E-05	7.18E-06	8.43E-06
Xylene	2.68E-04	1.84E-04	1.95E-04	9.15E-05
			Total HAPs:	0.028

Methodology

Emission Factors are from AP 42 Tables 3.2-1, 3.2-2 and 3.2-3, revised July 2000
Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 500 hr/yr / (2,000 lb/ton)
195 HP = 1.365 mmBtu/hr assuming a standard 7,000 Btu's/hp-hr.

Appendix A: Emission Calculations

Natural Gas Reciprocating Compressor Engines

Units: Ajax01, Worth02, Worth03, InRand04 and InRand 05

Company Name: Citizens Gas & Utility - Johnstown Compressor Station

Address City IN Zip: State Road 157, 4.5 Miles North of Worthington, Johnstown, Indiana 47471

Permit No: F055-23656-00029

Reviewer: Janet Mobley

Date: December 5, 2006

Emissions calculated based on output rating (hp)	Compressor Engine	Each	Total
		Output Horsepower	Output Horsepower
	1 Ajax 2-cycle rich	230	230
Mechanical Output Horsepower (hp)	Potential Throughput hp-hr/yr	Total	
230.0	2014800.0	230	

Emission Factor in lb/hp-hr	Pollutant					
	PM	PM-10	SO2	NOx	VOC	CO
	0.0000	0.0000	0.0000	0.0240	0.00095	0.00331
Potential Emission in tons/yr	0.00	0.00	0.00	24.178	0.957	3.334

Used 2-cycle lean emission factors

Mechanical Output Horsepower (hp)	Potential Throughput hp-hr/yr	Compressor Engine	Each	Total
		2 Worthington 4--cycle rich 2 Ingersoll Rand 4-cycle rich	Output Horsepower	Output Horsepower
			550	1100
			500	1000
2100.0	18396000.0	Total	2100	

Emission Factor in lb/hp-hr	Pollutant					
	PM	PM-10	SO2	NOx	VOC	CO
	0.0000	0.0000	0.0000	0.0220	0.00031	0.01900
Potential Emission in tons/yr	0.00	0.00	0.00	202.4	2.851	174.8

Emission Factors are from AP42 (Supplement B 10/96), Table 3.2-1

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

Limited Natural Gas Throughput Calculation AP-42

Heating Value of Natural Gas	1050	Btu/CF
NOx Emission Factor 2-cycle lean	2.7	lb/mmBtu
NOx Emission Factor 4-cycle rich	2.3	lb/mmBtu
Limited NOx Emissions =	60.9	tons/yr
Worst Case Limited Natural Gas	48.6	MMCF/yr

FIRES 6.22	
1050	Btu/CF
3.17	lb/mmBtu
2.27	lb/mmBtu
60.9	tons/yr
48.6	MMCF/yr

Company Name: Citizens Gas & Utility - Johnstown Compressor Station
Address City IN Zip: State Road 157, 4.5 Miles North of Worthington, Johnstown, Indiana 47471
Permit No.: F055-23656-00029
Reviewer: Janet Mobley
Date: December 5, 2006

FIRES 6.22

HAPs Emission Calculations

1 Ajax 2-cycle rich Compressor

2.04 mmBtu/hr

4 Rich Burn Compressors 20.09 mmBtu/hr

HAP	Emission Factor lbs/mmBtu	HAP Emission tons/yr	HAP	Emission Factor lbs/mmBtu	HAP Emission tons/yr
Acetaldehyde	7.760E-03	0.0693372	Acrolein	2.63E-03	0.231390
Acrolein	7.780E-03	0.0695159	Benzene	1.58E-03	0.139010
Benzene	1.94E-03	0.0173343	1,3,-Butadiene	6.63E-04	0.058331
Biphenyl	3.95E-06	3.529E-05	Carbon Tetrachloride	1.77E-05	0.001557
1,3,-Butadiene	8.20E-04	0.0073269	Chlorobenzene	1.29E-05	0.001135
Carbon Tetrachloride	6.07E-05	0.0005424	Chloroform	1.37E-05	0.001205
Chlorobenzene	4.4E-05	0.0003931	1,3 Dichloropropene	1.27E-05	0.001117
Chloroform	4.71E-05	0.0004208	Ethylbenzene	2.48E-05	0.002182
1,3 Dichloropropene	4.38E-05	0.0003914	Ethylene dibromide	2.13E-05	0.001874
Ethylbenzene	1.08E-04	0.000965	Ethylene dichloride	1.13E-05	0.000994
Ethylene dibromide	7.34E-05	0.0006558	Formaldehyde	2.05E-02	1.803608
Ethylene dichloride	4.22E-05	0.0003771	Xylenes	1.95E-04	0.017156
Formaldehyde	5.52E-02	0.493223	Methanol	3.06E-03	0.269221
Xylenes	2.68E-04	0.0023946	Naphthalene	9.71E-05	0.008543
Methanol	2.48E-03	0.0221593	PAH	1.41E-04	0.012405
Hexane	4.45E-04	0.0039762	Propylene dichloride	1.30E-05	0.001144
Naphthalene	9.63E-05	0.0008605	Styrene	1.19E-05	0.001047
Phenol	4.21E-05	0.0003762	1,1,2,2, Tetrachloroethane	2.53E-05	0.002226
PAH	1.34E-04	0.0011973	Toluene	5.58E-04	0.049093
Propylene dichloride	4.46E-05	0.0003985	1,1,2 Trichloroethane	1.53E-05	0.001346
Styrene	5.48E-05	0.0004896	Vinyl Chloride	7.18E-06	0.000632
1,1,2,2, Tetrachloroethane	6.63E-05	0.0005924	Subtotal HAPs		2.605217365
Toluene	9.63E-04	0.0086046			
1,1,2 Trichloroethane	5.27E-05	0.0004709			
Vinyl Chloride	2.47E-05	0.0002207			
Subtotal HAPs		0.7022589			

Total HAPs 0.70 tons/yr
 From Compressors