



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: April 11, 2008

RE: Citizens Gas & Coke / 055-24615-00030

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



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

Citizens Gas & Coke Utility - Howesville Flare Sation County Road 1100 West, One Mile South of State Road 48 Howesville, Indiana 47438

(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.: F055-24615-00030	
Original signed by:	Issuance Date: April 11, 2008
Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Expiration Date: April 11, 2018

TABLE OF CONTENTS

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 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]	
B. GENERAL CONDITIONS	6
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]	
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]	
C. SOURCE OPERATION CONDITIONS	15
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]	
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]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Stack Height [326 IAC 1-7]	
C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-8-4(3)]	
C.9 Performance Testing [326 IAC 3-6]	

Compliance Requirements [326 IAC 2-1.1-11]

- C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

- C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
- C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.13 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.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.16 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.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1. EMISSIONS UNIT OPERATION CONDITIONS 22

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

- D.1.1 Natural Gas Desulfurized (SO₂) [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

D.2. EMISSIONS UNIT OPERATION CONDITIONS 23

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

- D.2.1 Particulate Matter (PM) Limitation [326 IAC 6-2-3]

Certification Form 24

Emergency Occurrence Form 25

Quarterly Report Form 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 desulfurization source.

Source Address:	County Road 1100 West, One Mile South of State Road 48, Howesville, Indiana 47438
Mailing Address:	R. R. 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:

One (1) natural gas desulfurization operation consisting of an amine absorber, a distillation tower to recover the amine, and a flare, known as FLARE, for the incineration of the removed hydrogen sulfide, installed in 1965, capacity: 50.0 million cubic feet of natural gas per day (2.08 million cubic feet of natural gas per hour). The flare is considered an integral part of the operation.

A.3 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:

(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 4.2305 million British thermal units per hour consisting of the following direct heating units:

- (1) One (1) heater rated at 0.156 million British thermal units per hour, located in the pump/lab room, installed in 1987.
- (2) One (1) heater rated at 0.075 million British thermal units per hour, located in the old office building, installed in 1981.
- (3) One (1) heater rated at 0.100 million British thermal units per hour, located in the meter building, installed in 1988.

and the following indirect heating units:

- (4) One (1) reboiler rated at 3.50 million British thermal units per hour, constructed in 1966. [326 IAC 6-2-3]

- (5) One (1) regenerator rated at 0.250 million British thermal units per hour, constructed in 1961. [326 IAC 6-2-3]
- (6) One (1) domestic hot water heater rated at 0.032 million British thermal units per hour, constructed in 2002. [326 IAC 6-2-4]
- (b) Process vessel degassing and cleaning to prepare for internal repairs.
- (c) 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.
- (d) 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.
- (e) Blowdown for any of the following: sight glass, boiler, compressors, pumps and cooling tower.
- (f) Emergency generators: Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower, consisting of one (1) natural gas fired reciprocating engine rated at 172 horsepower output.
- (g) Other activities or categories not previously identified: glycol and amine storage tanks, consisting of:
 - (1) One (1) 1,400 gallon glycol storage tank constructed in 1961.
 - (2) Two (2) 1,000 gallon amine storage tanks, one constructed in 1965 and the second in 1977.
- (h) Other activity or category not previously identified: methanol storage tanks, consisting of:
 - (1) One (1) 6,000 gallon methanol storage tank constructed in 1963.

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, F055-24615-00030, 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 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, as 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 describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 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 F055-24615-00030 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 Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(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, Indiana 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 if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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 shall be certified 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 2-8-10(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 the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in 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 emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at 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 2-8-10(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

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]

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 any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (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 two hundred fifty (250) 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.

(d) 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 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 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
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 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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.9 Performance Testing [326 IAC 3-6]

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.11 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 within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
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 the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

C.13 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 of the parameters.

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.15 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; and/or
 - (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.16 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.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee 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, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by 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" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.19 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 Desulfurization Operation

One (1) natural gas desulfurization operation consisting of an amine absorber, a distillation tower to recover the amine, and a flare, known as FLARE, for the incineration of the removed hydrogen sulfide, installed in 1965, capacity: 50.0 million cubic feet of natural gas per day (2.08 million cubic feet of natural gas per hour). The flare is considered an integral part of the operation.

(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 Natural Gas Desulfurized (SO₂) [326 IAC 2-8-4]

The amount of natural gas delivered to the desulfurization operation shall be less than a total of 3,683,720,930 cubic feet per twelve (12) consecutive month period. This will limit the SO₂ emissions from the desulfurization operation to less than ninety-nine (99.0) tons per year.

For purposes of determining compliance based on SO₂ emissions, the emissions shall not exceed 53.75 pounds of SO₂ per million cubic foot of natural gas. Compliance with this limit will, in conjunction with the PTE of the other emission units limit the source-wide potential to emit SO₂ to less than one hundred (100) tons per twelve (12) consecutive month 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 this facility.

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 natural gas delivered to the desulfurization operation. Records maintained monthly shall be complete and sufficient to establish compliance with the natural gas fuel usage limit and the SO₂ 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).

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:
- (1) one (1) reboiler rated at 3.50 million British thermal units per hour, constructed in 1966.
 - (2) one (1) regenerator, rated at 0.250 million British thermal units per hour, constructed in 1961. [326 IAC 6-2-3]

(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 6-2-3]

Pursuant to 326 IAC 6-2-3(d), particulate emissions from all facilities used for indirect heating purposes which were existing and in operation before June 8, 1972, (reboiler and regenerator), shall in no case exceed 0.8 lb/MMBtu heat.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL CERTIFICATION

Source Name: Citizens Gas & Coke Utility - Howesville Flare Station
Source Address: County Road 1100 West, One Mile South of State Road 48,
Howesville, IN 47438
Mailing Address: R.R. 2, Box 180, Worthington, IN 47471
FESOP Permit No.: F055-24615-00030

**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:

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) RENEWAL
EMERGENCY OCCURRENCE REPORT**

Source Name: Citizens Gas & Coke Utility - Howesville Flare Station
Source Address: County Road 1100 West, One Mile South of State Road 48, Howesville,
Indiana 47438
Mailing Address: R.R. 2, Box 180, Worthington, Indiana 47471
FESOP Permit No.: F055-24615-00030

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• 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) working 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 - Howesville Flare Station
Source Address: County Road 1100 West, One Mile South of State Road 48, Howesville, Indiana 47438
Mailing Address: R.R. 2, Box 180, Worthington, Indiana 47471
FESOP Permit No.: F055-24615-00030
Facility: SO₂ Desulfurization Operation
Parameter: Natural Gas Desulfurized
Limit: Less than a total of 3,683,720,930 cubic feet of natural gas desulfurized per twelve (12) consecutive month period, equivalent to less than 99.0 tons of SO₂ per year. The SO₂ emissions shall not exceed 53.75 pounds of SO₂ per million cubic foot of natural gas per month.

YEAR: _____

Month	Natural Gas Desulfurized (cubic feet)	Natural Gas Desulfurized (cubic feet)	Natural Gas Desulfurized (cubic feet)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

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) RENEWAL
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Citizens Gas & Coke Utility - Howesville Flare Station
 Source Address: County Road 1100 West, One Mile South of State Road 48, Howesville, Indiana 47438
 Mailing Address: R.R. 2, Box 180, Worthington, Indiana 47471
 FESOP Permit No.: F055-24615-00030

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Citizens Gas & Coke Utility - Howesville Flare Station
Source Location:	County Road 1100 West, One Mile South of State Road 48, Howesville, Indiana 47438
County:	Greene
SIC Code:	4922
Operation Permit No.:	F055-14428-00030
Permit Issuance Date:	June 24, 2002
Permit Renewal No.:	F055-24615-00030
Permit Reviewer:	Janet Mobley

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Citizens Gas & Coke Utility - Howesville Flare Station for the operation of a stationary natural gas desulfurization source.

History

On September 15, 2006, Citizens Gas & Coke Utility - Howesville Flare Station submitted an application to the OAQ requesting to renew its operating permit. Citizens Gas & Coke Utility - Howesville Flare Station was issued FESOP Renewal Permit No. F055-14428-00030 on June 24, 2002.

Permitted Emission Units and Pollution Control Equipment

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

One (1) natural gas desulfurization operation consisting of an amine absorber, a distillation tower to recover the amine, and a flare, known as FLARE, for the incineration of the removed hydrogen sulfide, installed in 1965, capacity: 50.0 million cubic feet of natural gas per day (2.08 million cubic feet of natural gas per hour). The flare is considered an integral part of the operation. (See page 3 of this TSD for details).

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 4.2305 million British thermal units per hour consisting of the following direct heating units:
 - (1) One (1) heater rated at 0.156 million British thermal units per hour, located in the pump/lab room, installed in 1987.
 - (2) One (1) heater rated at 0.075 million British thermal units per hour, located in the old office building, installed in 1981.
 - (3) One (1) heater rated at 0.100 million British thermal units per hour, located in the meter building, installed in 1988.

and the following indirect heating units:

- (4) One (1) reboiler rated at 3.50 million British thermal units per hour, constructed in 1966. [326 IAC 6-2-3]
 - (5) One (1) regenerator rated at 0.250 million British thermal units per hour, constructed in 1961. [326 IAC 6-2-3]
 - (6) One (1) water heater rated at 0.032 million British thermal units per hour, constructed in 2002. [326 IAC 6-2-4]
- (b) Process vessel degassing and cleaning to prepare for internal repairs.
 - (c) 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.
 - (d) 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.
 - (e) Blowdown for any of the following: sight glass, boiler, compressors, pumps and cooling tower.
 - (f) Emergency generators: Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower, consisting of one (1) natural gas fired reciprocating engine rated at 172 horsepower output.
 - (g) One (1) 1,400 gallon glycol storage tank, constructed in 1961.
 - (h) Two (2) 1,000 gallon amine storage tanks, one constructed in 1965 and the second in 1977.
 - (i) Other activity or category not previously identified: methanol storage tanks, consisting of:
 - (1) One (1) 6,000 gallon methanol storage tank constructed in 1963.

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 6,000 gallon methanol storage tank that had not been previously identified in the previous FESOP or the renewal application.

Emission Units and Pollution Control Equipment Removed from the Source

- (a) One (1) Hi-Volume heater rated at 0.108 million British thermal units per hour, installed in 1993, has failed and the source requested that it be removed from the permit.
- (b) One (1) water heater rated at 0.0415 million British thermal units per hour, constructed in 1958, failed and was replaced in 2002 with a unit rated at 0.032 MMBtu/hr.

Existing Approvals

There have not been any other approvals issued to the source since the last FESOP Renewal (F055-14428-00030) issued on June 24, 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.

Air Pollution Control Justification as an Integral Part of the Process

In the previous FESOP renewal (F055-14428-00030) issued June 24, 2002, a determination was made that the flare is used to remove the hydrogen sulfide from the natural gas and the flaring produces the sulfur dioxide. Therefore, the flare is not a control device for sulfur dioxide and would be considered an integral part of the sweetening process for the removal of hydrogen sulfide.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 6).

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 (NO_x) 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 NO_x 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 NO_x 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	0.037
PM ₁₀	0.149
SO ₂	490
VOC	1.187
CO	2.633
NO _x	3.032

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

HAPs	tons/yr
Benzene	0.0006229
Dichlorobenzene	0.0000222
Formaldehyde	0.01805
Hexane	0.033734
Toluene	0.000353
Lead Compounds	0.00000926
Cadmium Compounds	0.0000204
Chromium Compounds	0.0000259
Manganese Compounds	0.00000704
Nickel Compounds	0.0000389
Total	0.06

See Appendix A, pages 4 and 5 of 5, for a detailed breakdown of HAPs.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of SO₂ is equal to or greater than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source has agreed to continue to limit their SO₂ emissions to less than Title V levels, therefore the source will be issued a FESOP renewal.
- (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	Not reported
SO ₂	11
VOC	Not reported
CO	Not reported
NO _x	Not reported
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
Desulfurization Operation	-	-	< 99.0*	-	-	-	-
Insignificant Activity Natural Gas Combustion	0.034	0.137	0.0108	0.099	1.513	1.802	0.034
Insignificant Activity Natural Gas Emergency Generator	0.003	0.012	0.0002	0.036	1.12	1.23	0.025
Other Insignificant Activities	-	-	< 0.989	1.042	-	-	1.0
Total Emissions	0.037	0.149	< 100	1.187	2.633	3.032	Single < 10 Total < 25
Part 70 levels	100	100	100	100	100	100	Single < 10 Total < 25

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

* Refer to Page 7 of this TSD for the limits.

- (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) 1,000 gallon each 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 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.
- (g) 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.
- (h) The requirements of the New Source Performance Standard for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T are not included in this permit because the degreasing of process vessels at the source does not use an individual batch vapor, in-line vapor, in-line cold, or batch cold solvent cleaning machine. The source does not use halogenated HAP solvents in the degreasing process.

State Rule Applicability - Entire Source

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

The source 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 SO₂ in excess of 100 tons per year, the source has agreed to limit its SO₂ emissions to less than one hundred (100) tons per 12 month consecutive period with compliance to be determined at the end of each month. Therefore, 326 IAC 2-2 (PSD) is not applicable.

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

The operation of this natural gas desulfurization station will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. 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 SO₂ and the source agreed to limit SO₂ 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 SO₂ is greater than one hundred (100) tons per year but the source has agreed to limit SO₂ to less than 100 tons per twelve (12) month consecutive month period. Therefore 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of SO₂ shall be limited to less than one hundred (100) tons per year. 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 with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-7, are not applicable to the source.

The source has accepted a throughput limit that will not exceed 3,683,720,930 cubic feet of natural gas desulfurized per twelve (12) consecutive month period, equivalent to less than 99.0 tons of SO₂ per year for the natural gas desulfurization. (See page 2 of Appendix A of the TSD). This limit in combination with all the emission units located at the source will overall limit the SO₂ to less than one hundred (100) tons per year. For purposes of determining compliance based on SO₂ emissions, the emissions shall not exceed 53.75 pounds of SO₂ per million cubic foot of natural gas.

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. The facilities at this source commenced operation prior to January 1, 1980, and the source has PTE for VOC of less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply to this source.

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)

Since this facility only desulfurizes natural gas and does not produce a product, the requirements of 326 IAC 6-3-2 do not apply to any of the facilities at this source.

State Rule Applicability – Reboiler and Regenerator

326 IAC 6-2-3 (Particulate Emissions for Sources of Indirect Heating)

The natural gas-fired combustion sources (reboiler and regenerator) which were existing and in operation before September 21, 1983, must comply with the requirements of 326 IAC 6-2-3. Pursuant to 326 IAC 6-2-3(d), particulate emissions from all facilities used for indirect heating purposes which were existing and in operation before June 8, 1972, shall in no case exceed 0.8 lb/MMBtu heat.

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 were no compliance requirements in the previous approval and there are no new compliance requirements.

The SO₂ emission factor is rated an AA@ in AP-42 for desulfurization process. Therefore, no stack testing is required. 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 16, 2007.

Conclusion

The operation of this stationary natural gas desulfurization source shall be subject to the conditions of the attached FESOP Renewal No.: F055-24615-00030.

Company Name: Citizens Gas & Utility - Howesville Flare Station
 Address City IN Zip County Road 1100 West, One mile South of State Road 48, Howesville, IN 47438
 Permit No: F055-24615-00030
 Reviewer: Janet Mobley
 Date: May 2, 2007

Controlled Emissions							
Emission Units	PM	PM10	SO2	VOC	CO	NOx	HAPs
Desulfurization Operation			<99.0				
Natural GasCombustion	0.034	0.137	0.0108	0.099	1.513	1.802	0.034
Natural Gas Emergency Generator							
Insigificant Activities	0.003	0.012	0.0002	0.036	1.12	1.23	0.025
Other Insigificant Activities			<0.989	1.042			1
Total	0.037	0.149	<100.00	1.187	2.633	3.032	Single <10 Total <25

Uncontrolled Emissions							
Emission Units	PM	PM10	SO2	VOC	CO	NOx	HAPs
Desulfurization Operation			490.469				
Natural GasCombustion	0.034	0.137	0.0108	0.099	1.513	1.85	0.034
Natural Gas Emergency Generator							
Insigificant Activities	0.003	0.012	0.0002	0.036	1.12	1.23	0.025
Other Insigificant Activities			<0.989	1.042			1
Total	0.037	0.149	490	1.187	2.633	3.032	Single <10 Total <25

Company Name: Citizens Gas & Coke Utility - Howesville Fire Station
 Address City IN Zip: County Road 1100 West, One Mile South of State Road 48, Howesville, Indiana 47438
 FESOP Renewal: F055-24615-00030
 Reviewer: Janet Mobley
 Date: April 25, 2007

Sulfur Content
 Grains H2S per 100 cubic feet of gas
 26.0007

Average H2S
 Mole Percent (%)
 0.032

Capacity
 MMCF/Day
 50.00

Pollutant	
Emission Factor	SO2
Emission Factor in lbs/MMCF	16865
Potential Emission in tons/yr	53,750
Limited PTE in tons/yr	480,489
	99.0

Throughput Limit
 to Desulfurize
 Natural Gas
 MMCF/Year
 3683,720930

Methodology

827 grains of H2S per 100 standard cubic feet of natural gas equals 1 mole percent (%) H2S
 S = the mole percent H2S
 Emission Factor from AP-42 Chapter 5.3, Table 5.3.1 (1995)
 Emissions (tons/yr) = Capacity (MMCF/Day) * EF (lbs/MMCF) * 365 days/yr * 1 ton /2000 lbs
 1 lb-mole of H2S = 379.5 standard cubic feet

Company Name: Citizens Gas & Coke Utility - Howesville Flare Station
 Address City IN Zip: County Road 1100 West, One Mile South of State Road 48, Howesville, Indiana 47438
 Renewal No. F055-24615-00030
 Reviewer: Janet Mobley
 Date: April 25, 2007

Description Rating (mmBtu/hr)

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Description	Rating (mmBtu/hr)
		Pump/Lab Room Heater	0.1560
		Reboiler	3.5000
		Regenerator	0.2500
		Water Heater	0.0325
		Old Office Bldg Heater	0.0750
		Meter Bldg Heater	0.1000
		Total	4.1135

Emission Factor in lb/MMCF	Pollutant					
	PM ¹⁰	PM ^{2.5}	SO ₂	NO _x	VOC	CO
Potential Emission in tons/yr	0.034	0.137	0.0708	1.802	0.098	1.513

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 **Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burner/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 6,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission Factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-008-02, 1-03-008-02, and 1-03-008-03
 (SUPPLEMENT D 3189)
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF) x 2,000 lb/ton
 See page 3 for HAPs emissions calculations.

Emission Factor in lb/MMBtu	HAPs - Organics						Total HAPs
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.9E+00	Toluene 3.4E-03		
Potential Emission in tons/yr	3.78E-05	2.16E-05	1.36E-03	3.24E-02	6.13E-05		
Emission Factor in lb/MMBtu	HAPs - Metals						Total HAPs
	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.9E-04	Nickel 2.1E-03		
Potential Emission in tons/yr	8.01E-08	1.98E-05	2.52E-05	8.85E-08	3.78E-05	0.034	

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

Two stroke Lean Burn Engines
 Heat Input Capacity MM Btu/hr

HAP	Emission Factor (lb/MMBtu)		Emission Factor (lb/MMBtu)		Emission Factor (lb/MMBtu)		Emission Factor (lb/MMBtu)	
	Two stroke lean burn	Four stroke lean burn	Two stroke rich burn	Four stroke rich burn	PM10 (lb/MMBtu)	SO2 (lb/MMBtu)	NOx (lb/MMBtu)	CO (lb/MMBtu)
1,1,2,2-tetrachloroethane	6.63E-03	4.00E-05	3.18E-05	2.53E-05				
1,1,2-trichloroethane	5.27E-05	1.53E-05	1.89E-05	1.59E-05				
1,1-dichloroethane	3.91E-05	2.38E-05	1.13E-05	1.13E-05				
1,2-dichloroethane	4.22E-05	2.38E-05	1.13E-05	1.13E-05				
1,3-butadiene	4.46E-05	2.69E-05	1.30E-05	1.34E-05				
1,2-dichloropropane	8.20E-04	2.67E-04	6.63E-04	2.47E-04				
1,3-dichloropropane	4.39E-05	2.64E-05	1.27E-05	1.32E-05				
2,2,4-trimethylpentane	8.46E-04	2.50E-04	0.00E+00	2.55E-04				
Acetaldehyde	7.78E-03	8.36E-03	2.79E-03	2.52E-03				
Acrolein	1.94E-03	4.40E-04	2.63E-03	2.24E-03				
Benzene	3.99E-06	2.12E-04	1.58E-03	3.84E-04				
Biphenyl	6.07E-03	3.67E-05	0.00E+00	6.98E-05				
Carbon tetrachloride	4.44E-05	3.04E-05	1.77E-05	1.83E-05				
Chlorobenzene	0.00E+00	3.04E-05	1.29E-05	1.34E-05				
Chloroform	4.71E-05	2.88E-05	1.37E-05	1.42E-05				
Ethylbenzene	1.08E-04	3.97E-05	2.48E-05	3.25E-05				
Ethylene Dibromide	7.34E-05	4.43E-05	2.13E-05	2.21E-05				
Formaldehyde	5.52E-02	2.09E-02	1.68E-02	1.66E-02				
Methanol	2.48E-03	3.06E-03	9.21E-04	9.21E-04				
Methylene Chloride	1.47E-04	2.00E-05	4.12E-05	4.42E-05				
n-Heptane	4.45E-04	0.00E+00	1.11E-03	3.24E-04				
Naphthalene	9.63E-05	7.44E-05	9.71E-05	2.92E-05				
Phenol	4.21E-05	2.40E-05	0.00E+00	1.27E-05				
Styrene	3.48E-05	2.38E-05	1.19E-05	1.65E-05				
Toluene	9.63E-04	4.09E-04	5.89E-04	2.90E-04				
Vinyl Chloride	2.47E-05	1.49E-05	7.18E-06	7.43E-06				
Xylene	2.68E-04	1.84E-04	1.98E-04	8.07E-05				
Total HAPs:				0.025				

HAP	Emission Factor (lb/MMBtu)		Emission Factor (lb/MMBtu)		Emission Factor (lb/MMBtu)		Emission Factor (lb/MMBtu)	
	Two stroke lean burn	Four stroke lean burn	Two stroke rich burn	Four stroke rich burn	PM10 (lb/MMBtu)	SO2 (lb/MMBtu)	NOx (lb/MMBtu)	CO (lb/MMBtu)
1,1,2,2-tetrachloroethane	6.63E-03	4.00E-05	3.18E-05	2.53E-05				
1,1,2-trichloroethane	5.27E-05	1.53E-05	1.89E-05	1.59E-05				
1,1-dichloroethane	3.91E-05	2.38E-05	1.13E-05	1.13E-05				
1,2-dichloroethane	4.22E-05	2.38E-05	1.13E-05	1.13E-05				
1,3-butadiene	4.46E-05	2.69E-05	1.30E-05	1.34E-05				
1,2-dichloropropane	8.20E-04	2.67E-04	6.63E-04	2.47E-04				
1,3-dichloropropane	4.39E-05	2.64E-05	1.27E-05	1.32E-05				
2,2,4-trimethylpentane	8.46E-04	2.50E-04	0.00E+00	2.55E-04				
Acetaldehyde	7.78E-03	8.36E-03	2.79E-03	2.52E-03				
Acrolein	1.94E-03	4.40E-04	2.63E-03	2.24E-03				
Benzene	3.99E-06	2.12E-04	1.58E-03	3.84E-04				
Biphenyl	6.07E-03	3.67E-05	0.00E+00	6.98E-05				
Carbon tetrachloride	4.44E-05	3.04E-05	1.77E-05	1.83E-05				
Chlorobenzene	0.00E+00	3.04E-05	1.29E-05	1.34E-05				
Chloroform	4.71E-05	2.88E-05	1.37E-05	1.42E-05				
Ethylbenzene	1.08E-04	3.97E-05	2.48E-05	3.25E-05				
Ethylene Dibromide	7.34E-05	4.43E-05	2.13E-05	2.21E-05				
Formaldehyde	5.52E-02	2.09E-02	1.68E-02	1.66E-02				
Methanol	2.48E-03	3.06E-03	9.21E-04	9.21E-04				
Methylene Chloride	1.47E-04	2.00E-05	4.12E-05	4.42E-05				
n-Heptane	4.45E-04	0.00E+00	1.11E-03	3.24E-04				
Naphthalene	9.63E-05	7.44E-05	9.71E-05	2.92E-05				
Phenol	4.21E-05	2.40E-05	0.00E+00	1.27E-05				
Styrene	3.48E-05	2.38E-05	1.19E-05	1.65E-05				
Toluene	9.63E-04	4.09E-04	5.89E-04	2.90E-04				
Vinyl Chloride	2.47E-05	1.49E-05	7.18E-06	7.43E-06				
Xylene	2.68E-04	1.84E-04	1.98E-04	8.07E-05				
Total HAPs:				0.025				

HAP	Emission Factor (lb/MMBtu)		Emission Factor (lb/MMBtu)		Emission Factor (lb/MMBtu)		Emission Factor (lb/MMBtu)	
	Two stroke lean burn	Four stroke lean burn	Two stroke rich burn	Four stroke rich burn	PM10 (lb/MMBtu)	SO2 (lb/MMBtu)	NOx (lb/MMBtu)	CO (lb/MMBtu)
1,1,2,2-tetrachloroethane	6.63E-03	4.00E-05	3.18E-05	2.53E-05				
1,1,2-trichloroethane	5.27E-05	1.53E-05	1.89E-05	1.59E-05				
1,1-dichloroethane	3.91E-05	2.38E-05	1.13E-05	1.13E-05				
1,2-dichloroethane	4.22E-05	2.38E-05	1.13E-05	1.13E-05				
1,3-butadiene	4.46E-05	2.69E-05	1.30E-05	1.34E-05				
1,2-dichloropropane	8.20E-04	2.67E-04	6.63E-04	2.47E-04				
1,3-dichloropropane	4.39E-05	2.64E-05	1.27E-05	1.32E-05				
2,2,4-trimethylpentane	8.46E-04	2.50E-04	0.00E+00	2.55E-04				
Acetaldehyde	7.78E-03	8.36E-03	2.79E-03	2.52E-03				
Acrolein	1.94E-03	4.40E-04	2.63E-03	2.24E-03				
Benzene	3.99E-06	2.12E-04	1.58E-03	3.84E-04				
Biphenyl	6.07E-03	3.67E-05	0.00E+00	6.98E-05				
Carbon tetrachloride	4.44E-05	3.04E-05	1.77E-05	1.83E-05				
Chlorobenzene	0.00E+00	3.04E-05	1.29E-05	1.34E-05				
Chloroform	4.71E-05	2.88E-05	1.37E-05	1.42E-05				
Ethylbenzene	1.08E-04	3.97E-05	2.48E-05	3.25E-05				
Ethylene Dibromide	7.34E-05	4.43E-05	2.13E-05	2.21E-05				
Formaldehyde	5.52E-02	2.09E-02	1.68E-02	1.66E-02				
Methanol	2.48E-03	3.06E-03	9.21E-04	9.21E-04				
Methylene Chloride	1.47E-04	2.00E-05	4.12E-05	4.42E-05				
n-Heptane	4.45E-04	0.00E+00	1.11E-03	3.24E-04				
Naphthalene	9.63E-05	7.44E-05	9.71E-05	2.92E-05				
Phenol	4.21E-05	2.40E-05	0.00E+00	1.27E-05				
Styrene	3.48E-05	2.38E-05	1.19E-05	1.65E-05				
Toluene	9.63E-04	4.09E-04	5.89E-04	2.90E-04				
Vinyl Chloride	2.47E-05	1.49E-05	7.18E-06	7.43E-06				
Xylene	2.68E-04	1.84E-04	1.98E-04	8.07E-05				
Total HAPs:				0.025				

Methodology

Emission Factors are from AP 42 Tables 3.2-1, 3.2-2 and 3.2-3, revised July 2000
 Emission Factor (lb/MMBtu) = Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu) / (2000 lb/hr)
 Worst Case Emissions tons/yr = Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu) / (2000 lb/hr) x 1.204 mmBtu/hr assuming a standard 7,000 Btu/lb-hr.

Methanol Storage Tank Insignificant Activity

Company Name: Citizens Gas & Coke Utility Howesville Flare Station

FESOP Renewal No.: F055-24615-00030

Emissions Report - Detail Format TANKS 4.09d
 Individual Tank Emission Totals

Emission Report for: January, February, March, April, May, June, July, August, September, October, November, December

CGCU Howesville - Horizontal Tank
 Howesville, Indiana

Components	Losses(lbs)		Total Emissions	.042 tons/year
	Working Loss	Breathing Loss		
Methyl alcohol	5.62	77.59	83.21	