PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION

Panhandle Eastern Pipe Line Company
9371 Zionsville Road
Indianapolis, Indiana 46268

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15, IC 13-17 and the Code of Indianapolis and Marion County, Chapter 511.

Operation Permit No.: T097-5937-00095	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management Robert F. Holm, PH.D, Administrator Indianapolis Environmental Resources Management Division	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and The Indianapolis Environmental Resources Management Division (ERMD).The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary natural gas transmission operation.

Responsible Official:	Mr. T. Holeman
Source Address:	9371 Zionsville Road, Indianapolis, Indiana 46268
Mailing Address:	P.O. Box 1642, Houston, Texas 77251-1642
SIC Code:	4922
County Location:	Marion
County Status:	Attainment
Source Status:	Part 70 Permit Program

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

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

(a) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1401, with a maximum capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1401, installed in 1937.

(b) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1402, with a maximum capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1402, installed in 1937.

(c) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1403, with a maximum capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1403, installed in 1937.

(d) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1404, with a maximum capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1404, installed in 1937.

(e) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1405, with a maximum capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1405, installed in 1940.

(f) Clark 1600 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1406, with a maximum capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1406, installed in 1946.

(g) Clark 1600 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1407, with a maximum capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1407, installed in 1946.

(h) Clark 2000 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1408, with a maximum capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1408, installed in 1951.

(i) Clark 2000 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1409, with a maximum capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1409, installed in 1951.

(j) Clark 2350 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1410, with a maximum capacity of 18.8 MMBtu/hr, using no equipment as control, and exhausting to stack S1410, installed in 1951.

(k) Cooper-Bessemer 2700 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1411, with a maximum capacity of 18.9 MMBtu/hr, using no equipment as control, and exhausting to stack S1411, installed in 1956.

(l) Cooper-Bessemer 2700 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1412, with a maximum capacity of 18.9 MMBtu/hr, using no equipment as control, and exhausting to stack S1412, installed in 1956.

(m) Cooper-Bessemer 2700 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1413, with a maximum capacity of 18.9 MMBtu/hr, using no equipment as control, and exhausting to stack S1413, installed in 1956.

(n) Cooper-Bessemer 3400 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1414, with a maximum capacity of 23.8 MMBtu/hr, using no equipment as control, and exhausting to stack S1414, installed in 1965.

(o) Dresser Rand 10,000 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1415, with a maximum capacity of 72 MMBtu/hr, using no equipment as control, and exhausting to stack S1415, installed in 1971.

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

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

(1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

(2) The following VOC and HAP storage containers:

A) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

B) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(4) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(5) Emergency generators as follows:

A) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.

(6) Natural gas fugitive emissions from pipeline components.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22)

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7, as set out in this permit in the Section B condition entitled “Permit Shield.”

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15.

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, Code of Indianapolis and Marion County Section 511-102, 326 IAC 1-2 , IAPCB Reg. 1-2-2 and 326 IAC 2-7 shall prevail.

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

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f), IC 13-15-5-3 and Code of Indianapolis and Marion County Section 511-503.

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

(a) Unless other wise stated, all terms and conditions in this permit, including any provisions designed to limit the sources potential to emit, are enforceable by IDEM.

(b) The IAPCB has adopted by reference state rules listed in Attachment A of this permit. The version adopted by reference includes all amendments, additions and repeals filed with the Secretary of State through August 10, 1997 and published in the Indiana Register September 1, 1997, unless otherwise indicated in the adoption by reference.

For the purposes of this permit, all state rules adopted by reference by the IAPCB are enforceable by ERMD using local enforcement procedures.

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

(d) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by ERMD using local enforcement procedures.

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

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

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

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

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

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

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

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

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

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(b) The Permittee shall furnish to IDEM, OAM, and ERMD within a reasonable time, any information that IDEM, OAM, and ERMD may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, and ERMD copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, and ERMD along with a claim of confidentiality under 326 IAC 17.

If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) 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.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance

2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

(5) Any insignificant activity that has been added without a permit revision; and

(6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, and ERMD may require to determine the compliance status of the source.

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

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM,

OAM, and ERMD 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 Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

ERMD
Telephone No.: 317-327-2234 (ask for Data Compliance)
Facsimile No.: 317-327-2274

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

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

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, and ERMD may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, and ERMD by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit;
or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit,

IDEM, OAM, and ERMD shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, and ERMD has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, and ERMD has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

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

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

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

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

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, and ERMD determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM, and ERMD to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, and ERMD at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, and ERMD may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and ERMD and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

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

and

Environmental Resources Management Division
Air Quality Management Section, Permitting
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed

by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM, and ERMD, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, and ERMD, 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, OAM, and ERMD**,** any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, and ERMD fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

and

Environmental Resources Management Division
Air Quality Management Section, Permitting
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 and IAPCB Reg. 2-1-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management

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

and

Environmental Resources Management Division
Air Quality Management Section, Permitting
2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, and ERMD in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision,

subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

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

B.23 Construction Permit Requirement [326 IAC 2] [IAPCB Reg. 2-1-1]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2 and IAPCB Reg. 2-1-1.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, ERMD, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, and ERMD or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, and ERMD nor an authorized representative, may disclose the information unless and until IDEM, OAM, and

ERMD makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 and IAPCB Reg. 17 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9][IAPCB Reg. 17]

(2) The Permittee**,** IDEM, OAM, and ERMD acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

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

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and ERMD, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) IDEM, OAM, and ERMD shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, and ERMD, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM 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 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Major Source

Pursuant to 326 IAC 2-7 (Part 70 Permit Program) this source is a major source due to NO_x, VOC, and CO emissions exceeding 100 tons per year potential to emit and HAP emissions that exceed 25 tons per year potential to emit.

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

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.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 Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaged 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.

This condition is not federally enforceable.

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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

The Permittee shall not open burn any material except as provided in Chapter 4, Code of Indianapolis and Marion County and IAPCB Reg 4-1. Provisions of the code that are more stringent than 326 IAC 4-1 are locally enforceable only by ERMD.

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] [IAPCB Reg. II-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) and IAPCB Reg. II-4. 326 IAC 6-4-2(4) and IAPCB Reg. II-4 is not federally enforceable.

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

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

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

and

Environmental Resources Management Division
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and

40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

C.10 Performance Testing [326 IAC 3-6]

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

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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

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

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

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

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required

monitoring related to that equipment, no more than ninety (90) days (this time frame is determined on a case by case basis, but no more than ninety (90) days)) after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

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

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Monitoring Methods [326 IAC 3]

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

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on November 30, 1989.

(b) If the ERP is disapproved by IDEM, OAM, and ERMD, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(e) Upon direct notification by IDEM, OAM, and ERMD, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in

the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, and ERMD that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, and ERMD that the Risk Management Plan is being properly implemented.

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

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM and ERMD, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM and ERMD shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM and ERMD within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM and ERMD reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the

"responsible official" as defined by 326 IAC 2-7-1(34).

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

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

(a) The Permittee shall submit an, annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15th of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Contain actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Contain actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

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

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

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

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, or ERMD representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or ERMD makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or ERMD within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in

this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(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, OAM, and ERMD on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

(1) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1401, with a maximum capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1401, installed in 1937.

(2) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1402, with a maximum capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1402, installed in 1937.

(3) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1403, with a maximum capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1403, installed in 1937.

(4) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1404, with a maximum capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1404, installed in 1937.

(5) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1405, with a maximum capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1405, installed in 1940.

(6) Clark 1600 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1406, with a maximum capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1406, installed in 1946

.

(7) Clark 1600 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1407, with a maximum capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1407, installed in 1946.

(8) Clark 2000 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1408, with a maximum capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1408, installed in 1951.

(9) Clark 2000 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1409, with a maximum capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1409, installed in 1951.

(10) Clark 2350 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1410, with a maximum capacity of 18.8 MMBtu/hr, using no equipment as control, and exhausting to stack S1410, installed in 1951.

(11) Cooper-Bessemer 2700 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1411, with a maximum capacity of 18.9 MMBtu/hr, using no equipment as control, and exhausting to stack S1411, installed in 1956.

(12) Cooper-Bessemer 2700 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1412, with a maximum capacity of 18.9 MMBtu/hr, using no equipment as control, and exhausting to stack S1412, installed in 1956.

(13) Cooper-Bessemer 2700 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1413, with a maximum capacity of 18.9 MMBtu/hr, using no equipment as control, and exhausting to stack S1413, installed in 1956.

(14) Cooper-Bessemer 3400 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1414, with a maximum capacity of 23.8 MMBtu/hr, using no equipment as control, and exhausting to stack S1414, installed in 1965.

(15) Dresser Rand 10,000 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1415, with a maximum capacity of 72 MMBtu/hr, using no equipment as control, and exhausting to stack S1415, installed in 1971.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

D.1.1 Record Keeping Requirements

(a) The permittee shall keep records of the amount of natural gas combusted at the compressor station.

(b) All records shall be maintained in accordance with Section C.17 - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Panhandle Eastern Pipe Line Company
Source Address: 9371 Zionsville Road, Indianapolis, Indiana 46268
Mailing Address: P.O. Box 1642, Houston, Texas, 77251-1642
Part 70 Permit No.: 097-5937-00095

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:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 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 MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION
2700 South Belmont Ave.
Indianapolis Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Panhandle Eastern Pipe Line Company
Source Address: 9371 Zionsville Road, Indianapolis, Indiana 46268
Mailing Address: P.O. Box 1642, Houston, Texas, 77251-1642
Part 70 Permit No: 097-5937-00095

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

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the ERMD and OAM, within four (**4**) business hours; and C The Permittee must submit notice in writing or by facsimile within two (**2**) days, and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (**10**) calendar days

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

Attachment A

The following state rule have been adopted by reference by the Indianapolis Air Pollutant Control Board and are enforceable by Indianapolis Environmental Resources Management Division (ERMD) using local enforcement procedures.

(1) 326 IAC 1-1-1 through 1-1-3 and 1-1-5;
(2) 326 IAC 1-2-1 through 1-2-91 (In addition, the IAPCB has adopted several local definitions);
(3) 326 IAC 1-3-1 through 1-3-4;
(4) 326 IAC 1-4-1 (The IAPCB added to the adoption by reference a citation to 61 FR 58482 (November 15, 1996));
(5) 326 IAC 1-5-1 through 1-5-5;
(6) 326 IAC 1-6-1 through 1-6-6;
(7) 326 IAC 1-7-1 through 1-7-5
(8) 326 IAC 2-3-1 through 2-3-5;
(9) 326 IAC 2-4-1 through 2-4-6;
(10) 326 IAC 2-6-1 through 2-6-4;
(11) 326 IAC 2-7-1 through 2-7-18, 2-7-20 through 2-7-25;
(12) 326 IAC 2-8-1 through 2-8-15, 2-8-17 through 2-8-10;
(13) 326 IAC 2-9-1 through 2-9-14;
(14) 326 IAC 2-10-1 through 2-10-5 (The IAPCB adoption adds the language “state or local” immediately after the word “federal” in 326 IAC 2-10-1);
(15) 326 IAC 2-11-1, 2-11-3 and 2-11-4 (The IAPCB adoption adds the language “federal, state or local” immediately after the word “by” in 326 IAC 2-11-1);
(16) 326 IAC 3-1.1-1 through 3-1.1-5;
(17) 326 IAC 3-2.1-1 through 3-2.1-5;
(18) 326 IAC 3-3-1 through 3-3-5;
(19) 326 IAC 4-2-1 through 4-2-2;
(20) 326 IAC 5-1-1 (a), (b) and c) (5), 5-1-2 (1), (2)(A), (2)c) (4), 5-1-3 through 5-1-5, 5-1-7;
(21) 326 IAC 7-1.1-1 and 7-1.1-2;
(22) 326 IAC 7-2-1;
(23) 326 IAC 7-3-1 and 7-3-2;
(24) 326 IAC 7-4-2(28) through (31) (Instead of adopting by reference 7-4-2(1) through (27), the IAPCB regulation substitutes the same requirements listed in a format in which the companies are alphabetized and emission points known to no longer exist have been deleted);
(25) 326 IAC 8-1-0.5 except (b), 8-1-1 through 8-1-2, 8-1-3 except c), (g) and (i), 8-1-5 through 8-1-12;
(26) 326 IAC 8-2-1 through 8-2-12 (The IAPCB adoption by reference of 8-2- 5 adds additional language specific to Zimmer Paper Products, Incorporated as subpart c);
(27) 326 IAC 8-3-1 through 8-3-7;
(28) 326 IAC 8-4-1 through 8-4-5, 8-4-6 (a)(6), (a)(8) and (a)(14) and 8-4-6(b)(1), (b)(3) and 8-4-6c) (In place of 8-4-6(b)(2), which was not adopted, the IAPCB adopted language requiring a pressure relief valve set to release at no less than four and eight-tenths (4.8) Kilo Pascals (seven-tenths (0.7) pounds per square inch)), 8-4-7 except (e), 8-4-8 and 8-4-9;
(29) 326 IAC 8-5-1 through 8-5-4, 8-5-5 except (a)(3) and (d)(3);
(30) 326 IAC 8-6-1 and 8-6-2;
(31) 326 IAC 9-1-1 and 9-1-2;
(32) 326 IAC 11-1-1 through 11-1-2;
(33) 326 IAC 11-2-1 through 11-2-3;
(34) 326 IAC 11-3-1 through 11-3-6;
(35) 326 IAC 14-1-1 through 14-1-4;

Attachment A continued

(36) 326 IAC 14-2-1 except 40 CFR 61.145;
(37) 326 IAC 14-3-1;
(38) 326 IAC 14-4-1;
(39) 326 IAC 14-5-1;
(40) 326 IAC 14-6-1;
(41) 326 IAC 14-7-1;
(42) 326 IAC 14-8-1 through 14-8-5;
(43) 326 IAC 15-1-1, 15-1-2(a)(1), (a)(2) and (a)(8), 15-1-3 and 15-1-4;
(44) 326 IAC 20-1-1 through 20-1-4 (In 20-1-3(b)(2) the adoption states that “permitting authority” means the commissioner of IDEM or the administrator of ERMD, whichever is applicable);
(45) 326 IAC 20-2-1;
(46) 326 IAC 20-3-1;
(47) 326 IAC 20-4-1;
(48) 326 IAC 20-5-1;
(49) 326 IAC 20-6-1;
(50) 326 IAC 20-7-1;
(51) 326 IAC 20-8-1;
(52) 326 IAC 20-9-1;
(53) 326 IAC 20-14-1;
(54) 326 IAC 20-15-1;
(55) 326 IAC 20-16-1;
(56) 326 IAC 20-17-1;
(57) 326 IAC 20-18-1;
(58) 326 IAC 20-19-1;
(59) 326 IAC 20-20-1;
(60) 326 IAC 20-21-1;
(61) 326 IAC 21-1-1 (The adoption states that “or the administrator of ERMD” is added in (b));
(62) 326 IAC 22-1-1 (The adoption states that “or the administrator of ERMD” is added in (b)).

Indiana Department of Environmental Management
Office of Air Management
and
Indianapolis Environmental Resources Management Division

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: **Panhandle Eastern Pipe Line Company**
Source Location: **9371 Zionsville Road, Indianapolis, Indiana 46268**
County: **Marion**
SIC Code: **4922**
Operation Permit No.: **097-5937-00095**
Permit Reviewer: **Kevin Leone**

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Panhandle Eastern Pipe Line Company relating to the operation of natural gas transmission.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(1) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1401, with a maximum capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1401, installed in 1937.

(2) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1402, with a maximum capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1402, installed in 1937.

(3) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1403, with a maximum capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1403, installed in 1937.

(4) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1404, with a maximum capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1404, installed in 1937.

(5) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1405, with a maximum capacity of 12.09 MMBtu/hr, using no equipment as control, and exhausting to stack S1405, installed in 1940.

(6) Clark 1600 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1406, with a maximum capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1406, installed in 1946

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(7) Clark 1600 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1407, with a maximum capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1407, installed in 1946.

(8) Clark 2000 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1408, with a maximum capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1408, installed in 1951.

(9) Clark 2000 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1409, with a maximum capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1409, installed in 1951.

(10) Clark 2350 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1410, with a maximum capacity of 18.8 MMBtu/hr, using no equipment as control, and exhausting to stack S1410, installed in 1951.

(11) Cooper-Bessemer 2700 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1411, with a maximum capacity of 18.9 MMBtu/hr, using no equipment as control, and exhausting to stack S1411, installed in 1956.

(12) Cooper-Bessemer 2700 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1412, with a maximum capacity of 18.9 MMBtu/hr, using no equipment as control, and exhausting to stack S1412, installed in 1956.

(13) Cooper-Bessemer 2700 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1413, with a maximum capacity of 18.9 MMBtu/hr, using no equipment as control, and exhausting to stack S1413, installed in 1956.

(14) Cooper-Bessemer 3400 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1414, with a maximum capacity of 23.8 MMBtu/hr, using no equipment as control, and exhausting to stack S1414, installed in 1965.

(15) Dresser Rand 10,000 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1415, with a maximum capacity of 72 MMBtu/hr, using no equipment as control, and exhausting to stack S1415, installed in 1971.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

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

(1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

(2) The following VOC and HAP storage containers:

A) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

B) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(4) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(5) Emergency generators as follows:

A) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.

(6) Natural gas fugitive emissions from pipeline components.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(1) OP 0095, issued on February 18, 1994

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit 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 administratively complete Part 70 permit application for the purposes of this review was received on May 29, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Pages 1-8).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	12.7
PM-10	12.7
SO_2	less than 1
VOC	200.2
CO	1010.3
NO_x	5504.5

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Formaldehyde	55.8

(a) The potential emissions (as defined in 326 IAC 1-2-55) of NOx, CO, and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

and

(b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

and

(c) 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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 STEPS emission data.

Pollutant	Actual Emissions (tons/year)
PM	less than 1
PM-10	less than 1
SO_2	less than 1
VOC	101.42
CO	290.39
NO_x	2464
Formaldehyde	24.58

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (326 IAC 12) applicable to this source. 40 CFR Part 60 Subpart KKK, Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants, does not apply to this source because 40 CFR 60.630(e) exempts compressor stations not located at a natural gas processing plant as defined by 40 CFR 60.631. A natural gas processing plant means any processing site engaged in the extraction of natural gas liquids from field gas (feedstock gas) or fractionation of mixed natural gas liquids to natural gas products.

(b) 40 CFR 60.330 Subpart GG, the New Source Performance Standard for Stationary Gas Turbines, does not apply to this source because there are no gas turbine engines.

(b) The four (4) storage tanks are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.11, Subpart Kb) because they have less than 10,000 gallons capacity.

(c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) applicable to this source.

State Rule Applicability - Entire Source

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

The source is required to submit an Emergency Reduction Plan (ERP) per 326 IAC 1-5 because potential emissions of the regulated pollutants NOx, VOC, and CO exceed 100 tons per year.

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

There are no PSD requirements applicable to this source because it does not meet the definition of a major PSD source as defined in 326 IAC 2-2-1; the date of last construction for this source was in 1971 and no modifications to existing facilities that would increase PTE have been made since.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than 10 (Ten) tons per year of NOx and VOC and is located in Marion County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15th of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

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

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6 (Particulate Limitations)

All significant Emission Units at this source involve natural gas combustion and are not classified as indirect heating. A gaseous fuel is consumed and does not appear to have an applicable process weight rate limitation. There appears to be no reciprocating engine rules and, as a result, there appears to be no applicable PM emission limit.

326 IAC 7 (Sulfur Dioxide Rules)

All significant Emission Units at this source involve natural gas combustion and do not appear to have appreciable SO_2 emissions. Potential SO_2 emissions appear to be lower than the applicability threshold (25 tons per year). There appears to be no reciprocating engine rules and, as a result, there appears to be no applicable SO_2 emission limit.

326 IAC 8-1-6 (BACT Synthetic Minor Limitation)

326 IAC 8-1-6 is not applicable to emission units # 1401 to 1415 because these facilities were constructed prior to January 1, 1980.

326 IAC 9-1-1(Carbon Monoxide Emissions Rules)

This rule does not apply to this facility since this facility was constructed prior to March 21, 1972.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See attached calculations for detailed air toxic calculations (Appendix A)

Conclusion

The operation of this Natural Gas Transmission Operation shall be subject to the conditions of the attached proposed Part 70 Permit No. T097-5937-00095.

Indiana Department of Environmental Management
Office of Air Management

and
Indianapolis Environmental Resources Management Division

Addendum to the
Technical Support Document for Part 70 Operating Permit

Source Name:	**Panhandle Eastern Pipe Line Company**
Source Location:	**9371 Zionsville Road, Indianapolis, Indiana 46268**
County:	**Marion**
SIC Code:	**4922**
Operation Permit No.:	**T097-5937-00095**
Permit Reviewer:	**Kevin Leone**

On August 25th, 1998, the Office of Air Management (OAM) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Panhandle Eastern Pipe Line Company had applied for a Part 70 Operating Permit to operate a natural gas transmission facility. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On September 11th, Panhandle Eastern Pipe Line Company submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

Comment 1:

Panhandle Eastern Pipe Line Company submitted comments requesting edits to the draft permit concerning discrepancies in fuel consumption rates and horsepower of some of the internal combustion engines, as well as a spelling error.

Response to Comment 1:

These changes do not effect emissions, rules, or conditions as the new fuel consumption rates and horsepower have already been changed in the calculations; this addendum is simply changing misprinted numbers and words in Section A and Section D of the permit.

Changes will be made to the final Part 70 permit to address the comments.

The following changes will be made to the final Part 70 permit:

On page 2, Table of Contents, the following was deleted:

B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6] 20

On page 4, Section A Source Summary and Section D.1 Facility Operation Conditions, the following changes were made (Changes are strikeout and bold for emphasis):

1.

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

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

(a) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1401, with a maximum capacity of ~~11.7~~ **12.09** MMBtu/hr, using no equipment as control, and exhausting to stack S1401, installed in 1937.

(b) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1402, with a maximum capacity of ~~11.7~~ **12.09** MMBtu/hr, using no equipment as control, and exhausting to stack S1402, installed in 1937.

(c) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1403, with a maximum capacity of ~~11.7~~ **12.09** MMBtu/hr, using no equipment as control, and exhausting to stack S1403, installed in 1937.

(d) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1404, with a maximum capacity of ~~11.7~~ **12.09** MMBtu/hr, using no equipment as control, and exhausting to stack S1404, installed in 1937.

(e) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1405, with a maximum capacity of ~~11.7~~ **12.09** MMBtu/hr, using no equipment as control, and exhausting to stack S1405, installed in 1940.

(h) Clark ~~1600~~ **2000** HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1408, with a maximum capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1408, installed in 1951.

(i) Clark ~~1600~~ **2000** HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1409, with a maximum capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1409, installed in 1951.

(j) Clark 2350 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1410, with a maximum capacity of ~~17.63~~ **18.8** MMBtu/hr, using no equipment as control, and exhausting to stack S1410, installed in 1951.

(n) Cooper-Bessemer 3400 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1414, with a maximum capacity of ~~23.46~~ **23.8** MMBtu/hr, using no equipment as control, and exhausting to stack S1414, installed in 1965.

(o) Dresser Rand 10,000 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1415, with a maximum capacity of ~~12~~ **72** MMBtu/hr, using no equipment as control, and exhausting to stack S1415, installed in 1971.

On page 6, Section A.4, Part 70 Permit Applicability, the following changes were made:

1.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This ~~stationary~~ **stationary** source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22)

On page 21, Section C.3, the following changes were made:

1. IDEM has revised condition C.3 Opacity to reflect current rule language. The condition has been changed to:

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

(a) ~~Visible emissions~~ **Opacity** shall not exceed an average of thirty percent (30%) ~~opacity~~ in ~~twenty-four (24) consecutive readings,~~ **any one (1) six (6) minute averaging period** as determined in 326 IAC 5-1-4.

(b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ 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.

On page 20, Section B.28, Part 70 Permit Applicability, the following changes were made:

1.

The IDEM now believes that this condition is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit.

~~B.**28**~~
~~Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~

~~Not withstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non-compliance.~~

On page 29, Section D.1, Facility Operation Conditions, the following changes were made:

(1) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1401, with a maximum capacity of ~~11.7~~ **12.09** MMBtu/hr, using no equipment as control, and exhausting to stack S1401, installed in 1937.

(2) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1402, with a maximum capacity of ~~11.7~~ **12.09** MMBtu/hr, using no equipment as control, and exhausting to stack S1402, installed in 1937.

(3) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1403, with a maximum capacity of ~~11.7~~ **12.09** MMBtu/hr, using no equipment as control, and exhausting to stack S1403, installed in 1937.

(4) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1404, with a maximum capacity of ~~11.7~~ **12.09** MMBtu/hr, using no equipment as control, and exhausting to stack S1404, installed in 1937.

(5) Worthington 1300 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1405, with a maximum capacity of ~~11.7~~ **12.09** MMBtu/hr, using no equipment as control, and exhausting to stack S1405, installed in 1940.

(8) Clark ~~1600~~ **2000** HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1408, with a maximum capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1408, installed in 1951.

(9) Clark ~~1600~~ **2000** HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1409, with a maximum capacity of 16 MMBtu/hr, using no equipment as control, and exhausting to stack S1409, installed in 1951.

(10) Clark 2350 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1410, with a maximum capacity of ~~17.63~~ **18.8** MMBtu/hr, using no equipment as control, and exhausting to stack S1410, installed in 1951.

(14) Cooper-Bessemer 3400 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1414, with a maximum capacity of ~~23.46~~ **23.8** MMBtu/hr, using no equipment as control, and exhausting to stack S1414, installed in 1965.

(15) Dresser Rand 10,000 HP Natural Gas Fired Reciprocating Internal Combustion Engine, identified as Emission Unit 1415, with a maximum capacity of ~~12~~ **72** MMBtu/hr, using no equipment as control, and exhausting to stack S1415, installed in 1971.

Emission Unit ID 1401 - 1405
Worthington Reciprocating
Internal Combustion Engine

Appendix A: Emission Calculations
Natural Gas Prime Movers - 4 Cycle Rich Burn Reciprocating Engine

Company Name: Panhandle Eastern Pipeline Company
Address City IN Zip: 9371 Zionsville Road, Indianapolis, IN 46268
CP:
Plt ID: T097-5937-00095
Reviewer: K. Leone
Date: 07/01/98

Heat Input Capacity MMBtu/hr: 12.09

Horsepower output: 1300.00

	Pollutant						
	PM	PM10	SO2	NOx	VOC	CO	HAP (Formaldehyde)
Emission Factor in lb/MMCF	10.0	10.0	0.6	---	---	---	
Emission Factor in lb/HP-hr	---	---	---	3.30E-02	6.60E-04	1.90E-02	2.20E-04
Potential Emission in tons/yr	0.5	0.5	0.0	187.9	3.8	108.2	1.3

Methodology

Emfacs in lb/MMCF from SCC# 2-02-002-02 Internal Combustion Engines - Natural Gas

Emfacs in lb/HP - hr based on manufacturer's specifications except for units 1401-1405 for CO based on AP-42, Table 3.2-1

Emfacs in lb/HP - hr based on GRI/Radian Study

Emission (tons/yr) = MMBtu/hr / 1000 * lbs/MMCF * 8760/2000

Emission (tons/yr) = HP-hr * lb/HP-hr * 8760/2000

Emission Unit ID 1406-1407
Clark Reciprocating
Int. Combustion Engine

Appendix A: Emission Calculations
Natural Gas Prime Movers - 2 Cycle Lean Burn Reciprocating Engine

Company Name: Panhandle Eastern Pipeline Company
Address City IN Zip: 9371 Zionsville Road, Indianapolis, IN 46268
CP:
Plt ID: T097-5937-00095
Reviewer: K. Leone
Date: 07/01/98

Heat Input Capacity MMBtu/hr: 16.00

Horsepower output: 1600.00

	Pollutant						
	PM	PM10	SO2	NOx	VOC	CO	HAP (Formaldehyde)
Emission Factor in lb/MMCF	10.0	10.0	0.6	---	---	---	
Emission Factor in lb/HP-hr	---	---	---	3.10E-02	5.50E-04	2.60E-03	3.96E-04
Potential Emission in tons/yr	0.7	0.7	0.0	217.2	3.9	18.2	2.8

Methodology

Emfacs in lb/MMCF from SCC# 2-02-002-02 Internal Combustion Engines - Natural Gas

Emfacs in lb/HP - hr based on manufacturer's specifications except for units 1401-1405 for CO based on AP-42, Table 3.2-1

Emfacs in lb/HP - hr based on GRI/Radian Study

Emission (tons/yr) = MMBtu/hr / 1000 * lbs/MMCF * 8760/2000

Emission (tons/yr) = HP-hr * lb/HP-hr * 8760/2000

Emission Unit ID 1408-1409
Clark Reciprocating
Int. Combustion Engine

Appendix A: Emission Calculations
Natural Gas Prime Movers - 2 Cycle Lean Burn Reciprocating Engine

Company Name: Panhandle Eastern Pipeline Company
Address City IN Zip: 9371 Zionsville Road, Indianapolis, IN 46268
CP:
Plt ID: T097-5937-00095
Reviewer: K. Leone
Date: 07/01/98

Heat Input Capacity MMBtu/hr	Horsepower output
16.00	2000.00

	Pollutant						
	PM	PM10	SO2	NOx	VOC	CO	HAP (Formaldehyde)
Emission Factor in lb/MMCF	10.0	10.0	0.6	---	---	---	
Emission Factor in lb/HP-hr	---	---	---	4.40E-02	1.50E-03	3.10E-03	3.96E-04
Potential Emission in tons/yr	0.7	0.7	0.0	385.4	13.1	27.2	3.5

Methodology

Emfacs in lb/MMCF from SCC# 2-02-002-02 Internal Combustion Engines - Natural Gas

Emfacs in lb/HP - hr based on manufacturer's specifications except for units 1401-1405 for CO based on AP-42, Table 3.2-1

Emfacs in lb/HP - hr based on GRI/Radian Study

Emission (tons/yr) = MMBtu/hr / 1000 * lbs/MMCF * 8760/2000

Emission (tons/yr) = HP-hr * lb/HP-hr * 8760/2000

Emission Unit ID 1410
Clark Reciprocating
Int. Combustion Engine

Appendix A: Emission Calculations
Natural Gas Prime Movers - 2 Cycle Lean Burn Reciprocating Engine

Company Name: Panhandle Eastern Pipeline Company
Address City IN Zip: 9371 Zionsville Road, Indianapolis, IN 46268
CP:
Plt ID: T097-5937-00095
Reviewer: K. Leone
Date: 07/01/98

Heat Input Capacity MMBtu/hr: 18.80

Horsepower output: 2350.00

	Pollutant						
	PM	PM10	SO2	NOx	VOC	CO	HAP (Formaldehyde)
Emission Factor in lb/MMCF	10.0	10.0	0.6	---	---	---	
Emission Factor in lb/HP-hr	---	---	---	3.30E-02	3.30E-03	2.60E-03	3.96E-04
Potential Emission in tons/yr	0.8	0.8	0.0	339.7	34.0	26.8	4.1

Methodology

Emfacs in lb/MMCF from SCC# 2-02-002-02 Internal Combustion Engines - Natural Gas

Emfacs in lb/HP - hr based on manufacturer's specifications except for units 1401-1405 for CO based on AP-42, Table 3.2-1

Emfacs in lb/HP - hr based on GRI/Radian Study

Emission (tons/yr) = MMBtu/hr / 1000 * lbs/MMCF * 8760/2000

Emission (tons/yr) = HP-hr * lb/HP-hr * 8760/2000

Emission Unit ID 1411-1413
Cooper - Bessemer Reciprocating Internal Combustion Engine

Appendix A: Emission Calculations
Natural Gas Prime Movers - 2 Cycle Lean Burn Reciprocating Engine

Company Name: Panhandle Eastern Pipeline Company
Address City IN Zip: 9371 Zionsville Road, Indianapolis, IN 46268
CP:
Plt ID: T097-5937-00095
Reviewer: K. Leone
Date: 07/01/98

Heat Input Capacity MMBtu/hr: 18.90

Horsepower output: 2700.00

	Pollutant						
	PM	PM10	SO2	NOx	VOC	CO	HAP (Formaldehyde)
Emission Factor in lb/MMCF	10.0	10.0	0.6	---	---	---	
Emission Factor in lb/HP-hr	---	---	---	3.30E-02	1.10E-03	2.20E-03	3.96E-04
Potential Emission in tons/yr	0.8	0.8	0.0	390.3	13.0	26.0	4.7

Methodology

Emfacs in lb/MMCF from SCC# 2-02-002-02 Internal Combustion Engines - Natural Gas

Emfacs in lb/HP - hr based on manufacturer's specifications except for units 1401-1405 for CO based on AP-42, Table 3.2-1

Emfacs in lb/HP - hr based on GRI/Radian Study

Emission (tons/yr) = MMBtu/hr / 1000 * lbs/MMCF * 8760/2000

Emission (tons/yr) = HP-hr * lb/HP-hr * 8760/2000

Emission Unit ID 1414
Cooper - Bessemer Reciprocating Internal Combustion Engine

Appendix A: Emission Calculations
Natural Gas Prime Movers - 2 Cycle Lean Burn Reciprocating Engine

Company Name: Panhandle Eastern Pipeline Company
Address City IN Zip: 9371 Zionsville Road, Indianapolis, IN 46268
CP:
Plt ID: T097-5937-00095
Reviewer: K. Leone
Date: 07/01/98

Heat Input Capacity MMBtu/hr: 23.80

Horsepower output: 3400.00

	Pollutant						
	PM	PM10	SO2	NOx	VOC	CO	HAP (Formaldehyde)
Emission Factor in lb/MMCF	10.0	10.0	0.6	---	---	---	
Emission Factor in lb/HP-hr	---	---	---	3.30E-02	1.10E-03	2.20E-03	3.96E-04
Potential Emission in tons/yr	1.0	1.0	0.1	491.4	16.4	32.8	5.9

Methodology

Emfacs in lb/MMCF from SCC# 2-02-002-02 Internal Combustion Engines - Natural Gas

Emfacs in lb/HP - hr based on manufacturer's specifications except for units 1401-1405 for CO based on AP-42, Table 3.2-1

Emfacs in lb/HP - hr based on GRI/Radian Study

Emission (tons/yr) = MMBtu/hr / 1000 * lbs/MMCF * 8760/2000

Emission (tons/yr) = HP-hr * lb/HP-hr * 8760/2000

Emission Unit ID 1415
Dresser Rand
Reciprocating Internal Combustion Engine

Appendix A: Emission Calculations
Natural Gas Prime Movers - 2 Cycle Lean Burn Reciprocating Engine

Company Name: Panhandle Eastern Pipeline Company
Address City IN Zip: 9371 Zionsville Road, Indianapolis, IN 46268
CP:
Plt ID: T097-5937-00095
Reviewer: K. Leone
Date: 07/01/98

Heat Input Capacity MMBtu/hr: 72.00

Horsepower output: 10000.00

	Pollutant						
	PM	PM10	SO2	NOx	VOC	CO	HAP (Formaldehyde)
Emission Factor in lb/MMCF	10.0	10.0	0.6	---	---	---	
Emission Factor in lb/HP-hr	---	---	---	3.10E-02	1.32E-03	5.50E-03	3.96E-04
Potential Emission in tons/yr	3.2	3.2	0.2	1357.8	57.8	240.9	17.3

Methodology

Emfacs in lb/MMCF from SCC# 2-02-002-02 Internal Combustion Engines - Natural Gas

Emfacs in lb/HP - hr based on manufacturer's specifications except for units 1401-1405 for CO based on AP-42, Table 3.2-1

Emfacs in lb/HP - hr based on GRI/Radian Study

Emission (tons/yr) = MMBtu/hr / 1000 * lbs/MMCF * 8760/2000

Emission (tons/yr) = HP-hr * lb/HP-hr * 8760/2000

Appendix A: Emissions Calculations
Total PTE - All Facilities

	PM	PM10	SO2	NOx	VOC	CO	HAP
Worthington Engine - Emission Unit ID 1401	0.5	0.5	0.0	187.9	3.8	108.2	1.3
Worthington Engine - Emission Unit ID 1402	0.5	0.5	0.0	187.9	3.8	108.2	1.3
Worthington Engine - Emission Unit ID 1403	0.5	0.5	0.0	187.9	3.8	108.2	1.3
Worthington Engine - Emission Unit ID 1404	0.5	0.5	0.0	187.9	3.8	108.2	1.3
Worthington Engine - Emission Unit ID 1405	0.5	0.5	0.0	187.9	3.8	108.2	1.3
Clark Engine - Emission Unit ID 1406	0.7	0.7	0.0	217.2	3.9	18.2	2.8
Clark Engine - Emission Unit ID 1407	0.7	0.7	0.0	217.2	3.9	18.2	2.8
Clark Engine - Emission Unit ID 1408	0.7	0.7	0.0	385.4	13.1	27.2	3.5
Clark Engine - Emission Unit ID 1409	0.7	0.7	0.0	385.4	13.1	27.2	3.5
Clark Engine - Emission Unit ID 1410	0.8	0.8	0.0	339.7	34.0	26.8	4.1
Cooper - Bessemer Engine - Emission Unit ID 1411	0.8	0.8	0.0	390.3	13.0	26.0	4.7
Cooper - Bessemer Engine - Emission Unit ID 1412	0.8	0.8	0.0	390.3	13.0	26.0	4.7
Cooper - Bessemer Engine - Emission Unit ID 1413	0.8	0.8	0.0	390.3	13.0	26.0	4.7
Cooper - Bessemer Engine - Emission Unit ID 1414	1.0	1.0	0.1	491.4	16.4	32.8	5.9
Dresser Rand Engine - Emission Unit ID 1415	3.2	3.2	0.2	1357.8	57.8	240.9	17.3
total	12.7	12.7	0.3	5504.5	200.2	1010.3	55.8

Fugitive Emissions not counted in Potential to Emit

Annual fugitive emission estimate from valves, seals, flanges on natural gas transmission system: 0.5 tons per year

* Sources calculations of Fugitive emissions were used.