

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES
MANAGEMENT DIVISION**

**Citizen's Gas and Coke Utility
(LNG South)
3565 Big Four Road
Beech Grove, Indiana 46203**

Citizen's Gas and Coke Utility 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.: T097-6498-00287	
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 liquified natural gas storage facility under a Standard Industrial Classification Code (SIC) of 4922 (establishments engaged in the transmission and/or storage of natural gas for sale).

Responsible Official: Lindsay Lindgren
Source Address: 3565 Big Four Road, Beech Grove, Indiana 46203
Mailing Address: 2020 North Meridian Street, Indianapolis, Indiana 46202
SIC Code: 4922
County Location: Marion
County Status: Nonattainment Area for Particulate Matter (PM) and Lead (Pb)
Attainment for all other Criteria pollutants
Source Status: Part 70 Permit Program
Major Source under PSD

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) One (1) Clark two cycle lean burn natural gas fired reciprocating internal combustion compressor engine identified as Emission Unit ID01. Model number TCVA10. Maximum heat input rated at 33.36 million Btu per hour. Rated horsepower output of 3520 HP. Exhausting at Stack/Vent ID S01. Installation date of 1971.
- (b) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor A. Model number SUB-X 48-60. Maximum heat input rated at 43.5 million Btu per hour. Exhausting at Stack/Vent ID S02. Installation date of 1971.
- (c) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor B. Model number SUB-X 48-60. Maximum heat input rated at 43.5 million Btu per hour. Exhausting at Stack/Vent ID S03. Installation date of 1971.
- (d) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor C. Model number SUB-X 48-60. Maximum heat input rated at 43.5 million Btu per hour. Exhausting at Stack/Vent ID S04. Installation date of 1971.
- (e) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor D. Model number SUB-X 48-60. Maximum heat input rated at 43.5 million Btu per hour. Exhausting at Stack/Vent ID S05. Installation date of 1989.

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

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

- (a) One (1) pentane storage tank at 17,560 gallon storage capacity identified as Emission Unit ID Pentane Storage Tank and subject to the New Source Performance Standard for Volatile Organic Compound Liquid Storage Vessels for which Construction, Reconstruction or Modification Commenced after July 23, 1984 (40 CFR Part 60.110b Subpart Kb). Installation date of April 1986.

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in the Section B condition entitled "Permit Shield."

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, Code of Indianapolis and Marion County Section 4-11, 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 4-50.

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, Permits
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 and IAPCB Reg. 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to the 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 based on continuous or intermittent data;
 - (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 after issuance of this permit, including the following information on each:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated 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.13 - 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, Permits
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, Permits
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, Permits
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, and 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 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, 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, or in a time period consistent with the fee schedule established in 326 IAC 2-7-19 and Chapter 511 of the Code of Indianapolis and Marion County. 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. The applicable fee is due April 1 of each year.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 and IAPCB Reg. 2-1-1 are satisfied by this permit for any previously unpermitted facilities as listed in Sections A.2 and A.3 after the date of issuance of this permit.

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 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source for Oxides of Nitrogen (NO_x).

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

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 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 511, 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. 6-4-1]

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 are 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 unit(s) vented to the control equipment is (are) in operation.

C.8 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
Air Quality Management Section, Asbestos
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.9 Performance Testing [326 IAC 3-6]

-
- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing 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.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

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

C.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 after receipt of this permit. If due to circumstances beyond its control, the Permittee may extend compliance schedule and 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 shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval 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 ninety (90) days after the date of issuance of this permit.

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

(c) 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.

(d) 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.

(e) 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.

- (f) 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 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-6][326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

- (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 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.9 - 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.17 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 15 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:

Indiana Department of Environmental Management
Technical Support and Modeling 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) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.

C.18 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.8-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.19 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)][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 verbal request of an IDEM, OAM, and 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 and/or ERMD makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and 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 analyzes were performed;
 - (3) The company or entity performing the analyzes;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyzes; 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.15 - 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.20 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 Semi-Annual 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 semi-annual 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.16 - Deviations from Permit 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.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Emission Unit ID 01 Clark Compressor Engine	Facility Description [326 IAC 2-7-5(15)] One (1) Clark two cycle lean burn natural gas fired reciprocating internal combustion compressor engine identified as Emission Unit ID01. Model number TCVA10. Maximum heat input rated at 33.36 million Btu per hour. Rated horsepower output of 3520 HP. Exhausting at Stack/Vent ID S01. Installation date of 1971.
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SECTION D.2 FACILITY OPERATION CONDITIONS

Emission Unit ID Vapor A Trane Vaporizer	Facility Description [326 IAC 2-7-5(15)] One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor A. Model number SUB-X 48-60. Maximum heat input rated at 43.5 million Btu per hour. Exhausting at Stack/Vent ID S02. Installation date of 1971.
Emission Unit ID Vapor B Trane Vaporizer	Facility Description [326 IAC 2-7-5(15)] One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor B. Model number SUB-X 48-60. Maximum heat input rated at 43.5 million Btu per hour. Exhausting at Stack/Vent ID S03. Installation date of 1971.
Emission Unit ID Vapor C Trane Vaporizer	Facility Description [326 IAC 2-7-5(15)] One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor C. Model number SUB-X 48-60. Maximum heat input rated at 43.5 million Btu per hour. Exhausting at Stack/Vent ID S04. Installation date of 1971.
Emission Unit ID Vapor D Trane Vaporizer	Facility Description [326 IAC 2-7-5(15)] One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor D. Model number SUB-X 48-60. Maximum heat input rated at 43.5 million Btu per hour. Exhausting at Stack/Vent ID S05. Installation date of 1989.

SECTION D.3

FACILITY OPERATION CONDITIONS

Insignificant Activities

Emission Unit ID	Facility Description [326 IAC 2-7-5(15)]	One (1) pentane storage tank at 17,560 gallon storage capacity identified as Emission Unit ID Pentane Storage Tank.
Pentane Storage Tank	Installation date of April 1986.	

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

D.3.1 Record Keeping Requirement

Pursuant to the New Source Performance Standard 40 CFR Part 60.116b Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction or Modification Commenced after July 23, 1984, the Permittee shall keep readily accessible records showing the dimension or tank capacity of Emission Unit ID Pentane Storage Tank. This record shall be kept for the life of the source.

**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: Citizen's Gas and Coke Utility (LNG South)
Source Address: 3565 Big Four Road, Beech Grove, Indiana 46203
Mailing Address: 2020 North Meridian Street, Indianapolis, Indiana 46202
Part 70 Permit No.: T097-6498-00287

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: Citizen's Gas and Coke Utility (LNG South)
Source Address: 3565 Big Four Road, Beech Grove, Indiana 46203
Mailing Address: 2020 North Meridian Street, Indianapolis, Indiana 46202
Part 70 Permit No.: T097-6498-00287

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
<input type="checkbox"/> 1. This is an emergency as defined in 326 IAC 2-7-1(12) <input type="checkbox"/> The Permittee must notify the ERMD and OAM, within four (4) business hours; and <input type="checkbox"/> 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
<input type="checkbox"/> 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) <input type="checkbox"/> The Permittee must submit notice in writing within ten (10) calendar days

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

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

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

Page 2 of 2

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

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

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

**PART 70 OPERATING PERMIT
 SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Citizen's Gas and Coke Utility (LNG South)
 Source Address: 3565 Big Four Road, Beech Grove, Indiana 46203
 Mailing Address: 2020 North Meridian Street, Indianapolis, Indiana 46202
 Part 70 Permit No.: T097-6498-00287

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

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations in this reporting period."

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations

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

Attach a signed certification to complete this report.

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 (l), 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
and Enhanced New Source Review

Source Background and Description

Source Name: Citizen's Gas and Coke Utility - LNG South
Source Location: 3565 Big Four Road, Beech Grove, Indiana 46203
County: Marion
SIC Code: 4922
Operation Permit No.: T097-6498-00287
Permit Reviewer: M. Caraher

The Environmental Resources Management Division (ERMD) has reviewed a Part 70 permit application received from Citizen's Gas and Coke Utility on September 4, 1996 relating to the operation of a liquefied natural gas storage facility under a Standard Industrial Classification Code (SIC) number of 4922 (Establishments engaged in the transmission and/or storage of natural gas for sale).

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

The source also consists of the following unpermitted facilities/units:

- (1) One (1) Clark two cycle lean burn natural gas fired reciprocating internal combustion compressor engine identified as Emission Unit ID01. Model number TCVA10. Maximum heat input rated at 33.36 million Btu per hour. Rated horsepower output of 3520 HP. Exhausting at Stack/Vent ID S01. Installation date of 1971.
- (2) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor A. Model number SUB-X 48-60. Maximum heat input rated at 43.5 million Btu per hour. Exhausting at Stack/Vent ID S02. Installation date of 1971.
- (3) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor B. Model number SUB-X 48-60. Maximum heat input rated at 43.5 million Btu per hour. Exhausting at Stack/Vent ID S03. Installation date of 1971.
- (4) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor C. Model number SUB-X 48-60. Maximum heat input rated at 43.5 million Btu per hour. Exhausting at Stack/Vent ID S04. Installation date of 1971.
- (5) One (1) Trane Thermal natural gas fired Vaporizer identified as Emission Unit ID Vapor D. Model number SUB-X 48-60. Maximum heat input rated at 43.5 million Btu per hour. Exhausting at Stack/Vent ID S05. Installation date of 1989.

New Emission Units and Pollution Control Equipment Requiring ENSR

This existing source, as of 1971, appears to have commenced initial operation prior to 326 IAC 2-2 (PSD) or 326 IAC 2-3 (Emission Offsets) rule applicability. All initially installed significant emission units have not undergone any modification that would have increased potential emissions. For the basis of this review, Emission Unit ID Vapor D, the Trane Vaporizer installed in 1989, appears to have potential NO_x emissions of less than 25 tons per year (see TSD Appendix A page 2 of 6) and regulated pollutant emissions are less than any major modification threshold. However, the addition does have potential NO_x emissions of greater than 5 pounds per hour or 25 pounds per day qualifying at a registration level. Emission Unit ID Vapor D, as well as existing fuel combustion equipment in all significant emission units, involves natural gas combustion and does not appear to have an applicable PM or SO₂ limit.

An electric powered emergency fire pump was installed in 1991 and is rated at 4.0 million Btu or 1572 horsepower. The emergency fire pump internal combustion engine also has diesel fuel as backup fuel firing. Form GSD 10a lists stationary fire pumps as an Insignificant Activity. Therefore, emissions are not expected to exceed 326 IAC 2-1 or 326 IAC 2-7 minimum permitting or registration levels.

As a result, the entire source appears to require only the need for a permit under 326 IAC 2-1(State Construction and Operating Permits), 326 IAC 2-1-3.2 (State Construction and Operating Permits: Enhanced New Source Review) and 326 IAC 2-7 (Part 70 Permit Program) and elects to obtain a permit under 326 IAC 2-7. This review and Part 70 Permit issuance is intended to satisfy the Construction Permit requirement(s) under 326 IAC 2-1 and 326 IAC 2-7.

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:
 - (a) Emission Unit ID SBR-1, Salt Bath Regeneration System. Natural gas fired at 4.0 million Btu per hour. Installed in 1971.
- (2) Closed loop heating and cooling systems.
- (3) Heat exchanger cleaning and repair.
- (4) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (5) Equipment used to collect any material that might be released during a malfunction, process upset or spill cleanup including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (6) On site fire and emergency response training approved by the department.
- (7) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower:
 - (a) Emission Unit ID WEG 1, Waukesha Emergency Generator. Natural gas fired at 4.3 million Btu per hour or an equivalent horsepower rating of 1676 at 1250 kilowatts. Installed in 1971.
- (8) Stationary fire pumps:
 - (a) Emission Unit ID EFP 1. Electric powered with diesel fuel backup at 4.0 million Btu per hour. Installed in 1991.

- (9) Purge double block and bleed valves.
- (10) One (1) pentane storage tank at 17,560 gallon storage capacity identified as Emission Unit ID Pentane Storage Tank and subject to the New Source Performance Standard for Volatile Organic Compound Liquid Storage Vessels for which Construction, Reconstruction or Modification Commenced after July 23, 1984 (40 CFR Part 60.110b Subpart Kb). Installation date of April 1986.
- (11) Two (2) butane storage tanks each at 1,750 gallon storage capacity.

Existing Approvals

The source has not been operating under any previous approvals which includes, but is not limited to, the following: permits, registrations, modifications, exemptions, etc..

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and/or operated without receipt of the proper permit. The subject equipment is listed in this Technical Support Document under **Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR**.
- (b) IDEM and ERMD is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.
- (c) The source has 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 incomplete Part 70 permit application for the purposes of this review was received on September 4, 1996. Additional information was received on December 13, 1996 and on May 21, 1998 and makes the Part 70 permit application administratively complete.

The Part 70 permit application was designated administratively complete, by default, on November 4, 1996.

Emission Calculations

For the basis of this review and determination, the NO_x, VOC and CO emission factors utilized for the Clark Engine, Emission Unit ID 01, are from AP-42 Table 3.2-2 for Uncontrolled Natural Gas Prime Movers. PM/PM10 and SO₂ emission factors are from SCC # 2-02-002-02 Reciprocating Internal Combustion Engines as no current AP-42 emission factors for PM/PM10 and SO₂ exist.

The Trane natural gas fired Vaporizers (Emission Unit ID's Vapor A, B, C and D) provide process heat to vaporize liquified natural gas on demand. For the basis of this review and determination, these Emission Units are not indirect heating facilities. However, the seemingly most accurate emission estimation method for natural gas combustion, given the Emission Unit descriptions, is to apply AP-42 Table 1.4-1 and Table 1.4-2 emission factors for PM/PM10, SO₂, VOC and CO. The manufacturer of the Vaporizers, per the application submitted by Citizen's Gas and Coke Utility, have supplied the NO_x emission factor.

Citizen's Gas and Coke Utility provided a fugitive emissions estimate of pentane losses from the liquefaction refrigeration process. These emission losses are expected to be from valves, flanges and seals in the refrigeration system. Annual pentane makeup, as reported, is, approximately, 3500 gallons per year or 9.2 tons per year.

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

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	12.2
PM-10	12.2
SO ₂	3.4
VOC	17.1
CO	80.8
NO _x	460.8

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

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of Nitrogen Oxides (NO_x) 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) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table lists the actual emissions from the source. This information reflects the emission totals stated on application Form GSD-07 received September 4, 1996.

Pollutant	Actual Emissions (tons/year)
PM	0.004
PM-10	0.004
SO ₂	0.0
VOC	1.16
CO	4.06
NO _x	29.41
HAP (specify)	NA

No previous emission data has been received from the source.

Limited Potential to Emit

PTE is not being limited per this Part 70 Permit. Therefore, the Limited PTE Table does not appear because:

- (a) the Permit does not contain limitations from previous permits;
 - (b) there are no emission limitations and standards in this Permit;
- and,
- (c) there are no limitations from rule applicability.

County Attainment Status

The source is located in Marion County.

Pollutant	Status (attainment or unclassifiable; severe, moderate, marginal, or maintenance nonattainment)
PM-10	unclassifiable
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	nonattainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) 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) The pentane storage tank, an Insignificant Activity, is subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction or Modification Commenced after July 23, 1984), due to the tank being installed in April 1986, the tank stores a volatile organic liquid, pentane, and the tank liquid storage capacity, 17,560 gallons, is in excess of 40 m³ (approximately, 10,000 gallons) but is less than 75 m³ storage capacity.

Because the storage tank is less than 75 m³ storage capacity, 40 CFR Part 60.110b(b) exempts the notification requirements of 40 CFR Part 60 Subpart A (New Source Performance Standards - General Provisions). The only applicable provision(s) of Subpart Kb appears to be 40 CFR 60.116b which requires:

The owner or operator of each storage vessel shall keep readily accessible records showing the dimension of the storage vessel. This record shall be kept for the life of the source.

Citizen's Gas and Coke Utility reported the installation date and tank liquid storage capacity on December 13, 1996 in response to an ERMD Request for Additional Information (RAI).

As a result, the source appears to be in compliance with the provisions of 40 CFR Part 60 Subpart Kb.

Citizen's Gas and Coke Utility provided a fugitive emissions estimate of pentane losses from the liquefaction refrigeration process. These emission losses are expected to be from valves, flanges and seals in the refrigeration system and not from tank turnovers or breathing and working losses. Actual annual pentane makeup is, approximately, 3500 gallons per year or 9.2 tons per year. These fugitive emissions are not counted in the overall source wide potential to emit.

- (b) 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.
- (c) The main compressor at this source, the Clark Engine Emission Unit ID 01, is a two cycle lean burn natural gas fired reciprocating engine and was installed in 1971. The New Source Performance Standard for Stationary Gas Turbines (40 CFR 60.330 Subpart GG) does not apply to this source because it is not a gas turbine engine.
- (d) 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 any regulated pollutant (NO_x) exceed 100 tons per year. A submitted ERP would fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 1-6 Malfunctions, 326 IAC 2-7-16 Part 70 Permits: Emergency as an Affirmative Defense and 326 IAC 2-7-5 Permit Content

The source is initially subject to 326 IAC 1-6 because it is required to obtain a permit under 326 IAC 2 (Permit Review Rules). However, 326 IAC 1-6 emergency or upset provisions are superseded by 326 IAC 2-7-16 which requires the source to report verbally within four (4) business hours any emergency which results in an increase of an emission limitation or violation of an applicable rule. A written excess emissions report is required to be submitted within two (2) working days of any such occurrence. Pursuant to 326 IAC 2-7-5 Permit Content, records of all such occurrences are to be retained at the source for a period of five (5) years from the date of such occurrence(s) and shall be made available to IDEM, OAM and/or ERMD upon request.

326 IAC 1-6-3 Malfunctions: Preventive Maintenance (PM) Plans and 326 IAC 2-7-4 Part 70 Permits: Application

The source is initially subject to 326 IAC 1-6-3 because it is required to obtain a permit under 326 IAC 2 (Permit Review Rules). However, 326 IAC 1-6-3 is superseded by 326 IAC 2-7-4 which requires the source to comply with the provisions of 326 IAC 1-6-3. Any person responsible for operating any facility specified in 326 IAC 1-6 shall prepare and maintain a Preventive Maintenance Plan which includes the following information:

- 1) Identification of the individual(s) responsible for inspecting, maintaining and repairing emission control device(s).
- 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 which will be kept in inventory and made available for quick replacement.

PM Plans shall be submitted to IDEM,OAM and/or ERMD upon request and shall be subject to review and approval by IDEM,OAM and/or ERMD.

326 IAC 1-7 Stack Height Provisions

This source does not appear to have potential or actual PM or SO₂ emissions greater than 25 tons per year. Therefore, the source, otherwise subject to 326 IAC 1-7 (Stack Height Provisions), is specifically exempted from GEP Stack height requirements of 326 IAC 1-7 (Stack Height Provisions).

326 IAC 2-1 State Construction and Operating Permits; Rule Applicability

The source is required, by 326 IAC 2-1, to obtain an operating permit for all significant emission units listed on Form GSD-06 because potential NO_x emissions from the Clark Engine, Emission Unit ID 01 exceed 25 tons per and each of the four (4) Trane Vaporizers exceed registration level. Because PTE, prior to the issuance of a Part 70 Permit, exceeds 100 tons per year of NO_x, the source is electing to obtain a Part 70 Permit under 326 IAC 2-7 Part 70 Permit Program.

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

The source began operation in 1971. No modifications to existing facilities that would increase PTE have been made. At the time of the addition of Emission Unit ID Vapor D, the source would have been major for NO_x. However, the additional NO_x emissions are less than the major modification threshold for NO_x. In 1989, Marion County had been designated nonattainment for ozone. As of the date of this TSD, Marion County is now classified as attainment for ozone. 326 IAC 2-2 does not apply to this source because it began operation prior to 326 IAC 2-2 rule applicability and the only addition made was less than any major modification threshold.

326 IAC 2-3 Emission Offset

The source began operation in 1971. No modifications to existing facilities that would increase PTE have been made. At the time of the addition of Emission Unit ID Vapor D, the source would have been major for NO_x. However, the additional NO_x emissions are less than the major modification threshold for NO_x. In 1989, Marion County had been designated nonattainment for ozone. As of the date of this TSD, Marion County is now classified as attainment for ozone. 326 IAC 2-3 does not apply to this source because it began operation prior to 326 IAC 2-3 rule applicability and the only addition made was less than any major modification threshold.

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 ten (10) tons per year of NO_x and/or VOC in Marion County. The annual statement must be received by April 15 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 2-7 Part 70 Permit Program

The source is required, by 326 IAC 2-1, to obtain an operating permit for all emission units listed on Form GSD-06 except those listed as an Insignificant Activity (see TSD **Insignificant Activities**) because potential NO_x emissions from the source exceed 100 tons per year. Because PTE, prior to the issuance of a Part 70 Permit, exceeds 100 tons per year of NO_x, the source is electing to obtain a Part 70 Permit under 326 IAC 2-7 Part 70 Permit Program.

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 thirty percent (30%) 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 Nonattainment Area 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. 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. A gaseous fuel is consumed and does not appear to have appreciable SO₂ emissions. Potential SO₂ emissions appear to be lower than the applicability threshold (25 tons per year) of 326 IAC 7. There appears to be no reciprocating engine rules. As a result, there appears to be no applicable SO₂ emission limit.

326 IAC 8-1-6

New facilities as of January 1, 1980, which have potential emissions of 25 tons per year or more and which are not otherwise regulated by other provisions of 326 IAC 8, shall reduce emissions using Best Available Control Technology (BACT). The use of pentane (a VOC) in the refrigeration system since 1986 has potential fugitive emissions losses from valves, seals and flanges. 326 IAC 8-1-6 does not appear to exempt fugitive emissions losses. However, the source claims a potential emission loss of 9.2 tons per year. As a result, 326 IAC 8-1-6 does not appear to be applicable.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration.

When this occurs IDEM, OAM and ERMD, in conjunction with the source, must develop specific

conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The compliance monitoring requirements applicable to this source are as follows:

Daily visible emissions notations of each Emission Unit stack exhaust shall be performed during normal daylight operations when in operation and venting directly to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

These monitoring conditions are necessary to ensure proper operation and maintenance is ongoing in order to ensure compliance with and opacity standards (326 IAC 5-1).

There appears to be no additional applicable compliance monitoring provisions for significant emission units at this source because the source is subject to no federal, state or local rules other than the need for a Part 70 Permit under 326 IAC 2-7 and opacity under 326 IAC 5-1. Potential to Emit is not being limited to stay below any threshold such as 326 IAC 2-2 (PSD), 326 IAC 2-3 (Emissions Offsets) or under any applicable federal, state or local rule.

The source does not appear to be an affected source, pursuant to 40 CFR Part 64.2 Compliance Assurance Monitoring (CAM), because the source does not trigger the applicability criteria for all three (3) provisions of CAM applicability:

- 1) Is a major source;
- 2) has an applicable requirement; and
- 3) has a control device in place or is required to have control.

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.

None of the listed air toxics will be emitted from this source.

Conclusion

The operation of this liquified natural gas storage facility shall be subject to the conditions of the attached proposed Part 70 Permit No. T097-6498-00287.

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

Addendum to the
Technical Support Document for a Part 70 Operating Permit and Enhanced New Source
Review (ENSR)

Source Name: Citizen's Gas and Coke Utility (LNG South Plant)
Source Location: 3565 Big Four Road, Beech Grove, Indiana 46203
County: Marion
SIC Code: 4922
Operation Permit No.: T097-6498-00287
Permit Reviewer: M. Caraher

On August 19, 1998, the Office of Air Management (OAM) and the City of Indianapolis Environmental Resources Management Division (ERMD) had a notice published in the Indianapolis Star Newspaper in Indianapolis, Indiana, stating that Citizen's Gas and Coke Utility had applied for a Part 70 Operating Permit to operate a liquefied natural gas storage facility under a Standard Industrial Classification Code number of 4922 (establishments engaged in the transmission and/or storage of natural gas for sale). The notice also stated that OAM and ERMD 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.

ERMD received written comments from three (3) IDEM, OAM staff personnel during the required thirty (30) day public notice period and received verbal comments from Citizen's Gas and Coke Utility (CG & CU) prior to commencement of the public notice period. ERMD also received comments from IDEM on December 4, 1998 that the Title V Model Permit has been revised and permits not issued by that date should incorporate these revisions.

Upon further review, the OAM and ERMD has decided to make the following revisions to the Permit (the Table Of Contents has been modified to reflect these changes) and the Technical Support Document:

Title V Permit - Section A changes:

Comment #1: CG&CU requested that the Responsible Official in Section A.1 be changed to Lindsay Lindgren and the zip code of the plant site be changed to 46107.

Response: Requested name change for the Responsible Official was made. However, the zip code of the plant site appears to be 46203.

Comment #2: CG&CU requested to know why the butane storage tanks were left out of Section A.3 Specifically Regulated Insignificant Activities.

Response: Each butane storage tank was reported to be 1750 gallon storage capacity. As a result, each tank is below the applicable storage capacity threshold as listed in the New Source Performance Standard for Volatile Organic Compound Liquid Storage Vessels for which Construction, Reconstruction or Modification Commenced after July 23, 1984 (40 CFR Part

60.110b Subpart Kb). The butane storage tanks are not listed in the Permit because there appear to be no specific applicable emission limits or compliance monitoring requirements for this Insignificant Activity. However, the butane storage tanks are listed as an Insignificant Activity in the Technical Support Document (TSD).

Title V Permit - Section B changes:

Comment # 3: CG&CU asked if the Section B.5 requirement to submit a Title V Permit renewal application at least nine (9) months prior to expiration could be changed to a shorter time frame.

Response: 326 IAC 2-7-4(a)(1)(D) specifically states, "For purposes of a Part 70 Permit renewal, a timely application is one that is submitted at least nine (9) months prior to the date of expiration of the source's existing Permit." No changes.

Comment # 4: Under Section B.26 Annual Fee Payment, the source is and will be required to pay an annual fee for this source. CG&CU specifically asked if all three Marion County Citizen's Gas & Coke Utility plants (two Title V sources and one FESOP source) could consolidate each source's annual fee payment under one bill.

Response: Pursuant to 326 IAC 2-6 Emission Reporting and Section C.17 of this Permit, an Annual Emission Statement is required to be submitted by April 15 of each year for each source with potential NO_x or VOC emissions in excess of ten (10) tons per year. Title V fees will be based upon a base fee and actual tons emitted by the source. If the source wishes to pay an annual fee with one payment for all sources, they can but the fee paid for each source should be specifically stated for each source in the fee payment received by IDEM, OAM and ERMD.

Comment # 5: IDEM revised the Title V model permit on December 4, 1998. All Title V Permits should include these revisions. Condition B.28 Credible Evidence should be deleted from the proposed Title V Permit.

Response: ERMD has deleted Condition B.28 Credible Evidence from the Permit. IDEM and ERMD now believe 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.

Title V Permit - Section C changes:

Comment # 6: IDEM revised the Title V model permit on December 4, 1998. All Title V Permits should include these revisions. Condition C.3 Opacity has been revised to state "opacity" where "visible emissions" had previously been stated. In addition, 40 CFR 60, Appendix A, Method 9 has been added to Condition C.3(b).

Response: ERMD has revised Condition C.3 Opacity to reflect the changes made by IDEM to the Title V model permit. The new Condition C.3 Opacity now states:

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

Title V Permit - Section D.1 changes:

Comment # 7: ERMD received three (3) comments from IDEM,OAM that daily visible emissions notations previously required by Section D.1.1 be removed from the draft Permit. The first IDEM, OAM comment stated daily VE notations should not be required for facilities that burn only natural gas. The second and third IDEM,OAM comment stated that the use of compliance monitoring-daily VE notations-is for use as an indicator of compliance with an applicable emissions limitation. Because there appears to be no applicable Particulate Matter emissions limitation for this facility, there appears to be no reason to conduct compliance monitoring.

Response: Daily visible emissions notations previously required by Section D.1.1 have been removed from the draft Permit. As a result, Section D.1.2 General Record Keeping Requirements and Section D.1.3 General Reporting Requirements appear to be no longer applicable and have also been removed from the draft Permit. These Sections had been in the Permit to keep a log of VE notations and to report deviations, if any.

Title V Permit - Section D.2 changes:

Comment # 8: ERMD received three (3) comments from IDEM,OAM that daily visible emissions notations previously required by Section D.2.1 be removed from the draft Permit. The first IDEM, OAM comment stated daily VE notations should not be required for facilities that burn only natural gas. The second and third IDEM,OAM comment stated that the use of compliance monitoring-daily VE notations-is for use as an indicator of compliance with an applicable emissions limitation. Because there appears to be no applicable Particulate Matter emissions limitation for this facility, there appears to be no reason to conduct compliance monitoring.

Response: Daily visible emissions notations previously required by Section D.2.1 have been removed from the draft Permit. As a result, Section D.2.2 General Record Keeping Requirements and Section D.2.3 General Reporting Requirements appear to be no longer applicable and have also been removed from the draft Permit. These Sections had been in the Permit to keep a log of VE notations and to report deviations, if any.

Title V Permit - Reporting Form changes:

Pursuant to 326 IAC 2-7-5(3)(C) and Section C.20 General Reporting Requirements of the draft Permit, a compliance monitoring report is required to be submitted no less than every six (6) months. The public notice draft version of the Permit contained a quarterly reporting requirement in Section C.20 and a Quarterly Compliance Monitoring Form.

Since daily VE notations have been removed from the Permit and there are no compliance monitoring requirements in any Section D of the Permit, a quarterly report would serve little purpose. However, the source is required, pursuant to 326 IAC 2-7-5(3), to submit monitoring and related record keeping and reporting requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements. Pursuant to 326 IAC 2-7-5(3), at a minimum, a semi-annual compliance monitoring report shall be included in all Title V Permits. IDEM, OAM has stated that a Compliance Monitoring Report Form is mandatory and that only the reporting frequency can be changed.

As a result, the reporting form on page 36 of 38 has been changed to Semi-Annual Compliance Monitoring Report Form and Section C.20(a) General Reporting Requirements has been changed to state, "To affirm that the source has met all the compliance monitoring requirements stated in this Permit, the source shall submit a Semi-Annual Compliance Monitoring Report."

Comment # 9: IDEM commented that there should be a natural gas fired certification submitted at least semi-annually to verify that only natural gas is the fuel combusted by significant emission units at the source.

Response: IDEM guidance on this issue includes the February 17, 1997 IDEM memo on natural gas visible emissions evaluations for dual fuel fired and alternate fuel firing capabilities for boilers mainly fired with natural gas. From this memo, a Natural Gas Fired Boiler Certification Form was compiled and has been included in the Title V model permit as model language, if applicable. IDEM guidance on this issue indicates that certifying that natural gas was the only fuel fired in an Emission Unit is applicable for units that are dual fired or have alternate fuel firing capabilities. If an emission unit can burn only natural gas then it would serve no purpose to semi-annually or quarterly report that natural gas was being fired in an emissions unit. No changes.

Technical Support Document (TSD) changes - Air Toxic Emissions:

There are no changes to the TSD section **Air Toxic Emissions**. However, a more elaborate discussion of potential HAP emissions should have been stated in the public notice version of the Technical Support Document. Summary discussion of possible potential HAP emission topics are as follows:

- (a) Pentane is not on the list of 187 hazardous air pollutants. Therefore, pentane is not a HAP and fugitive pentane emissions are not counted towards source wide potential to emit HAP.
- (b) AP-42 does not list HAP emissions for natural gas combustion emission factors as found in AP-42 Chapter 1.4 Natural Gas Combustion. AP-42 Chapter 1.4 emission factors were utilized for Emission Unit ID Vapor A, B, C and D.
- (c) The Clark Compressor Engine Emission Unit ID 01 is a 2 cycle lean burn natural gas fired reciprocating engine. AP-42 Table 3.2-2 Criteria Emission Factors for Uncontrolled Natural Gas Prime Movers lists a total nonmethane organic compound (TNMOC or VOC) emission factor of 9.48E-04 lb/hp-hr. Potential to Emit VOC for this Emission Unit was established using this emission factor with an emission factor rating of A. AP-42 Table 3.2-3 lists formaldehyde emissions, a VOC and a compound on the list of 187 HAPs, with an emission factor of 2.93E-03 lb/hp-hr which is higher than the TNMOC emission factor. AP-42 Table 3.2-3 has an emission factor rating of E and states, "ratings reflect very limited data and may not apply to specific facilities." As a result, possible potential to emit formaldehyde was not calculated for this Emission Unit ID.

- (d) The source does not have a glycol dehydration operation or unit at this site. The February 6, 1998 Federal Register Notice entitled "National Emission Standards for Hazardous Air Pollutants: Oil and Natural Gas Production and Natural Gas Transmission and Storage; Proposed Rule," identified glycol dehydration units as the primary emission point for HAP (specifically, ethylidene dichloride) at natural gas transmission and storage facilities. In the dehydration process, natural gas is contacted with glycol to remove water present in the natural gas and the process can be performed and/or repeated at any point in the distribution of natural gas from the well head to the end user.
- (e) The source stated on GSD Form 08 (Source HAP Pollutant Summary) submitted with the initial Title V application received September 4, 1996 that, "no HAPs expected."

Technical Support Document (TSD) changes - Appendix A page 6 of 6:

Comment # 10: CG&CU stated that TSD Appendix A page 6 of 6 lists actual reported pentane losses of 3500 gallons for 1996. CG&CU would like to state that 1200 gallons is actual reported pentane loss for calendar year 1997.

Response: Calendar years 1996 and 1997 fugitive pentane losses are now both stated on TSD Appendix A page 6 of 6.

APPENDIX A

**Emergency Fire Pump
Electric but with diesel
fuel as backup
Emission Unit ID EFP 1**

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Internal Combustion Engines - Industrial Reciprocating
> 447 kw
Citizen's Gas & Coke Utility - LNG South
3565 Big Four Road, Beech Grove, IN 46203

T097-6498-00287
M. Caraher
05/26/98**

maximum
heat input
MMBtu / hr
4.0

equivalent
kilowatt hr
1173.0

fuel S = 0.4 percent by weight

equivalent
horsepower
1573

	PM	PM10	SOx	NOx	VOC	CO
Emission Factor lbs / MMBtu grams / kw hr	0.1 ---	0.1 ---	--- 4.92(S)	--- 14.0	--- 0.4	--- 3.2
Potential Emissions lbs / hr	0.3	0.2	5.1	36.2	1.0	8.3
tons / yr @ 500 hrs / yr	0.1	0.1	1.3	9.0	0.3	2.1

Methodology

AP-42 Appendix A Conversion Factor: 1 kilowatt hour = 3410 Btu
AP-42 Appendix A Conversion Factor: 1 horsepower = 2.5435E03 Btu

Equivalent kw hr rating: (max heat input MMBtu / hr) / (3410 Btu / kw hr)

Equivalent Horsepower: million Btu / 2.5435E03

Emission Factor (lbs / MMBtu): from AP-42 Table 3.4-5 PM Emission Factors for Large Uncontrolled Stationary Diesel Engines

Emission Factor (grams / kw hr): from AP-42 Table 3.4-1 Gaseous Emission Factors for Large Uncontrolled Stationary Diesel Engines

Potential Emissions (lbs / hr): emfac x heat input or kw hr output

Potential Emissions (tons / yr): lbs / hr emissions x 500 operating hrs / yr x ton / 2000 lbs

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

Emission Unit ID's
Vapor A
Vapor B
Vapor C
Vapor D
 each @ 43.5 MMBtu/hr

Vaporizer Heating Units
Company Name: Citizen's Gas & Coke Utility - LNG South
Address City IN Zip: 3565 Big Four Road, Beech Grove, IN 46203
CP:
Plt ID: T097-6498-00287
Reviewer: M. Caraher
Date: 04/30/98

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

43.5

381.1

Emission Factor in lb/MMCF	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	13.7	13.7	0.6	100.0	2.8	35.0
Potential Emission in tons/yr	2.6	2.6	0.1	19.1	0.5	6.7
Methodology tons sum of 4 vaporizers	10.4	10.4	0.5	76.2	2.1	26.7

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 140, Manufacturer estimate = 100, Low NOx Burner = 81, Flue gas recirculation = 30

Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02 & NOx supplied by CG&CU through Manufacturer

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Salt Bath Regeneration
 Fuel Combustion
 at 4.0 MMBtu/hr
 Emission Unit ID SBR 1

Appendix A: Emissions Calculations

Natural Gas Combustion Only

Used AP-42 emfacs for Commercial Boiler <10 MMBtu/hr

Salt Bath Regeneration fuel combustion

Company Name: Citizen's Gas & Coke Utility - LNG South

Address City IN Zip: 3565 Big Four Road, Beech Grove, IN 46203

CP:

Plt ID: T097-6498-00287

Reviewer: M. Caraher

Date: 05/26/98

Heat Input Capacity
 MMBtu/hr

Potential Throughput
 MMCF/yr

4.0

35.0

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.2	0.2	0.0	1.8	0.1	0.4

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Waukesha Emergency Generator
1250 kw output
Natural Gas Fired
Emission Unit ID WEG 1**

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Internal Combustion Engines - Industrial Reciprocating
> 447 kw**

**Company Name: Citizen's Gas & Coke Utility - LNG South
Address City IN Zip: 3565 Big Four Road, Beech Grove, IN 46203
CP:
Plt ID: T097-6498-00287
Reviewer: M. Caraher
Date: 05/26/98**

output kw rating
1250

equivalent MMBtu rating
4.3

equivalent horsepower	resultant MMCF/hr
1676	0.00426

Emission Factor lbs / MMCF	PM	PM10	SOx	NOx	VOC	CO
	10.0	10.0	0.6	3400.0	82.9	430.0
Potential Emissions lbs/hr	0.0	0.0	0.0	14.5	0.4	1.8
tons/yr @ 500 hrs/yr	0.0	0.0	0.0	3.6	0.1	0.5

Methodology

AP-42 Appendix A Conversion Factor: 1 kilowatt hour = 3410 Btu
AP-42 Appendix A Conversion Factor: 1 horsepower = 2.5435E03 Btu

Equivalent MMBtu rating: output kw rating x 3410 / 1,000,000

Equivalent Horsepower: million Btu / 2.5435E03

resultant MMCF / hr: equivalent MMBtu/hr rating / 1000

Emission Factor (lbs / MMCF): from SCC# 2-02-002-02 Internal Combustion Engines - Industrial Natural Gas Fired Reciprocating Engines

Potential Emissions (lbs / hr): MMCF / hr x lbs / MMCF

Potential Emissions (tons / yr): lbs / hr emissions x 500 operating hrs / yr x ton / 2000 lbs

**Emergency Fire Pump
Electric but with diesel
fuel as backup
Emission Unit ID EFP 1**

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Internal Combustion Engines - Industrial Reciprocating
> 447 kw
Citizen's Gas & Coke Utility - LNG South
3565 Big Four Road, Beech Grove, IN 46203

T097-6498-00287
M. Caraher
05/26/98**

maximum
heat input
MMBtu / hr
4.0

equivalent
kilowatt hr
1173.0

fuel S = 0.4 percent by weight

equivalent
horsepower
1573

	PM	PM10	SOx	NOx	VOC	CO
Emission Factor lbs / MMBtu grams / kw hr	0.1 ---	0.1 ---	--- 4.92(S)	--- 14.0	--- 0.4	--- 3.2
Potential Emissions lbs / hr	0.3	0.2	5.1	36.2	1.0	8.3
tons / yr @ 500 hrs / yr	0.1	0.1	1.3	9.0	0.3	2.1

Methodology

AP-42 Appendix A Conversion Factor: 1 kilowatt hour = 3410 Btu
AP-42 Appendix A Conversion Factor: 1 horsepower = 2.5435E03 Btu

- Equivalent kw hr rating: (max heat input MMBtu / hr) / (3410 Btu / kw hr)
- Equivalent Horsepower: million Btu / 2.5435E03
- Emission Factor (lbs / MMBtu): from AP-42 Table 3.4-5 PM Emission Factors for Large Uncontrolled Stationary Diesel Engines
- Emission Factor (grams / kw hr): from AP-42 Table 3.4-1 Gaseous Emission Factors for Large Uncontrolled Stationary Diesel Engines
- Potential Emissions (lbs / hr): emfac x heat input or kw hr output
- Potential Emissions (tons / yr): lbs / hr emissions x 500 operating hrs / yr x ton / 2000 lbs

Emission Unit ID 01
Clark Engine

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

Company Name: Citizen's Gas & Coke Utility (LNG South)
Address City IN Zip: 3565 Big Four Road, Beech Grove, IN 46203
CP:
Plt ID: T097-6498-00287
Reviewer: M. Caraher
Date: 04/30/98

Heat Input Capacity
MMBtu/hr

33.36

Horsepower output

3520.00 stated on GSD Form

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	10.0	10.0	0.6	---	---	---
Emission Factor in lb/HP-hr	---	---	---	2.40E-02	9.48E-04	3.31E-03
Potential Emission in tons/yr	1.5	1.5	0.1	370.0	14.6	51.0

Methodology

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

Emfacs in lb/HP - hr from AP-42 Table 3.2-2 Criteria Emission Factors for Uncontrolled Natural Gas Prime Movers (2-Cycle Lean Burn)

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

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