NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a Significant Revision to a Federally Enforceable State Operating Permit (FESOP)

for Vectren Corporation, d.b.a. Indiana Gas Company, Incorporated, Hendricks County Junction in Hendricks County

Significant Permit Revision No.: 063-42096-00018

The Indiana Department of Environmental Management (IDEM) has received an application from Vectren Corporation, d.b.a. Indiana Gas Company, Incorporated, Hendricks County Junction (Vectren), located at 7955 East Maloney Road, Brownsburg, Indiana 46112, for a significant revision of its FESOP issued on May 3, 2018. If approved by IDEM’s Office of Air Quality (OAQ), this proposed revision would allow Vectren to make certain changes at its existing source. Vectren has applied to change descriptive information about the compressor engines, construct a new comfort heater, replace an existing line heater, and remove of a flare.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). The potential to emit regulated air pollutants will continue to be limited to less than the Title V major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

IDEM is aware that the line heater FCU-01 has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft permit contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

A copy of the permit application and IDEM’s preliminary findings are available at:

Brownsburg Public Library
450 S. Jefferson St.
Brownsburg, IN 46112

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

A copy of the preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.
You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 063-42096-00018 in all correspondence.

Comments should be sent to:

Doug Logan
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Doug Logan or (317) 234-5328
Or dial directly: (317) 234-5328
Fax: (317) 232-6749 attn: Doug Logan
E-mail: dlogan@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.
If you have any questions, please contact Doug Logan of my staff at the above address.

Brian Williams, Section Chief
Permits Branch
Office of Air Quality
Mr. Mark Wannemueller  
Vectren Corporation  
P.O. Box 209  
Evansville, Indiana 47702-0209

Re: 063-42096-00018  
Significant Revision to  
F063-39041-00018

Dear Mr. Wannemueller:

Vectren Corporation, d.b.a. Indiana Gas Company, Incorporated, Hendricks County Junction (Vectren) was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F063-39041-00018, on May 3, 2018, for a stationary natural gas distribution source located at 7955 East Maloney Road, Brownsburg, Indiana 46112. On October 21, 2019, the Office of Air Quality (OAQ) received an application from the source requesting a change to descriptive information about the compressor engines, construction of a new comfort heater, replacement of an existing line heater, and removal of a flare. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1 (f). Pursuant to the provisions of 326 IAC 2-8-11.1, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, the following emission units are approved for construction at the source:

- One (1) natural gas-fired comfort heater, identified as CH-01, approved in 2019 for construction, with a maximum heat input capacity of 0.40 MMBtu/hr, and exhausting outdoors.
- One (1) natural gas-fired line heater, identified as FCU-01, constructed in 2014, with a maximum heat input capacity of 4.00 MMBtu/hr, and exhausting outdoors.

The following construction conditions are applicable to the proposed project:

**General Construction Conditions**

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

**Effective Date of the Permit**

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
Commenced Construction

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the Significant Permit Revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised. The permit references the below-listed attachment(s). Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this revision:


Previously issued approvals for this source containing this attachment are available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

Previously issued approvals for this source are also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.


A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. A copy of the permit is also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
If you have any questions regarding this matter, please contact Doug Logan, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-5328 or (800) 451-6027, and ask for Doug Logan or (317) 234-5328.

Sincerely,

Brian Williams, Section Chief
Permits Branch
Office of Air Quality

Attachments: Revised permit and Technical Support Document.

cc: File - Hendricks County
Hendricks County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

Vectren Corporation, d.b.a. Indiana Gas Company, Incorporated,
Hendricks County Junction
7955 East Maloney Road
Brownsburg, Indiana 46112

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.
# TABLE OF CONTENTS

## SECTION A
**SOURCE SUMMARY**

A.1 General Information [326 IAC 2-8-3(b)]
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(1)(I)]
A.4 FESOP Applicability [326 IAC 2-8-2]

## SECTION B
**GENERAL CONDITIONS**

B.1 Definitions [326 IAC 2-8-1]
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
B.3 Term of Conditions [326 IAC 2-1.1-9.5]
B.4 Enforceability [326 IAC 2-8-6][IC 13-17-12]
B.5 Severability [326 IAC 2-8-4(4)]
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]
B.12 Emergency Provisions [326 IAC 2-8-12]
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]
B.16 Permit Renewal [326 IAC 2-8-3(h)]
B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]
B.19 Source Modification Requirement [326 IAC 2-8-11.1]
B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]
B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

## SECTION C
**SOURCE OPERATION CONDITIONS**

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]
C.2 Overall Source Limit [326 IAC 2-8]
C.3 Opacity [326 IAC 5-1]
C.4 Open Burning [326 IAC 4-1][IC 13-17-9]
C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]
C.6 Fugitive Dust Emissions [326 IAC 6-4]
C.7 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

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

C.8 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
C.11 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]
Corrective Actions and Response Steps  [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)] ..................... 19
C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

Record Keeping and Reporting Requirements  [326 IAC 2-8-4(3)] ........................................... 21
C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection ........................................................................................................ 22
C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS ......................................................... 23

Emission Limitations and Standards [326 IAC 2-8-4(1)] ......................................................... 23
D.1.1 FESOP Emission Limitations [326 IAC 2-8-4]
D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements [326 IAC 2-8-4] ...................................................... 23
D.1.3 Compliance Determination

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] ........................................... 24
D.1.4 Record Keeping Requirements
D.1.5 Reporting Requirements

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS ......................................................... 25

Emission Limitations and Standards [326 IAC 2-8-4(1)] ......................................................... 25
D.2.1 Particulate Emissions [326 IAC 6-2-4]
D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

SECTION E.1 NESHAP .......................................................................................................................... 26

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-8-4(1)] ........................................................................................................... 26

CERTIFICATION ............................................................................................................................... 28

EMERGENCY OCCURRENCE REPORT ............................................................................................ 29

FESOP Quarterly Report .................................................................................................................... 31

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT ....................................... 32

SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary natural gas distribution source.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>7955 East Maloney Road, Brownsburg, Indiana 46112</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>(812) 491-4000</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>4922 (Natural Gas Transmission) &amp; 4924 (Natural Gas Distribution)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Hendricks</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Federally Enforceable State Operating Permit Program</td>
</tr>
<tr>
<td></td>
<td>Minor Source, under PSD and Emission Offset Rules</td>
</tr>
<tr>
<td></td>
<td>Minor Source, Section 112 of the Clean Air Act</td>
</tr>
<tr>
<td></td>
<td>Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

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

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

(a) Two (2) 650 brake horsepower four (4) cycle natural gas-fired, rich burn, naturally aspirated reciprocating internal combustion engines with natural gas compressors, identified as CE-3 and CE-4, installed in 1979, and exhausting to stacks CE-3 and CE-4 respectively.

Under 40 CFR 63, Subpart ZZZZ the compressor engines (CE-3 and CE-4) are existing stationary RICE at an area source of HAP emissions.

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

This stationary source also includes the following insignificant activities:

(a) Reserved

(b) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour (higher heating value (HHV)):

(1) One (1) natural gas-fired line heater, identified as FCU-01, constructed in 2014, with a maximum heat input capacity of 4.00 MMBtu/hr, and exhausting outdoors.

(2) One (1) line heater, identified as FCU-03, installed in 1994, with a maximum heat input capacity of 0.50 MMBtu/hr, and exhausting outdoors.

(3) One (1) pipeline utility heater, identified as FCU-04, permitted in 2017, with a maximum heat input capacity of 5.00 MMBtu/hr, using no controls and exhausting to stack S/V-06.
(4) One (1) natural gas-fired comfort heater, identified as CH-01, approved in 2019 for construction, with a maximum heat input capacity of 0.40 MMBtu/hr, and exhausting outdoors.

(c) Combustion source flame safety purging on startup.

(d) The following VOC and HAP storage containers: Two (2) storage tanks with capacities less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(e) The following VOC and HAP storage containers: Vessels storing lubricating oil, hydraulic oils, machining oils and machining fluids.

(f) Closed loop heating systems.

(g) Heat exchanger cleaning and repair.

(h) Process vessel degassing and cleaning to prepare for internal repairs.

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

(j) Purge double block and bleed valves.

(k) Filter or coalescer media changeout.

(l) Numerous valves and flanges.

A.4 FESOP Applicability [326 IAC 2-8-2] This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).
SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, F063-39041-00018, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

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

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

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

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

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

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

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

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

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

If, due to circumstances beyond the Permittee's control, the PMPs 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 and Enforcement Branch, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The
PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

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

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

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

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

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

   Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
   Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
   Facsimile Number: 317-233-6865

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;
(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

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

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

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

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

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

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F063-39041-00018 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,
(2) revised, or
(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(1) That this permit contains a material mistake.
(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]
B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

1. The changes are not modifications under any provision of Title I of the Clean Air Act;
2. Any approval required by 326 IAC 2-8-11.1 has been obtained;
3. The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
4. The Permittee notifies the:
   - Indiana Department of Environmental Management
     Permit Administration and Support Section, Office of Air Quality
     100 North Senate Avenue
     MC 61-53 IGCN 1003
     Indianapolis, Indiana 46204-2251
   - United States Environmental Protection Agency, Region 5
     Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
     77 West Jackson Boulevard
     Chicago, Illinois 60604-3590

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

5. The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.
B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.
SECTION C  SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity  [326 IAC 5-1]

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

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

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

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-
1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in
accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit.
The Permittee shall not operate a refuse incinerator or refuse burning equipment except as
provided in 326 IAC 9-1-2 or in this permit.

C.6 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of
the property, right-of-way, or easement on which the source is located, in a manner that would
violate 326 IAC 6-4 (Fugitive Dust Emissions).

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

**C.8 Performance Testing [326 IAC 3-6]**

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

**Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

(a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.12 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:
The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(a) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
/DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

C.17 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 applicable standards for recycling and emissions reduction.
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Two (2) 650 brake horsepower four (4) cycle natural gas-fired, rich burn, naturally aspirated reciprocating internal combustion engines with natural gas compressors, identified as CE-3 and CE-4, installed in 1979, and exhausting to stacks CE-3 and CE-4 respectively.

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

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

D.1.1 FESOP Emission Limitations [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

(a) The throughput of natural gas delivered to the two (2) engines (CE-3 and CE-4) shall not exceed a total of 50.67 million cubic feet per twelve (12) consecutive month period with compliance to be determined at the end of each month.

(b) NOx emissions from each engine (CE-3 and CE-4) shall not exceed 2,254.20 pounds per million cubic feet of natural gas combusted.

(c) CO emissions from each engine (CE-3 and CE-4) shall not exceed 3,794.40 pounds per million cubic feet of natural gas combusted.

(d) Pursuant to FESOP 063-6137-00018, issued on December 9, 1996, the two (2) engines (CE-3 and CE-4) shall use natural gas only.

Compliance with these limits, combined with the potential to emit NOx and CO from all other emission units at this source, shall limit the source-wide total potential to emit of NOx and CO to less than one hundred (100) tons per year, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable to the source.

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

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-8-4]

D.1.3 Compliance Determination

(a) Compliance with the NOx emission limit contained in Condition D.1.1(b) shall be determined using the following equation:

\[ E_{NOx} = H \times F_{NOx} \]

Where:

- \( E_{NOx} \) = NOx Emissions (lbs NOx/MMCF)
- \( H \) = Higher Heating Value (1,020 MMBtu/ MMCF)
- \( F_{NOx} \) = NOx Emission factor for natural gas powered reciprocating internal combustion engines (2.21 lbs NOx/ MMBtu)
(b) Compliance with the CO emission limits contained in Condition D.1.1(c) shall be determined using the following equation:

\[ E_{CO} = H \times F_{CO} \]

Where:

- \( E_{CO} \) = CO Emissions (lbs CO/MMCF)
- \( H \) = Higher Heating Value (1,020 MMBtu/MMCF)
- \( F_{CO} \) = CO Emission factor for natural gas powered reciprocating internal combustion engines (3.72 lbs CO/ MMBtu)

HHV and Emission Factor are from AP-42 (Supplement F, July 2000), Table 3.2-3

---

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

**D.1.4 Record Keeping Requirements**

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records of the natural gas delivered to the two (2) engines (CE-3 and CE-4). The Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the NOx and CO emissions limits established in Condition D.1.1.

1. The total amount of natural gas delivered to the two (2) engines (CE-3 and CE-4) each month; and
2. Total NOx emissions from the two (2) engines (CE-3 and CE-4).
3. Total CO emissions from the two (2) engines (CE-3 and CE-4).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

**D.1.5 Reporting Requirements**

A quarterly summary of the information to document the compliance status with Condition D.1.1(a) shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-2.2-2(1).
SECTION D.2  
EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

(b) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour (higher heating value (HHV)):

1. One (1) natural gas-fired line heater, identified as FCU-01, constructed in 2014, with a maximum heat input capacity of 4.00 MMBtu/hr, and exhausting outdoors.

2. One (1) line heater, identified as FCU-03, installed in 1994, with a maximum heat input capacity of 0.50 MMBtu/hr, and exhausting outdoors.

3. One (1) pipeline utility heater, identified as FCU-04, permitted in 2017, with a maximum heat input capacity of 5.00 MMBtu/hr, using no controls and exhausting to stack S/V-06.

4. One (1) natural gas-fired comfort heater, identified as CH-01, approved in 2019 for construction, with a maximum heat input capacity of 0.40 MMBtu/hr, and exhausting outdoors.

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

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

D.2.1 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Unit ID</th>
<th>Pt (lb/MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>line heater</td>
<td>FCU-01</td>
<td>0.6</td>
</tr>
<tr>
<td>line heater</td>
<td>FCU-03</td>
<td>0.6</td>
</tr>
<tr>
<td>pipeline utility heater</td>
<td>FCU-04</td>
<td>0.6</td>
</tr>
<tr>
<td>comfort heater</td>
<td>CH-01</td>
<td>0.6</td>
</tr>
</tbody>
</table>

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
SECTION E.1 NESHAP

Emissions Unit Description:

(a) Two (2) 650 brake horsepower four (4) cycle natural gas-fired, rich burn, naturally aspirated reciprocating internal combustion engines with natural gas compressors, identified as CE-3 and CE-4, installed in 1979, and exhausting to stacks CE-3 and CE-4 respectively.

Under 40 CFR 63, Subpart ZZZZ the compressor engines (CE-3 and CE-4) are existing stationary RICE at an area source of HAP emissions.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-8-4(1)]


(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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


The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-82, for the emission unit(s) listed above:

(1) 40 CFR 63.6580
(2) 40 CFR 63.6585
(3) 40 CFR 63.6590(a)(1)(iii) and (iv)
(4) 40 CFR 63.6595(a)(1), (b), and (c)
(5) 40 CFR 63.6603(a) and (f)
(6) 40 CFR 63.6605
(7) 40 CFR 63.6612
(8) 40 CFR 63.6620(a), (d), (e), (f), (g), (h), and (i)
(9) 40 CFR 63.6625(e)(10) and (h)
(10) 40 CFR 63.6630 (a), (b), (c), (d), and (e)
(11) 40 CFR 63.6635
(12) 40 CFR 63.6640(a), (b), (c), and (e)
(13) 40 CFR 63.6645(a)(2), (g), and (h)
(14) 40 CFR 63.6650
(15) 40 CFR 63.6655
(16) 40 CFR 63.6660
(17) 40 CFR 63.6665
(18) 40 CFR 63.6670
(19) 40 CFR 63.6675
(20) Table 2d (item 11 and 12)
(21) Table 4
(22) Table 5 (item 13 and 14)
(23) Table 6 (item 15)
(24) Table 7 (item 3)
(25) Table 8
(26) Appendix A
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Vectren Corporation, d.b.a. Indiana Gas Company, Incorporated, Hendricks County Junction
Source Address: 7955 East Maloney Road, Brownsburg, Indiana 46112
FESOP Permit No.: F063-39041-00018

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)___________________________________________________

☐ Report (specify)_______________________________________________________

☐ Notification (specify)__________________________________________________

☐ Affidavit (specify)_______________________________________________________

☐ Other (specify)_________________________________________________________

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

Signature:

Printed Name:

Title/Position:

Date:
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Vectren Corporation, d.b.a. Indiana Gas Company, Incorporated, Hendricks County Junction
Source Address: 7955 East Maloney Road, Brownsburg, Indiana 46112
FESOP Permit No.: F063-39041-00018

This form consists of 2 pages

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
  • The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  • The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12

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

<table>
<thead>
<tr>
<th>Facility/Equipment/Operation:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Control Equipment:</td>
</tr>
<tr>
<td>Permit Condition or Operation Limitation in Permit:</td>
</tr>
<tr>
<td>Description of the Emergency:</td>
</tr>
<tr>
<td>Describe the cause of the Emergency:</td>
</tr>
<tr>
<td>If any of the following are not applicable, mark N/A</td>
</tr>
<tr>
<td>---------------------------------------------------</td>
</tr>
<tr>
<td><strong>Date/Time Emergency started:</strong></td>
</tr>
<tr>
<td><strong>Date/Time Emergency was corrected:</strong></td>
</tr>
<tr>
<td><strong>Was the facility being properly operated at the time of the emergency?</strong></td>
</tr>
<tr>
<td><strong>Describe:</strong></td>
</tr>
<tr>
<td><strong>Type of Pollutants Emitted:</strong> TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:**</td>
</tr>
<tr>
<td><strong>Estimated amount of pollutant(s) emitted during emergency:</strong></td>
</tr>
<tr>
<td><strong>Describe the steps taken to mitigate the problem:</strong></td>
</tr>
<tr>
<td><strong>Describe the corrective actions/response steps taken:</strong></td>
</tr>
<tr>
<td><strong>Describe the measures taken to minimize emissions:</strong></td>
</tr>
<tr>
<td><strong>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:</strong></td>
</tr>
</tbody>
</table>

**Form Completed by:**

**Title / Position:**

**Date:**

**Phone:**
Source Name: Vectren Corporation, d.b.a. Indiana Gas Company, Incorporated, Hendricks Count Junction
Source Address: 7955 East Maloney Road, Brownsburg, Indiana 46112
FESOP Permit No.: F063-39041-00018
Facility: Two (2) engines (CE-3 and CE-4)
Parameter: Natural gas throughput
Limit: The throughput of natural gas delivered to the two (2) engines (CE-3 and CE-4) shall not exceed a total of 50.67 million cubic feet per twelve (12) consecutive month period

<table>
<thead>
<tr>
<th>QUARTER</th>
<th>YEAR</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>This Month (MMCF)</td>
<td>Previous 11 Months (MMCF)</td>
<td>12 Month Total (MMCF)</td>
</tr>
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</tbody>
</table>

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on: ________________________________

Submitted by: _____________________________________________
Title / Position: __________________________________________
Signature: _______________________________________________
Date: ___________________________________________________
Phone: ___________________________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Vectren Corporation, d.b.a. Indiana Gas Company, Incorporated, Hendricks County Junction
Source Address: 7955 East Maloney Road, Brownsburg, Indiana 46112
FESOP Permit No.: F063-39041-00018

Months: ___________ to ____________ Year: ______________

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

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
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<tbody>
<tr>
<td>Number of Deviations:</td>
<td></td>
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<tr>
<td>Probable Cause of Deviation:</td>
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<tr>
<td>Response Steps Taken:</td>
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<td>Response Steps Taken:</td>
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<td>Permit Requirement (specify permit condition #)</td>
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<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
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<td>Probable Cause of Deviation:</td>
<td></td>
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<tr>
<td>Response Steps Taken:</td>
<td></td>
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</tbody>
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<td>Number of Deviations:</td>
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<td>Probable Cause of Deviation:</td>
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<td>Response Steps Taken:</td>
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<td>Probable Cause of Deviation:</td>
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<tr>
<td>Response Steps Taken:</td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: ____________________________
Title / Position: ____________________________
Date: _______________________________________
Phone: _______________________________________


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

Source Description and Location

Source Name: Vectren Corporation, d.b.a. Indiana Gas Company, Incorporated, Hendricks County Junction
Source Location: 7955 East Maloney Road, Brownsburg, Indiana 46112
County: Hendricks
SIC Code: 4922 (Natural Gas Transmission)
Operation Permit No.: F 063-39041-00018
Operation Permit Issuance Date: May 3, 2018
Significant Permit Revision No.: 063-42096-00018
Permit Reviewer: Doug Logan

Existing Approvals

The source was issued FESOP Renewal No. 063-39041-00018 on May 3, 2018. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Hendricks County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.¹</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Hendricks County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM₂.₅
Hendricks County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Hendricks County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of Utility Air Regulatory Group v. EPA, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court’s decision. U.S. EPA’s guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions Prior to Revision (ton/year)</th>
<th>PM$^1$</th>
<th>PM$_{10}$$^1$</th>
<th>PM$_{2.5}$$^1,2$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Combined HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>0.50</td>
<td>1.13</td>
<td>1.13</td>
<td>6.28E-03</td>
<td>99.46</td>
<td>2.06</td>
<td>99.28</td>
<td>1.46</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
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<td>100</td>
<td>25</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
</tr>
</tbody>
</table>

$^1$Under the Part 70 Permit program (40 CFR 70), PM$_{10}$ and PM$_{2.5}$, not particulate matter (PM), are each considered as a “regulated air pollutant.”
$^2$PM$_{2.5}$ listed is direct PM$_{2.5}$.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
(b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(c) These emissions are based on the TSD of FESOP Renewal No. 063-39041-00018, issued on May 3, 2018.

### Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Vectren Corporation, d.b.a. Indiana Gas Company, Incorporated, Hendricks County Junction on October 21, 2019, relating to changing descriptive information about the compressor engines, construction of a new comfort heater, modification of an existing line heater, and removal of a flare.

The following is a list of the new emission units:

- One (1) natural gas-fired comfort heater, identified as CH-01, approved in 2019 for construction, with a maximum heat input capacity of 0.40 MMBtu/hr, and exhausting outdoors.

The following emission unit was constructed and/or operated without a permit:

- One (1) natural gas-fired line heater, identified as FCU-01, constructed in 2014, with a maximum heat input capacity of 4.00 MMBtu/hr, and exhausting outdoors.

As part of this permitting action, the following emission units are being removed the permit:

- One (1) flare, identified as FCU-02, installed in 1994 with a capacity of 0.69 MMBtu/hr (higher heating value (HHV)).

### Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction and operating permit rules.

### Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

### Permit Level Determination – FESOP Significant Permit Revision

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. If the control equipment...
has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}^1$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Combined HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>FCU-01</td>
<td>3.26E-02</td>
<td>0.13</td>
<td>0.13</td>
<td>1.03E-02</td>
<td>1.72</td>
<td>9.45E-02</td>
<td>1.44</td>
<td>3.24E-02</td>
</tr>
<tr>
<td>CH-01</td>
<td>3.26E-03</td>
<td>1.31E-02</td>
<td>1.31E-02</td>
<td>1.03E-03</td>
<td>0.17</td>
<td>9.45E-03</td>
<td>0.14</td>
<td>3.24E-03</td>
</tr>
<tr>
<td>Total PTE Before Controls of the New Emission Units:</td>
<td>3.59E-02</td>
<td>0.14</td>
<td>0.14</td>
<td>1.13E-02</td>
<td>1.89</td>
<td>0.10</td>
<td>1.59</td>
<td>3.57E-02</td>
</tr>
</tbody>
</table>

$^1$PM$_{2.5}$ listed is direct PM$_{2.5}$.

Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

Pursuant to 326 IAC 2-8-11.1(f), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves adding a FESOP limit.

## PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions After Issuance (ton/year)</th>
<th>PM$^1$</th>
<th>PM$_{10}$$^1$</th>
<th>PM$_{2.5}$$^{1,2}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives*</td>
<td>0.51</td>
<td>1.18</td>
<td>1.18</td>
<td>6.72E-02</td>
<td>61.66</td>
<td>2.06</td>
<td>99.89</td>
<td>1.48</td>
</tr>
<tr>
<td>Total PTE of Entire Source</td>
<td>0.51</td>
<td>1.18</td>
<td>1.18</td>
<td>6.72E-02</td>
<td>61.66</td>
<td>2.33</td>
<td>99.89</td>
<td>1.48</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>25</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
</tr>
</tbody>
</table>

$^1$Under the Part 70 Permit program (40 CFR 70), PM$_{10}$ and PM$_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."

$^{2}$PM$_{2.5}$ listed is direct PM$_{2.5}$.

*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to take NO$_x$ and CO limit(s) in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-8 (FESOP) for more information regarding the limit(s).

(a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the potential to emit criteria pollutants and HAPs from the entire source will continue to be less
than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).

(b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Due to the proposed revision, federal rule applicability has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) The requirements of the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for FCU-01 and CH-01, because the units are not steam generating units as defined at 40 CFR 60.41c

(b) The requirements of the Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011, 40 CFR 60, Subpart KKK and 326 IAC 12, are still not included in the permit for FCU-01, because the source is not a natural gas processing plant as defined at 40 CFR 60.631.

(c) The requirements of the Standards of Performance for SO₂ Emissions From Onshore Natural Gas Processing for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011, 40 CFR 60, Subpart LLL and 326 IAC 12, are still not included in the permit for FCU-01, because the unit is not an affected facility designated in 40 CFR 60.640. The unit is not a sweetening unit or a sweetening unit followed by a sulfur recovery unit.

(d) The requirements of the Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015, 40 CFR 60, Subpart OOOOa and 326 IAC 12, are not included in the permit for CH-01, because the unit is not part of the group of all equipment within a process unit as defined at 40 CFR 60.5430a.

(e) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed revision.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) from Oil and Natural Gas Production Facilities, 40 CFR 63, Subpart HH and 326 IAC 20-30 are still not included in the permit for FCU-01, since the source is not a facility that processes, upgrades, or stores natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category and the source is not a major source of HAP emissions.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) from Natural Gas Transmission and Storage Facilities, 40 CFR 63, Subpart HHH and 326 IAC 20-31 are still not included in the permit for FCU-01, since the source is not a major source of HAP emissions.

(c) Upon further review, IDEM, OAQ finds that the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Stationary Reciprocating Internal Combustion
Engines, 40 CFR 63, Subpart ZZZZ and 326 IAC 20-82 are not applicable to the emergency generator, EG-01, since the unit is not a stationary engine. The unit is a non-road engine as defined at 40 CFR 1068.30 because it is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. The source represents that the exclusion at paragraph (2)(iii) of the definition of nonroad engine in 40 CFR 1068.30 does not apply to emergency generator EG-01 because the engine has not remained and will not remain at a location for more than 12 consecutive months. A location is any single site at a building, structure, facility, or installation.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) from Oil and Natural Gas Production Facilities, 40 CFR 63, Subpart DDDDD and 326 IAC 20-95 are not included in the permit for FCU-01 and CH-01, since CH-01 is not a boiler or process heater as defined at 40 CFR 63.7575 and the source is not a major source of HAP emissions.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ are not included in the permit for FCU-01 and CH-01, since the units are not boilers as defined at 40 CFR 63.11237.

(f) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included for this proposed revision.

Compliance Assurance Monitoring (CAM):

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

<table>
<thead>
<tr>
<th>State Rule Applicability - Entire Source</th>
</tr>
</thead>
</table>

Due to this revision, state rule applicability has been reviewed as follows:

326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)
PSD and Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The emission units FCU-01 and CH-01 will each emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

FESOP NOx and CO Limits
Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable, the Permittee shall comply with the following:

(a) The throughput of natural gas delivered to the two (2) engines (CE-3 and CE-4) shall not exceed a total of 50.67 million cubic feet per twelve (12) consecutive month period with compliance to be determined at the end of each month.

(b) NOx emissions from each engine (CE-3 and CE-4) shall not exceed 2,254.20 pounds per million cubic feet of natural gas combusted.

(c) CO emissions from each engine (CE-3 and CE-4) shall not exceed 3,794.40 pounds per
million cubic feet of natural gas combusted.

(d) Pursuant to FESOP 063-6137-00018, issued on December 9, 1996, the two (2) engines (CE-3 and CE-4) shall use natural gas only.

Compliance with these limits, combined with the potential to emit NOx and CO from all other emission units at this source, shall limit the source-wide total potential to emit of NOx and CO to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

Due to this modification, the unlimited NOx emissions now exceed 100 tons per year. Therefore, a new NOx emission limit has been included for the existing engines to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Hendricks County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Hendricks County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

### State Rule Applicability – Individual Facilities

Due to the proposed revision, state rule applicability has been reviewed as follows:

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:

\[
Pt = \frac{1.09}{Q^{0.26}}
\]

Where:

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

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.

<table>
<thead>
<tr>
<th>Facility</th>
<th>Construction Date (Removal Date)</th>
<th>Operating Capacity (MMBtu/hr)</th>
<th>Q (MMBtu/hr)</th>
<th>Calculated Pt (lb/MMBtu)</th>
<th>Particulate Limitation, (Pt) (lb/MMBtu)</th>
<th>PM PTE based on AP-42 (lb/MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>FCU-01</td>
<td>1994 (2014)</td>
<td>2.00</td>
<td>2.50</td>
<td>0.86</td>
<td>0.6</td>
<td>0.002</td>
</tr>
</tbody>
</table>
Indirect Heating Units Which Began Operation After September 21, 1983

<table>
<thead>
<tr>
<th>Facility</th>
<th>Construction Date (Removal Date)</th>
<th>Operating Capacity (MMBtu/hr)</th>
<th>Q (MMBtu/hr)</th>
<th>Calculated Pt (lb/MMBtu)</th>
<th>Particulate Limitation, Pt (lb/MMBtu)</th>
<th>PM PTE based on AP-42 (lb/MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>FCU-03</td>
<td>1994</td>
<td>0.50</td>
<td>2.50</td>
<td>0.86</td>
<td>0.6</td>
<td>0.002</td>
</tr>
<tr>
<td>FCU-01</td>
<td>2014</td>
<td>4.00</td>
<td>4.50</td>
<td>0.74</td>
<td>0.6</td>
<td>0.002</td>
</tr>
<tr>
<td>FCU-04</td>
<td>2017</td>
<td>5.00</td>
<td>9.50</td>
<td>0.61</td>
<td>0.6</td>
<td>0.002</td>
</tr>
<tr>
<td>CH-01</td>
<td>2019</td>
<td>0.40</td>
<td>9.90</td>
<td>0.60</td>
<td>0.6</td>
<td>0.002</td>
</tr>
</tbody>
</table>

Where: \( Q = \) Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed.

Note: Values shown in strikethrough were based on an incorrect heat input capacity provided for FCU-01 prior to SPR No. 063-42096-00018. Because the combined heat input capacity never exceed 10 MMBtu/hr, Pt was and remains 0.6 lb/MMBtu.

FCU-02 (not shown in this table) was a flare, not a source of indirect heating.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1.5(2), the emission units FCU-01 and CH-01 are not subject to the requirements of 326 IAC 6-3, since the units do not produce particulate in the production of a product.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
The emission units FCU-01 and CH-01 are not subject to 326 IAC 7-1.1 because each unit has a potential to emit (or limited potential to emit) sulfur dioxide (SO₂) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, the emission units FCU-01 and CH-01 were constructed after January 1, 1980, the units are not subject to the requirements of 326 IAC 8-1-6 because the unlimited VOC potential emissions of each unit are less than twenty-five (25) tons per year.

326 IAC 9-1 (Carbon Monoxide Emission Limits)
The requirements of 326 IAC 9-1 do not apply to the emission units FCU-01 and CH-01, because this source does not operate a catalytic regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment; or refuse incineration and refuse burning equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)
(a) Pursuant to 326 IAC 10-1-1(a), this source (located in Henry County) is not subject to the requirements of 326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties) because it is not located in Clark or Floyd County.

(b) Neither emission unit FCU-01 nor CH-01 is a "unit" as defined at 326 IAC 10-2-2(20). Therefore, units FCU-01 and CH-01 are not subject to the requirements of 326 IAC 10-2 (NOₓ Emissions from Large Affected Units).

(c) The requirements of 326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories) do not apply to the emission units FCU-01 and CH-01, since these units are not blast furnace gas-fired boilers, Portland cement kilns, or a facilities specifically listed under 326 IAC 10-3-1(a)(2).

(d) Pursuant to 326 IAC 1-5-1, 326 IAC 10-5 (Nitrogen Oxide Reduction Program for Internal Combustion Engines (ICE)) is not applicable to the emission units FCU-01 and CH-01 because
the units are not large NOx SIP Call engines or other stationary internal combustion engines subject to NOx control under a compliance plan under 326 IAC 10-5-3.

Compliance Determination and Monitoring Requirements

(a) The Compliance Determination Requirements applicable to this revision are as follows:

(1) Compliance with the NOx emission limit shall be determined using the following equation:

\[ \text{ENOx} = H \times F_{\text{NOx}} \]

Where:

\[ \text{ENOx} = \text{NOx Emissions (lbs CO/MMCF)} \]
\[ H = \text{Higher Heating Value (1,020 MMBtu/ MMCF)} \]
\[ F_{\text{NOx}} = \text{NOx Emission factor for natural gas powered reciprocating internal combustion engines (2.21 lbs NOx/ MMBtu)} \]

HHV and Emission Factor are from AP-42 (Supplement F, July 2000), Table 3.2-3

(2) Compliance with the CO emission limits shall be determined using the following equation:

\[ \text{ECO} = H \times F_{\text{CO}} \]

Where:

\[ \text{ECO} = \text{CO Emissions (lbs CO/MMCF)} \]
\[ H = \text{Higher Heating Value (1,020 MMBtu/ MMCF)} \]
\[ F_{\text{CO}} = \text{CO Emission factor for natural gas powered reciprocating internal combustion engines (3.72 lbs CO/ MMBtu)} \]

HHV and Emission Factor are from AP-42 (Supplement F, July 2000), Table 3.2-3

Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as strikethrough text and new language appears as bold text. Subsequent paragraphs were renumbered as needed to accommodate inserted or deleted material.

(1) IDEM, OAQ deleted incorrect descriptive information about NSCR controls on the compressor engines from Condition A.2 - Emission Units and Pollution Control Equipment Summary and the Section D.1 and Section E.1 emissions unit description boxes.

(2) IDEM, OAQ deleted emergency generator EG-01 and reserved paragraph (a) of Condition A.3 - Insignificant Activities because the unit is not a stationary engine. The insignificant activity has also been deleted from the Section E.1 emissions unit description box. Requirements for the emergency generator have been deleted from Condition E.1.2 - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines NESHAP and language of the condition was revised for a single set of applicable requirements.

(3) IDEM, OAQ revised paragraph (b) of Condition A.3 - Insignificant Activities and the Section D.2 emissions unit description box to incorporate new heaters and delete units that were removed.

(4) IDEM, OAQ revised paragraph (a) of Condition D.1.1 - FESOP Emission Limitations to current model language and added a new paragraph (b) to incorporate a NOx limitation for the compressor engines.
(5) IDEM, OAQ made the following changes to Condition D.1.2:
- The condition was renamed Compliance Determination to include the broader application.
- A new paragraph (a) was inserted to incorporate NOx compliance determination.
- The original text was designated paragraph (b) and revised to match the format of the new paragraph (a).

(6) Condition D.1.4 - Record Keeping Requirements was revised to incorporate requirements for NOx.

(7) IDEM, OAQ added the new unit CH-01 to the table in Condition D.2.1 - Particulate Emissions.

(8) IDEM, OAQ updated the limit statement in the FESOP Quarterly Report form to current model language.

Additional changes:

(1) IDEM, OAQ updated the model language for the regional office of the U.S. EPA in Chicago throughout the permit, as follows:

United States Environmental Protection Agency, Region V

The entire permit has been revised as follows:

SECTION A SOURCE SUMMARY

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

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

(a) Two (2) 650 brake horsepower four (4) cycle natural gas-fired, rich burn, naturally aspirated reciprocating internal combustion engines with natural gas compressors, identified as CE-3 and CE-4, installed in 1979, using a non-selective catalytic reduction (NSCR) unit as control, and exhausting to stacks CE-3 and CE-4 respectively.

Under 40 CFR 63, Subpart ZZZZ the compressor engines (CE-3 and CE-4) are existing stationary RICE at an area source of HAP emissions.

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

This stationary source also includes the following insignificant activities:

(a) One (1) gasoline emergency generator, identified as EG-01, permitted in 2001, rated at 110 horsepower. Reserved

Under 40 CFR 63, Subpart ZZZZ the emergency generator (EG-01) is an existing stationary RICE at an area source of HAP emissions.

(b) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour (higher heating value (HHV)):

(1) One (1) line heater, identified as FCU-01, installed in 1994 constructed in 2014, with a maximum heat input capacity of 2.00 4.00 MMBtu/hr, and exhausting outdoors (higher heating value (HHV)).

(2) One (1) flare, identified as FCU-02, installed in 1994 with a capacity of 0.69 MMBtu/hr (higher heating value (HHV)).
(32) One (1) line heater, identified as FCU-03, installed in 1994, with a maximum heat input capacity of 0.50 MMBtu/hr, and exhausting outdoors (higher heating value (HHV)).

(43) One (1) pipeline utility heater, identified as FCU-04, permitted in 2017, with a maximum heat input capacity of 5.00 MMBtu/hr, using no controls and exhausting to stack S/V-06.

(4) One (1) natural gas-fired comfort heater, identified as CH-01, approved in 2019 for construction, with a maximum heat input capacity of 0.40 MMBtu/hr, and exhausting outdoors.

(c) ...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

<table>
<thead>
<tr>
<th>Emissions Unit Description:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) Two (2) 650 brake horsepower four (4) cycle natural gas-fired, rich burn, naturally aspirated reciprocating internal combustion engines with natural gas compressors, identified as CE-3 and CE-4, installed in 1979, using a non-selective catalytic reduction (NSCR) unit as control, and exhausting to stacks CE-3 and CE-4 respectively.</td>
</tr>
</tbody>
</table>

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

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

D.1.1 FESOP Emission Limitations  [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

   (a) The throughput of natural gas delivered to the two (2) engines (CE-3 and CE-4) shall be limited to less than not exceed a total of 50.67 million cubic feet per twelve (12) consecutive month period with compliance to be determined at the end of each month.

   (b) NOx emissions from each engine (CE-3 and CE-4) shall not exceed 2,254.20 pounds per million cubic feet of natural gas combusted.

   (bc) CO emissions from each engine (CE-3 and CE-4) shall not exceed 3,794.40 pounds per million cubic feet of natural gas combusted.

   (cd) Pursuant to FESOP 063-6137-00018, issued on December 9, 1996, the two (2) engines (CE-3 and CE-4) shall use natural gas only.

   Compliance with these limits, combined with the potential to emit NOx and CO from all other emission units at this source, shall limit the source-wide total potential to emit of NOx and CO emissions to less than one hundred (100) tons per year, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable to the source.

...
Where:

\[
\begin{align*}
E_{\text{NOx}} &= \text{NOx Emissions (lbs NOx/MMCF)} \\
H &= \text{Higher Heating Value (1,020 MMBtu/MMCF)} \\
F_{\text{NOx}} &= \text{NOx Emission factor for natural gas powered reciprocating internal combustion engines (2.21 lbs NOx/MMBtu)} \\
\end{align*}
\]

HHV and Emission Factor are from AP-42 (Supplement F, July 2000), Table 3.2-3

(b) Compliance with CO emission limits contained in Condition D.1.1(bc) shall be determined using the following equation:

\[
E_{\text{CO}} = H \times F_{\text{CO}}
\]

Where:

\[
\begin{align*}
E_{\text{CO}} &= \text{CO Emissions (lbs CO/MMCF)} \\
H &= \text{High Heat Higher Heating Value (1,020 MMBtu/MMCF)} \\
F_{\text{CO}} &= \text{CO Emission factor for natural gas powered reciprocating internal combustion engines (3.72 lbs CO/MMBtu)} \\
\end{align*}
\]

CO Emission Factor is

HHV and Emission Factor are from AP-42 (Supplement F, July 2000), Table 3.2-3

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

D.1.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records of the natural gas delivered to the two (2) engines (CE-3 and CE-4). The Permittee shall maintain records in accordance with (1) and (2) through (3) below. Records maintained for (1) and (2) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the NOx and CO emissions limits established in Condition D.1.1.

(1) The total amount of natural gas delivered to the two (2) engines (CE-3 and CE-4) each month; and

(2) Total NOx emissions from the two (2) engines (CE-3 and CE-4).

(23) CO emissions from the total of the two (2) engines (CE-3 and CE-4).

(b) ...

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

<table>
<thead>
<tr>
<th>Emissions Unit Description:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Insignificant Activities:</td>
</tr>
<tr>
<td>(b) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour (higher heating value (HHV)):</td>
</tr>
<tr>
<td>(1) One (1) line heater, identified as FCU-01, installed in 1994 constructed in 2014, with a maximum heat input capacity of 2.00 4.00 MMBtu, and exhausting outdoors (higher heating value (HHV)).</td>
</tr>
</tbody>
</table>
One (1) line heater, identified as FCU-03, installed in 1994, with a maximum heat input capacity of 0.50 MMBtu/hr, and exhausting outdoors (higher heating value (HHV)).

One (1) pipeline utility heater, identified as FCU-04, permitted in 2017, with a maximum heat input capacity of 5.00 MMBtu/hr, using no controls and exhausting to stack S/V-06.

One (1) natural gas-fired comfort heater, identified as CH-01, approved in 2019 for construction, with a maximum heat input capacity of 0.40 MMBtu/hr, and exhausting outdoors.

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

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

D.2.1 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Unit ID</th>
<th>Pt (lb/MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>line heater</td>
<td>FCU-01</td>
<td>0.6</td>
</tr>
<tr>
<td>line heater</td>
<td>FCU-03</td>
<td>0.6</td>
</tr>
<tr>
<td>pipeline utility heater</td>
<td>FCU-04</td>
<td>0.6</td>
</tr>
<tr>
<td>comfort heater</td>
<td>CH-01</td>
<td>0.6</td>
</tr>
</tbody>
</table>

...

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-82, for the emission unit(s) listed above:

(a) Two (2) 650 brake horsepower four (4) cycle natural gas-fired, rich burn, naturally aspirated reciprocating internal combustion engines with natural gas compressors, identified as CE-3 and CE-4:

1. 40 CFR 63.6580
2. 40 CFR 63.6585
3. 40 CFR 63.6590(a)(1)(iii) and (iv)
4. 40 CFR 63.6595(a)(1), (b), and (c)
5. 40 CFR 63.6603(a) and (f)
6. 40 CFR 63.6605
7. 40 CFR 63.6612
8. 40 CFR 63.6620(a), (d), (e), (f), (g), (h), and (i)
9. 40 CFR 63.6625(e)(10) and (h)
10. 40 CFR 63.6630 (a), (b), (c), (d), and (e)
11. 40 CFR 63.6635
12. 40 CFR 63.6640(a), (b), (c), and (e)
13. 40 CFR 63.6645(a)(2), (g), and (h)
14. 40 CFR 63.6650
15. 40 CFR 63.6655
16. 40 CFR 63.6660
17. 40 CFR 63.6665
18. 40 CFR 63.6670
19. 40 CFR 63.6675
20. Table 2d (item 11 and 12)
21. Table 4
22. Table 5 (item 13 and 14)
23. Table 6 (item 15)
24. Table 7 (item 3)
25. Table 8
26. Appendix A

(b) One (1) gasoline emergency generator, identified as EG-01:

1. 40 CFR 63.6580
2. 40 CFR 63.6585
3. 40 CFR 63.6590(a)(1)(iii) and (iv)
4. 40 CFR 63.6595(a)(1), (b), and (c)
5. 40 CFR 63.6603(a)
6. 40 CFR 63.6605
7. 40 CFR 63.6625(e)(3), (f), (h), and (j)
8. 40 CFR 63.6635
9. 40 CFR 63.6640(a), (b), (e), (f)(1), (f)(2)(i), f(3), and f(4)
10. 40 CFR 63.6645(a)(5)
11. 40 CFR 63.6650
12. 40 CFR 63.6655
13. 40 CFR 63.6660
14. 40 CFR 63.6665
15. 40 CFR 63.6670
16. 40 CFR 63.6675
17. Table 2d (item 5)
18. Table 6 (item 9)
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  

FESOP Quarterly Report

Source Name: Vectren Corporation, d.b.a. Indiana Gas Company, Incorporated, Hendricks Count Junction  
Source Address: 7955 East Maloney Road, Brownsburg, Indiana 46112  
FESOP Permit No.: F063-39041-00018  
Facility: Two (2) engines (CE-3 and CE-4)  
Parameter: Natural gas throughput  
Limit: The throughput of natural gas delivered to the two (2) engines (CE-3 and CE-4) shall not exceed a total of less than 50.67 million cubic feet per twelve (12) consecutive month period, total  

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on October 21, 2019.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 063-42096-00018. The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Doug Logan, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-5328 or (800) 451-6027, and ask for Doug Logan or (317) 234-5328.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
Appendix A: Emission Calculations

PTE Summary

**Company Name:** Vectren Corporation, Hendricks County Junction  
**Source Address:** 7955 East Maloney Road, Brownsburg, Indiana 46112  
**SPR Number:** 063-42096-00018  
**Reviewer:** Doug Logan  
**Date:** 11/8/2019

### Uncontrolled Potential to Emit\(^1\) (tons/yr)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM(_{10})</th>
<th>PM(_{2.5})</th>
<th>SO(_2)</th>
<th>NO(_x)</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Compressor Engines (CE-3 and CE-4)</td>
<td>0.41</td>
<td>0.84</td>
<td>0.84</td>
<td>2.54E-02</td>
<td>95.64</td>
<td>1.28</td>
<td>160.98</td>
<td>1.39</td>
</tr>
<tr>
<td>Emergency Generator</td>
<td>1.98E-02</td>
<td>1.98E-02</td>
<td>1.98E-02</td>
<td>1.63E-02</td>
<td>0.30</td>
<td>0.55</td>
<td>0.19</td>
<td>-</td>
</tr>
<tr>
<td>Natural gas combustion</td>
<td>8.08E-02</td>
<td>0.32</td>
<td>0.32</td>
<td>2.55E-02</td>
<td>4.25</td>
<td>0.23</td>
<td>3.57</td>
<td>8.02E-02</td>
</tr>
<tr>
<td>Fugitives</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.27</td>
<td>-</td>
<td>-</td>
<td>8.06E-03</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>0.51</td>
<td>1.18</td>
<td>1.18</td>
<td>6.72E-02</td>
<td>100.19</td>
<td>2.33</td>
<td>164.74</td>
<td>1.48</td>
</tr>
</tbody>
</table>

**Notes:**
1. Fugitive emissions of criteria pollutants are not included in determining Part 70 and PSD applicability. Fugitive HAP emissions are always included in determining Part 70 applicability.
2. PM\(_{2.5}\) listed is direct PM\(_{2.5}\)

### Potential to Emit after Issuance\(^1\) (tons/yr)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM(_{10})</th>
<th>PM(_{2.5})</th>
<th>SO(_2)</th>
<th>NO(_x)</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Compressor Engines (CE-3 and CE-4)</td>
<td>0.41</td>
<td>0.84</td>
<td>0.84</td>
<td>2.54E-02</td>
<td>57.11</td>
<td>1.28</td>
<td>96.13</td>
<td>1.39</td>
</tr>
<tr>
<td>Emergency Generator</td>
<td>1.98E-02</td>
<td>1.98E-02</td>
<td>1.98E-02</td>
<td>1.63E-02</td>
<td>0.30</td>
<td>0.55</td>
<td>0.19</td>
<td>-</td>
</tr>
<tr>
<td>Natural gas combustion</td>
<td>8.08E-02</td>
<td>0.32</td>
<td>0.32</td>
<td>2.55E-02</td>
<td>4.25</td>
<td>0.23</td>
<td>3.57</td>
<td>8.02E-02</td>
</tr>
<tr>
<td>Fugitives</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.27</td>
<td>-</td>
<td>-</td>
<td>8.06E-03</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>0.51</td>
<td>1.18</td>
<td>1.18</td>
<td>6.72E-02</td>
<td>61.66</td>
<td>2.33</td>
<td>99.89</td>
<td>1.48</td>
</tr>
</tbody>
</table>

**Notes:**
1. Shaded cells indicate where limits are included
2. PM\(_{2.5}\) listed is direct PM\(_{2.5}\)
Appendix A: Emissions Calculations

Natural Gas Combustion Only

Company Name: Vectren Corporation, Hendricks County Junction
Source Address: 7955 East Maloney Road, Brownsburg, Indiana 46112
SPR Number: 063-42096-00018
Reviewer: Doug Logan
Date: 11/8/2019

This tab includes the new equipment permitted in in AA 063-42096-000188 for the purpose of determining the modification level. The units are also included in the "Natural Gas Combustion" tab.

1. Unit Description

<table>
<thead>
<tr>
<th>Description</th>
<th>Number</th>
<th>Unit</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>line heater - FCU-01</td>
<td>1</td>
<td>4.00</td>
<td>4.00</td>
</tr>
<tr>
<td>comfort heater - CH-01</td>
<td>1</td>
<td>0.40</td>
<td>0.40</td>
</tr>
</tbody>
</table>

2. Emissions Calculations

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>FCU-01 PTE (tons/yr)</td>
<td>3.26E-02</td>
<td>0.13</td>
<td>0.13</td>
<td>1.03E-02</td>
<td>1.72</td>
<td>9.45E-02</td>
<td>1.44</td>
</tr>
<tr>
<td>CH-01 PTE (tons/yr)</td>
<td>3.26E-03</td>
<td>1.31E-02</td>
<td>1.31E-02</td>
<td>1.03E-03</td>
<td>0.17</td>
<td>9.45E-03</td>
<td>0.14</td>
</tr>
<tr>
<td>Total</td>
<td>3.59E-02</td>
<td>0.14</td>
<td>0.14</td>
<td>1.13E-02</td>
<td>1.89</td>
<td>0.10</td>
<td>1.59</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

HMMbtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

PTE (tons/yr) = Heat Input Capacity (HMMbtu/hr) x 8,760 (hr/yr) / HHV (HMMbtu/MMCF) x Emission Factor (lb/MMCF) / 2,000 (lb/ton)

Hazardous Air Pollutants (HAPs)

**HAPs - Organics**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
</tr>
</thead>
<tbody>
<tr>
<td>FCU-01 PTE (tons/yr)</td>
<td>3.61E-05</td>
<td>2.06E-05</td>
<td>1.29E-03</td>
<td>3.09E-02</td>
<td>5.84E-05</td>
</tr>
<tr>
<td>CH-01 PTE (tons/yr)</td>
<td>3.61E-06</td>
<td>2.06E-06</td>
<td>1.29E-04</td>
<td>3.09E-03</td>
<td>5.84E-06</td>
</tr>
</tbody>
</table>

**HAPs - Metals**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
</tr>
</thead>
<tbody>
<tr>
<td>FCU-01 PTE (tons/yr)</td>
<td>5.08E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
</tr>
<tr>
<td>CH-01 PTE (tons/yr)</td>
<td>8.59E-06</td>
<td>1.89E-05</td>
<td>2.40E-05</td>
<td>6.53E-06</td>
<td>3.61E-05</td>
</tr>
</tbody>
</table>

Methodology is the same as above.
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
1. Unit Description

<table>
<thead>
<tr>
<th>Description</th>
<th>Capacity (hp)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CE-3</td>
<td>650</td>
</tr>
<tr>
<td>CE-4</td>
<td>650</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1300</strong></td>
</tr>
</tbody>
</table>

2. Uncontrolled Potential to Emit

| Maximum Output Horsepower Rating (hp) | 1300          |
| Brake Specific Fuel Consumption (BSFC) (Btu/hp-hr) | 7600          |
| Maximum Hours Operated per Year (hr/yr) | 8760          |
| Potential Fuel Usage (MMBtu/yr) | 86549          |
| High Heat Value (MMBtu/MMscf) | 1020          |
| Potential Fuel Usage (MMcf/yr) | 84.85         |

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (lb/MMBtu)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>9.50E-03</td>
<td>0.41</td>
</tr>
<tr>
<td>PM10*</td>
<td>1.94E-02</td>
<td>0.84</td>
</tr>
<tr>
<td>PM2.5</td>
<td>5.88E-04</td>
<td>5.84</td>
</tr>
<tr>
<td>SO2</td>
<td>5.54E-02</td>
<td>0.84</td>
</tr>
<tr>
<td>NOx</td>
<td>2.21E+00</td>
<td>2.54E-02</td>
</tr>
<tr>
<td>VOC</td>
<td>2.96E-02</td>
<td>95.64</td>
</tr>
<tr>
<td>CO</td>
<td>3.72E+00</td>
<td>1.28</td>
</tr>
<tr>
<td></td>
<td></td>
<td>160.98</td>
</tr>
</tbody>
</table>

*PM emission factor is for filterable PM-10. PM10 emission factor is filterable PM10 + condensable PM. PM2.5 emission factor is filterable PM2.5 + condensable PM.

Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (lb/MMBtu)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acetaldehyde</td>
<td>2.79E-03</td>
<td>0.12</td>
</tr>
<tr>
<td>Acrolein</td>
<td>2.63E-03</td>
<td>0.11</td>
</tr>
<tr>
<td>Benzene</td>
<td>1.58E-03</td>
<td>6.84E-02</td>
</tr>
<tr>
<td>1,3-Butadiene</td>
<td>6.63E-04</td>
<td>2.87E-02</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>2.05E-02</td>
<td>0.89</td>
</tr>
<tr>
<td>Methanol</td>
<td>3.06E-03</td>
<td>0.13</td>
</tr>
<tr>
<td>Total PAH**</td>
<td>1.41E-04</td>
<td>6.10E-03</td>
</tr>
<tr>
<td>Toluene</td>
<td>5.58E-04</td>
<td>2.41E-02</td>
</tr>
<tr>
<td>Xylene</td>
<td>1.95E-04</td>
<td>8.44E-03</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td>1.39</td>
</tr>
</tbody>
</table>

HAP pollutants consist of the nine highest HAPs included in AP-42 Table 3.2-3.

**PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

Methodology

Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-3

Potential Fuel Usage (MMBtu/yr) = [Maximum Output Horsepower Rating (hp) * [Brake Specific Fuel Consumption (Btu/hp-hr)] * [Maximum Hours Operated per Year (hr/yr)] / [1000000 Btu/MMBtu]

Potential Emissions (tons/yr) = [Potential Fuel Usage (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2000 lb/ton]

3. Limited Potential to Emit

| Potential Fuel Usage (MMBtu/yr) | 5.1684         |
| High Heat Value (MMBtu/MMcf)    | 1029           |
| Potential Fuel Usage (MMcf/yr)  | 50.67          |

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (lb/MMBtu)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>6.51E-03</td>
<td>0.57</td>
</tr>
<tr>
<td>PM10*</td>
<td>1.96E-02</td>
<td>57.11</td>
</tr>
<tr>
<td>PM2.5</td>
<td>2.21E+00</td>
<td>96.13</td>
</tr>
<tr>
<td>SO2</td>
<td>2.96E-02</td>
<td>95.64</td>
</tr>
<tr>
<td>NOx</td>
<td>3.72E+00</td>
<td>1.28</td>
</tr>
<tr>
<td>VOC</td>
<td>160.98</td>
<td>160.98</td>
</tr>
<tr>
<td>CO</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*PM emission factor is for filterable PM-10. PM10 emission factor is filterable PM10 + condensable PM. PM2.5 emission factor is filterable PM2.5 + condensable PM.

Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (lb/MMBtu)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acetaldehyde</td>
<td>2.79E-03</td>
<td>0.12</td>
</tr>
<tr>
<td>Acrolein</td>
<td>2.63E-03</td>
<td>0.11</td>
</tr>
<tr>
<td>Benzene</td>
<td>1.58E-03</td>
<td>6.84E-02</td>
</tr>
<tr>
<td>1,3-Butadiene</td>
<td>6.63E-04</td>
<td>2.87E-02</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>2.05E-02</td>
<td>0.89</td>
</tr>
<tr>
<td>Methanol</td>
<td>3.06E-03</td>
<td>0.13</td>
</tr>
<tr>
<td>Total PAH**</td>
<td>1.41E-04</td>
<td>6.10E-03</td>
</tr>
<tr>
<td>Toluene</td>
<td>5.58E-04</td>
<td>2.41E-02</td>
</tr>
<tr>
<td>Xylene</td>
<td>1.95E-04</td>
<td>8.44E-03</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td>0.83</td>
</tr>
</tbody>
</table>
Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines - Gasoline Fuel
Output Rating (<=600 HP)
Maximum Input Rate (<=4.2 MMBtu/hr)

Company Name: Vectren Corporation, Hendricks County Junction
Source Address: 7955 East Maloney Road, Brownsburg, Indiana 46112
SPR Number: 063-42096-00018
Reviewer: Doug Logan
Date: 11/8/2019

1. Unit Description

<table>
<thead>
<tr>
<th>Unit</th>
<th>Capacity (hp)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EG-01</td>
<td>110</td>
</tr>
</tbody>
</table>

2. Emissions Calculation

<table>
<thead>
<tr>
<th>Output Horsepower Rating (hp)</th>
<th>110.0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximum Hours Operated per Year</td>
<td>500</td>
</tr>
<tr>
<td>Potential Throughput (hp-hr/yr)</td>
<td>55,000</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/hp-hr</td>
<td>7.21E-04</td>
<td>7.21E-04</td>
<td>7.21E-04</td>
<td>0.0006</td>
<td>0.0110</td>
<td>0.0199</td>
<td>0.0070</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>1.98E-02</td>
<td>1.98E-02</td>
<td>1.98E-02</td>
<td>1.63E-02</td>
<td>0.30</td>
<td>0.55</td>
<td>0.19</td>
</tr>
</tbody>
</table>

*PM and PM2.5 emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

Hazardous Air Pollutants (HAPs)

AP-42 Section 3.3 does not list HAP emission factors for gasoline engines.

Methodology
Emission Factors are from AP 42 (Supplement B 10/96, corrected 3/24/2009) Tables 3.3-1, 3.4-2, 3.4-3, and 3.4-4.

Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] * [Maximum Hours Operated per Year]
Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] * [Emission Factor (lb/hp-hr)] / [2,000 lb/ton]
Apprindix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Vectren Corporation, Hendricks County Junction
Source Address: 7955 East Maloney Road, Brownsburg, Indiana 46112
SPR Number: 063-42096-00018
Reviewer: Doug Logan
Date: 11/8/2019

1. Unit Description

<table>
<thead>
<tr>
<th>Description</th>
<th>Number</th>
<th>Unit</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>line heater - FCU-01</td>
<td>1</td>
<td>4.00</td>
<td>4.00</td>
</tr>
<tr>
<td>line heater - FCU-03</td>
<td>1</td>
<td>0.50</td>
<td>0.50</td>
</tr>
<tr>
<td>REX combustion - FCU-04</td>
<td>1</td>
<td>5.00</td>
<td>5.00</td>
</tr>
<tr>
<td>comfort heater - CH-01</td>
<td>1</td>
<td>0.40</td>
<td>0.40</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td>9.90</td>
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2. Emissions Calculations

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
<td>84</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>8.08E-02</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only.  PM10 emission factor is filterable and condensable PM10 combined.  PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx:  Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>8.93E-05</td>
<td>5.10E-05</td>
<td>3.19E-03</td>
<td>7.65E-02</td>
<td>1.45E-04</td>
<td>8.00E-02</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>2.13E-05</td>
<td>4.68E-05</td>
<td>5.95E-05</td>
<td>1.62E-05</td>
<td>8.93E-05</td>
<td>2.33E-04</td>
</tr>
</tbody>
</table>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Appendix A: Emissions Calculations

Fugitive Emissions

Company Name: Vectren Corporation, Hendricks County Junction
Source Address: 7955 East Maloney Road, Brownsburg, Indiana 46112
SPR Number: 063-42096-00018
Reviewer: Doug Logan
Date: 11/8/2019

Average Fugitive Emissions Component Count:

<table>
<thead>
<tr>
<th>Equipment</th>
<th>Model Plant Average Component Count per Equipment</th>
<th>Average Component Count per Model Plant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gas Wellheads</td>
<td>2 valves, 9.5 connectors, 0 OEL, 0 PRV</td>
<td>19 valves, 74 connectors, 1.4 OEL, 0 PRV</td>
</tr>
<tr>
<td>Separators</td>
<td>3 valves, 21.6 connectors, 3.7 OEL, 1.2 PRV</td>
<td>43.2 valves, 137 connectors, 7.4 OEL, 2.4 PRV</td>
</tr>
<tr>
<td>Meter/Piping</td>
<td>3 valves, 12.9 connectors, 0.5 OEL, 0.5 PRV</td>
<td>38.7 valves, 143.4 connectors, 1.5 OEL, 1.5 PRV</td>
</tr>
<tr>
<td>In-Line Heaters</td>
<td>2 valves, 14 connectors, 2 OEL, 1 PRV</td>
<td>26 valves, 130 connectors, 4 OEL, 2 PRV</td>
</tr>
<tr>
<td>Dehydrators</td>
<td>1 valve, 24 connectors, 2 OEL, 2 PRV</td>
<td>24 valves, 80 connectors, 2 OEL, 2 PRV</td>
</tr>
<tr>
<td>Rounded-up Total</td>
<td>153 valves, 575 connectors, 17 OEL, 8 PRV</td>
<td></td>
</tr>
</tbody>
</table>

Notes:
1. Source: Table 9-4, Control Techniques Guidelines for the Oil and Natural Gas Industry, EPA-453/B-16-001, October 2016
2. OEL - open ended line
3. PRV - pressure relief valve
4. Actual count of in-line heaters for the Hendrick County Junction compressor station.

1. VOC

<table>
<thead>
<tr>
<th>Component</th>
<th>Service Type</th>
<th>Component Count</th>
<th>Emission Factor (kg/hr/source)</th>
<th>VOC Content by weight</th>
<th>Potential to Emit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Compressor Station</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Valves</td>
<td>Gas/vapor</td>
<td>153</td>
<td>4.50E-03</td>
<td>2.51%</td>
<td>3.81E-02</td>
</tr>
<tr>
<td>Connectors</td>
<td>Gas/vapor</td>
<td>575</td>
<td>2.00E-04</td>
<td>2.51%</td>
<td>6.96E-03</td>
</tr>
<tr>
<td>Compressor seals</td>
<td>Gas/vapor</td>
<td>2</td>
<td>8.80E-03</td>
<td>2.51%</td>
<td>9.74E-04</td>
</tr>
<tr>
<td>Pressure relief valves</td>
<td>Gas/vapor</td>
<td>8</td>
<td>8.80E-03</td>
<td>2.51%</td>
<td>3.90E-03</td>
</tr>
<tr>
<td>Open ended lines</td>
<td>Gas/vapor</td>
<td>17</td>
<td>2.00E-03</td>
<td>2.51%</td>
<td>1.88E-03</td>
</tr>
<tr>
<td>Pressure relief valves</td>
<td>Gas/vapor</td>
<td>3</td>
<td>8.80E-03</td>
<td>2.51%</td>
<td>1.46E-03</td>
</tr>
<tr>
<td>Open ended lines</td>
<td>Gas/vapor</td>
<td>13</td>
<td>2.00E-03</td>
<td>2.51%</td>
<td>1.25E-03</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>6.20E-02</td>
</tr>
</tbody>
</table>

Notes:
1. Emission factors for TOC (including methane and ethane) from Table 2-4, Protocol for Equipment Leak Estimates, EPA-453/R-95-017.
2. VOC content for the transmission sector from Table 6, "Memorandum: Composition of Natural Gas for use in the Oil and Natural Gas Sector Rulemaking", H.P. Brown, ECR Inc., July 28, 2011, Docket ID EPA-HQ-OAR-2010-0505-0084.
3. Component count rounded up from average component counts for model plant in Table 9-4, Control Techniques Guidelines for the Oil and Natural Gas Industry, EPA-453/B-16-001, October 2016.
4. Default count of compressor seals taken as the number of prime movers.
5. Default count of meters taken as model plant equipment count, meter/piping
6. Component count rounded up from average component counts for meters/piping and in-line heaters in Table 9-4, Control Techniques Guidelines for the Oil and Natural Gas Industry, EPA-453/B-16-001, October 2016.

Methodology

\[
\text{PTE (lb/hr)} = \text{Component Count} \times \text{Emission Factor (kg/hr/source)} \times \text{VOC Content (%)/100} \times 2.205 \, \text{(lb/kg)}
\]

\[
\text{PTE (tons/yr)} = \text{PTE (lb/hr)} \times 8,760 \, \text{(hr/yr)} / 2,000 \, \text{(lb/ton)}
\]

2. Hazardous Air Pollutants

<table>
<thead>
<tr>
<th>HAP</th>
<th>HAP Weight Percent</th>
<th>Potential to Emit</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>(lb/hr)</td>
</tr>
<tr>
<td>Total</td>
<td>2.97%</td>
<td>1.84E-03</td>
</tr>
</tbody>
</table>

Notes:
1. Source, Table 6, 2011 Natural Gas Composition Memorandum, total HAP as weight fraction of VOC

Methodology

\[
\text{PTE (lb/hr)} = \text{Total VOC PTE (lb/hr)} \times \text{HAP Weight Percent(%)100}
\]

\[
\text{PTE (tons/yr)} = \text{PTE (lb/hr)} \times 8,760 \, \text{(hr/yr)} / 2,000 \, \text{(lb/ton)}
\]
December 2, 2019

Mr. Mark Wannemueller
Vectren Corporation
P.O. Box 209
Evansville, IN  47702-0209

Re: Public Notice
Vectren Corporation
Permit Level: FESOP – Significant Permit Revision
Permit Number: 063-42096-00018

Dear Mr. Wannemueller:

Enclosed is a copy of your draft FESOP – Significant Permit Revision, Technical Support Document, emission calculations, and the Public Notice.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Brownsburg Public Library, 450 S. Jefferson Street in Brownsburg, IN 46112. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Doug Logan, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5328 or dial (317) 234-5328.

Sincerely,

Vicki Biddle
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
December 2, 2019

To: Brownsburg Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

Applicant Name: Vectren Corporation dba Indiana Gas Company
Permit Number: 063-42096-00018

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019
Notice of Public Comment

December 2, 2019
Vectren Corporation dba Indiana Gas
063-42096-00018

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana’s Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.
**Mail Code 61-53**

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<th>Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204</th>
<th>Type of Mail: CERTIFICATE OF MAILING ONLY</th>
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</thead>
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<th>Rest. Del. Fee</th>
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<tbody>
<tr>
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<td>1</td>
<td>Mark Wannemueller Indiana Gas Company Inc dba Vectren A CenterPoint PO Box 209 Evansville IN 47702 (Source CAATS)</td>
<td></td>
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<tr>
<td>2</td>
<td>2</td>
<td>Richard Leger Vice President Indiana Gas Company Inc dba Vectren A CenterPoint PO Box 209 Evansville IN 47702 (RO CAATS)</td>
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<td>3</td>
<td>Brownsburg Brown and Lincoln Twp Library 450 S Jefferson St Brownsburg IN 46112-1310 (Library)</td>
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<tr>
<td>4</td>
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<td>Larry and Becky Bischoff 10979 North Smokey Row Road Mooresville IN 46158 (Affected Party)</td>
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<tr>
<td>5</td>
<td>5</td>
<td>Hendricks County Commissioners 355 S Washington Danville IN 46122 (Local Official)</td>
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<td></td>
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<tr>
<td>6</td>
<td>6</td>
<td>Betty Bartley P.O. Box 149 Danville IN 46122 (Affected Party)</td>
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<tr>
<td>7</td>
<td>7</td>
<td>Brownsburg Town Council and Town Manager 61 North Green Street Brownsburg IN 46112 (Local Official)</td>
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<tr>
<td>8</td>
<td>8</td>
<td>Hendricks County Health Department 355 S Washington Street, Suite G30 Danville IN 46122-1759 (Health Department)</td>
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<td></td>
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<tr>
<td>9</td>
<td>9</td>
<td>Kathy Linton The Lebanon Reporter 117 E Washington St Lebanon IN 46052 (Affected Party)</td>
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</tr>
<tr>
<td>10</td>
<td>10</td>
<td>Amal Agharkar Trinity Consultants, Inc. 1801 S Meyers Rd, Ste 350 Oakbrook Terrace IL 60181 (Consultant)</td>
<td></td>
<td></td>
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**Total number of Pieces Received at Post Office**: 10

**Postmaster, Per (Name of Receiving employee)**

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mill merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations on coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.