INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

October 25, 2018

Ms. Cathy Stepp
Regional Administrator
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3950

Dear Ms. Stepp:

Re: Indiana's Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision and Negative Declaration for the Oil and Natural Gas Industry Control Techniques Guidelines (CTGs)

The purpose of this letter is to provide United States Environmental Protection Agency (U.S. EPA) with a Negative Declaration regarding the Control Techniques Guidelines (CTGs) for the Oil and Natural Gas Industry issued October 20, 2016 (referred to hereafter as the Oil and Gas CTGs).[1]

Under sections 182 and 184 of the federal Clean Air Act (CAA), states must implement reasonably available control technology (RACT) to limit volatile organic compound emissions from sources covered by the Oil and Gas CTGs in ozone nonattainment areas classified as "moderate" or above for either the 2008 or the 2015 8-hour National Ambient Air Quality Standards.[2] States that are subject to RACT requirements must revise their state implementation plans (SIPs) to include their determinations for sources covered by the Oil and Gas CTGs. If a state confirms there are no covered sources within its jurisdiction, the state can submit a "negative declaration" to U.S. EPA certifying such.

Indiana has evaluated areas for which the Oil and Gas CTGs must be applied under the 2008 and the 2015 8-hour ozone standards. Under the 2008 ozone standard, Lake and Porter counties are designated as part of the Chicago-Naperville, IL-IN-WI Moderate Nonattainment Area; therefore, RACT is applicable for sources covered by the CTGs in Lake and Porter counties. No ozone nonattainment areas in Indiana are classified as moderate or above under the 2015 ozone standard; therefore, it is not necessary for Indiana to address the Oil and Gas CTGs for the 2015 ozone standard.

[1] 81 FR 74798, https://www.gpo.gov/fdsys/pkg/FR-2016-10-27/pdf/2016-25923.pdf.
[2] RACT is also applicable throughout the Ozone Transport Region, which does not include Indiana.

A search for covered sources in Lake and Porter counties shows that there are none at this time. Please refer to Enclosure 1, *Indiana's Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision and Negative Declaration for the Oil and Natural Gas Industry Control Techniques Guidelines (CTGs)*, which includes an evaluation of the search results.

IDEM provided a 30-day public comment period and an opportunity for a public hearing concerning this submittal. A public hearing was not requested. One party submitted an inquiry during the public comment period. Please refer to Enclosure 2, *Public Participation Process Documentation,* which includes IDEM's response, as well as further information and dates regarding the public participation process.

This submittal consists of one (1) hard copy of the required documentation. An electronic version of the submittal in PDF format that is identical to the hard copy has been sent to Mr. Doug Aburano, Chief of U.S. EPA Region 5's Attainment Planning and Maintenance Section, as well as Mr. Chris Panos of U.S. EPA Region 5.

IDEM requests that U.S. EPA proceed with review and approval of this submittal. If you have any questions concerning this submittal, please do not hesitate to contact Mr. Brian Callahan, Chief of the Air Quality Standards and Implementation Section in the Air Programs Branch of IDEM's Office of Air Quality, at (317) 233-8244 or bcallaha@idem.IN.gov.

Sincerely,

Keith Baugues

Keith Baugues
Assistant Commissioner

KB/sd/bc/gf/as
Enclosures:

1. *Indiana's Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision and Negative Declaration for the Oil and Natural Gas Industry Control Techniques Guidelines (CTGs)*
2. *Public Participation Process Documentation*

cc: Doug Aburano, U.S. EPA Region 5 (no enclosures)
Chris Panos, U.S. EPA Region 5 (no enclosures)
Steve Rosenthal, U.S. EPA Region 5 (no enclosures)
Scott Deloney, IDEM-OAQ (no enclosures)
Brian Callahan, IDEM-OAQ (w/enclosures)
Gale Ferris, IDEM-OAQ (w/enclosures)
Amy Smith, IDEM-OAQ (w/enclosures)
File Copy

Enclosure 1

Indiana's Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision and Negative Declaration for the Oil and Natural Gas Industry Control Techniques Guidelines (CTGs)

Submitted by the
Indiana Department of Environmental Management (IDEM)
October 2018

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1.0 Introduction

On October 20, 2016, United States Environmental Protection Agency (U.S. EPA) issued final Control Techniques Guidelines (CTGs) for the Oil and Natural Gas Industry (referred to hereafter as the Oil and Gas CTGs).[1] The document contains information to assist air agencies in determining Reasonably Available Control Technology (RACT) for volatile organic compound (VOC) emissions from select industry emission sources.

Under sections 182 and 184 of the federal Clean Air Act (CAA), states must implement RACT to limit VOC emissions from sources covered by the Oil and Gas CTGs in ozone nonattainment areas classified as "moderate" or above for the 2008 8-hour National Ambient Air Quality Standards.[2] The Oil and Gas CTGs do not impose legal requirements directly on emission sources but provide recommendations for air agencies to consider in determining emissions limits for covered sources in order to meet RACT requirements. States that are subject to RACT requirements must revise their state implementation plans (SIPs) to include their determinations for sources covered by the Oil and Gas CTGs. If a state confirms there are no covered sources within their jurisdiction, the state can submit a "Negative Declaration" to U.S. EPA certifying such. The RACT determination and/or Negative Declaration should be submitted within two years from the effective date of the designation or as specified in the final rule for the new CTG.

Because Indiana has areas designated moderate or above, an assessment of the impact of the Oil and Gas CTGs must be performed. Indiana has determined that no emissions sources exist within Indiana that are covered by the Oil and Gas CTGs. As such, this document is Indiana's Negative Declaration based on the following evaluation.

2.0 Background

2.1 Affected Areas

The Indiana Department of Environmental Management (IDEM) has determined that Lake and Porter counties are the only areas of Indiana affected under the Oil and Gas CTGs. Lake and Porter counties are part of the Chicago-Naperville, IL-IN-WI Moderate Nonattainment Area for the 2008 8-hour ozone standard.

2.2 Covered Emissions Sources and Recommended RACT

The Oil and Gas CTGs include RACT recommendations for storage tanks, centrifugal and reciprocating compressors, pneumatic controllers and pumps, and

[1] 81 FR 74798, https://www.gpo.gov/fdsys/pkg/FR-2016-10-27/pdf/2016-25923.pdf.

[2] The requirement also applies for states in the Ozone Transport Region, which encompasses 11 northeast states and a metropolitan statistical area including Washington D.C. and portions of northern Virginia.

equipment leaks from natural gas processing plants, as well as VOC leaks at gathering and boosting stations and oil and natural gas well sites. Requirements are also established for storage tanks, pneumatic controllers and pneumatic pumps at low-producing well sites. Requirements are not included for completions and recompletions of hydraulically fractured wells because they are covered under New Source Performance Standards for the oil and natural gas industry. Complete details are provided in U.S. EPA's final Control Techniques Guidelines for the Oil and Natural Gas Industry.[3] Table 1 contains U.S. EPA's summary of covered sources and RACT recommendations.[4]

[3] Found at https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry.

[4] Found at https://www.epa.gov/sites/production/files/2016-10/documents/table-covered-sources-oil-and-gas-ctg.pdf.

Table 1: U.S. EPA Summary of Final VOC Control Techniques Guidelines for the Oil and Natural Gas Industry and RACT Recommendations

Sources Covered	Reasonably Available Control Technology (RACT) Recommendation
Storage Tanks	
• Individual storage tanks with a potential to emit (PTE) ≥ 6 tons per year (tpy) of VOCs.	• 95% reduction of VOC emissions • If owner/operators demonstrate that actual VOC emissions without controls are less than 4 tpy, as determined monthly, for 12 consecutive months, 95% control no longer required, provided uncontrolled VOC emissions remain below 4 tpy.
Pneumatic Controllers	
• Individual continuous bleed, natural gas-driven pneumatic controller at a natural gas processing plant.	• Natural gas bleed rate of zero standard cubic feet per hour (scfh). Some exceptions for functional needs including, but not limited to, response time, safety and positive actuation that require higher bleed rate.
• Individual continuous bleed natural gas-driven pneumatic controller located from the wellhead to the natural gas processing plant or point of custody transfer to an oil pipeline.	• Natural gas bleed rate ≤ 6 scfh. Some exceptions for functional needs including, but not limited to, response time, safety and positive actuation that require higher bleed rate.
Pneumatic Pumps	
• Individual natural gas-driven diaphragm pump located at a natural gas processing plant.	• Zero VOC emissions.
• Individual natural gas-driven diaphragm pump located at a well site.	• Require routing of VOC emissions from the pump to an existing onsite control device/process. • Require 95% control, unless the onsite existing control device/process cannot achieve 95%. If onsite existing device/process cannot achieve 95%, maintain documentation demonstrating the percent reduction the control device is designed to achieve. • Maintain records if there is no existing control device at the location of the pump.
• Individual natural gas-driven diaphragm pump located at a well site that is in operation for any period of time each calendar day for less than a total of 90 days per calendar year.	Not covered; RACT would not apply.

Table 1 (Cont'd)	
Sources Covered	**Reasonably Available Control Technology (RACT) Recommendation**
Compressors (Centrifugal & Reciprocating)	
• Individual reciprocating compressor located between the wellhead and point of custody transfer to the natural gas transmission and storage segment.	• Reduce VOC emissions by replacing reciprocating compressor rod packing on or before 26,000 hours of operation or 36 months since the most recent rod packing replacement. • Alternatively, route rod packing emissions to a process through a closed vent system under negative pressure.
• Individual reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site.	Not covered; RACT would not apply.
• Individual centrifugal compressor using wet seals that is located between the wellhead and point of custody transfer to the natural gas transmission and storage segment.	• Reduce VOC emissions from each centrifugal compressor wet seal fluid gassing system by 95%.
• Individual centrifugal compressor using wet seals located at a well site, or an adjacent well site and serving more than one well site.	Not covered; RACT would not apply.
• Individual centrifugal compressor using dry seals.	Not covered; RACT would not apply.
Leaks (Equipment Leaks and Fugitive Emissions)	
• Equipment leaks from components in VOC service located at a natural gas processing plant.	• Implement the 40 CFR part 60, subpart VVa leak detection and repair (LDAR) program for natural gas processing plants.
• Fugitive emissions (leaks) from individual well sites with wells with a gas-to-oil ratio (GOR) ≥ 300 that produce, on average, > 15 barrel of oil equivalents per well per day.	• Develop and implement semiannual optical gas imaging (OGI) monitoring and repair plan covering fugitive emissions components within a company-defined area. • Method 21 can be used as an alternative to OGI at a 500 ppm repair threshold level.
• Fugitive emissions (leaks) at individual gathering & boosting stations located from the wellhead to the point of custody transfer to the natural gas transmission and storage segment, or an oil pipeline.	• Develop and implement a quarterly OGI monitoring and repair plan that covers the collection of fugitive emissions components at gathering and boosting stations within a company-defined area. • Method 21 can be used as an alternative to OGI at a 500 ppm repair threshold.

3.0 RACT Determination

IDEM searched Indiana's oil and gas well records and air permit records and evaluated potentially affected emissions sources before determining that no covered sources exist in Lake or Porter counties.

3.1 Oil and Natural Gas Well Records Search Results

The Indiana Department of Natural Resources (IDNR) Division of Oil and Gas administers Indiana's oil and gas statutes and regulates petroleum exploration and production operations including: well spacing, exploration, permitting, drilling, completion, production, and abandonment operations; underground injection of fluids for enhanced oil recovery or for production fluid disposal; and the underground storage of natural gas or other petroleum products in underground formations. The Division of Oil and Gas is Indiana's primary point of contact for oil and gas records, and it maintains Indiana's database of well records.

IDEM conducted a thorough search of permitted oil and natural gas wells in Lake and Porter counties using IDNR's online permits database.[5] The search results showed no active oil or gas production wells exist in Lake or Porter counties.

3.2 Air Permits Database Search Results

IDEM is Indiana's air permitting authority. IDEM conducted a search of Indiana's air permit database to identify potentially affected emissions sources in Lake and Porter counties. SIC codes were reviewed to identify potentially affected establishments, as shown in Table 2.[6]

[5] https://www.in.gov/dnr/dnroil/5447.htm.

[6] Compiled using the U.S. Occupational Safety and Health Administration (OSHA) Standard Industrial Classification Search tool, https://www.osha.gov/pls/imis/sicsearch.html.

Table 2: SIC Codes for Oil and Natural Gas Production

SIC Code	Description
1311	Crude Petroleum and Natural Gas: Establishments primarily engaged in operating oil and gas field properties
1321	Natural Gas Liquids: Establishments primarily engaged in producing liquid hydrocarbons from oil and gas field gases
1381	Drilling Oil and Gas Wells: Establishments primarily engaged in drilling wells for oil or gas field operations for others on a contract or fee basis
1382	Oil and Gas Exploration Services: Establishments primarily engaged in performing geophysical, geological, and other exploration services for oil and gas on a contract or fee basis
1389	Oil and Gas Field Services, Not Elsewhere Classified: Establishments primarily engaged in performing oil and gas field services, not elsewhere classified, for others on a contract or fee basis
4922	Natural Gas Transmission: Establishments engaged in the transmission and/or storage of natural gas for sale
4923	Gas Transmission and Distribution: Establishments engaged in both the transmission and distribution of natural gas for sale
4924	Natural Gas Distribution: Establishments engaged in the distribution of natural gas for sale
4925	Gas Production and/or Distribution: Establishments engaged in the manufacture and/or distribution of gas for sale, including mixtures of manufactured with natural gas

No covered emissions sources were identified in Porter County. Three facilities in Lake County were identified and selected for further evaluation based on their reported SIC codes and descriptions. They include:

- Northern Indiana Public Service Company LLC-North Hayden Substation, which lists SIC 4923 and is described as a stationary natural gas transmission and distribution facility,
- Northern Indiana Public Service Company LLC-Vector Crown Point Substation, which lists SIC 4924 and is described as a natural gas fired pipeline heater, and
- ANR Pipeline Company-St. John Station, which lists SIC 4922 and is described as a stationary natural gas compressor station.

Based on further review of the emissions sources at these permitted facilities, RACT requirements are determined not to be applicable, as shown in Table 3.

Table 3: Source Applicability Evaluations

Northern Indiana Public Service Company LLC-North Hayden Substation, State Line Road & 185th Avenue, North Hayden, IN, Permit 38526	**Northern Indiana Public Service Company LLC-Vector Crown Point Substation, 91st Avenue & Chase Street, Crown Point, IN, Permit 14055**	**ANR Pipeline Company-St. John Station, 10313 White Oak Avenue, Saint John, IN, Permit 32576**
The source has no storage tank(s). RACT requirement for storage vessels does not apply.	The source has no storage tank(s). RACT requirement for storage vessels does not apply.	The source has one condensate storage tank with a PTE of 0.35 tpy VOC. RACT applies for storage vessels equal to or greater than 6 tpy VOC. Therefore, RACT requirement for storage vessels does not apply.
The source is not a natural gas processing plant. Listed emissions sources do not indicate wells at the site or pneumatic controllers. RACT requirement for pneumatic controllers does not apply.	The source is not a natural gas processing plant. Listed emissions sources do not indicate wells at the site or pneumatic controllers. RACT requirement for pneumatic controllers does not apply.	The source is not a natural gas processing plant. Listed emissions sources do not indicate wells at the site or pneumatic controllers. RACT requirement for pneumatic controllers does not apply.
The source is not a natural gas processing plant. Listed emissions sources do not include wells at this site. RACT requirement for pneumatic pumps does not apply.	The source is not a natural gas processing plant. Listed emissions sources do not include wells at the site. RACT requirement for pneumatic pumps does not apply.	The source is not a natural gas processing plant. Listed emissions sources do not indicate wells at the site. RACT requirement for pneumatic pumps does not apply.
Listed emissions sources do not include reciprocating and/or centrifugal compressors. RACT requirement for compressors does not apply.	Listed emissions sources do not include reciprocating or centrifugal compressors. RACT requirement for compressors does not apply.	Emissions sources include seven (7) reciprocating compressors to drive product movement through the pipeline system. Listed emissions sources do not indicate wells at the site. There is no indication of compressors located between a wellhead and point of custody transfer to natural gas transmission and storage segment. RACT requirement for compressors does not apply.
The source is not a natural gas processing plant. RACT requirement for equipment leaks does not apply.	The source is not a natural gas processing plant. RACT requirement for equipment leaks does not apply.	The source is not a natural gas processing plant. RACT requirement for equipment leaks does not apply.
Listed emissions sources do not indicate wells at the site, or individual gathering and boosting stations located from a wellhead to a point of custody transfer to a natural gas transmission and storage segment point of custody transfer to an oil pipeline. RACT requirement for fugitive emissions does not apply.	Listed emissions sources do not indicate wells at the site, or individual gathering and boosting stations located from a wellhead to a point of custody transfer to a natural gas transmission and storage segment point of custody transfer to an oil pipeline. RACT requirement for fugitive emissions does not apply.	Listed emissions sources do not indicate wells at the site, or individual gathering and boosting stations located from a wellhead to a point of custody transfer to a natural gas transmission and storage segment point of custody transfer to an oil pipeline. RACT requirement for fugitive emissions does not apply.

4.0 Conclusion and Negative Declaration

Lake and Porter counties are part of the Chicago-Naperville, IL-IN-WI Moderate Nonattainment Area for the 2008 8-hour ozone standard. As such, emissions sources located within the nonattainment area are covered by the Oil and Gas CTGs and subject to RACT requirements. IDEM conducted a thorough search of Indiana's oil and gas well records and air permits database to identify existing emissions sources in Lake and Porter counties and make a RACT determination. No active oil or gas production wells are located in Lake or Porter counties. IDEM reviewed Indiana's air permits database to identify affected emissions sources by industry categories and equipment/process descriptions and selected emissions sources for applicability evaluations. No covered permitted facilities are located in Porter County. Three permitted facilities in Lake County were selected for further evaluation based on reported industry categories and descriptions. It was determined that RACT requirements do not apply. It is therefore concluded that no covered sources exist in Indiana.

Indiana is therefore submitting a Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision and Negative Declaration for the Oil and Natural Gas Industry Control Techniques Guidelines (CTGs).

Enclosure 2

Public Participation Process Documentation

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LEGAL NOTICE OF PUBLIC HEARING

Indiana's Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision and Negative Declaration for the Oil and Natural Gas Industry Control Techniques Guidelines (CTGs)

Note: Legal notices for public hearings are no longer published in newspapers, but can be found on the Indiana Department of Environmental Management's (IDEM's) website at: http://www.IN.gov/idem/5474.htm

Notice is hereby given under Title 40, Part 51.102 of the Code of Federal Regulations (40 CFR 51.102) that the Indiana Department of Environmental Management (IDEM) is accepting written comment and providing an opportunity for public hearing regarding *Indiana's Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision and Negative Declaration for the Oil and Natural Gas Industry Control Techniques Guidelines (CTGs).* All interested persons are invited and will be given reasonable opportunity to express their views concerning the submittal.

The purpose of this notice is to solicit public comment on *Indiana's Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision and Negative Declaration for the Oil and Natural Gas Industry Control Techniques Guidelines (CTGs)*. On October 20, 2016, United States Environmental Protection Agency (U.S. EPA) issued Control Techniques Guidelines (CTGs) for the Oil and Natural Gas Industry (referred to hereafter as the Oil and Gas CTGs). States that are subject to RACT requirements must revise their state implementation plans (SIPs) to include their determinations for sources covered by the Oil and Gas CTGs. If a state confirms there are no covered sources within its jurisdiction, the state can submit a "negative declaration" to U.S. EPA certifying such. Indiana has prepared this RACT SIP revision and negative declaration based on a determination that no emissions sources are covered by the Oil and Gas CTGs.

Copies of the draft documents will be available on or before Friday, September 21, 2018, to any person upon request and at the following locations:

- Indiana Department of Environmental Management, Office of Air Quality, Indiana Government Center North, 100 North Senate Avenue, Room N1003, Indianapolis, Indiana
- Lake Station-New Chicago Branch of the Lake County Public Library, 2007 Central Avenue, Lake Station, Indiana
- Merrillville Branch of the Lake County Public Library, 1919 81st Avenue, Merrillville, Indiana
- Valparaiso Public Library, 103 Jefferson Street, Valparaiso, Indiana

The draft documents will also be available on the following web page:

https://www.in.gov/idem/airquality/2433.htm

Any person may submit written comments on *Indiana's Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision and Negative Declaration for the Oil and Natural Gas Industry Control Techniques Guidelines (CTGs)* on or before Monday, October 22, 2018. Written comments should be directed to Ms. Amy Smith, Office of Air Quality, N1003, Indiana Department of Environmental Management, 100 North Senate Avenue, Indianapolis, Indiana 46204; or fax (317) 233-5967; or email at amsmith@idem.IN.gov. A public hearing on *Indiana's Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision and Negative Declaration for the Oil and Natural Gas Industry Control Techniques Guidelines (CTGs)* will be held if a public hearing request is received by Monday, October 22, 2018. Interested parties may also present oral or written comments at the public hearing, if held. Oral statements will be heard, but for the accuracy of the record, statements should be submitted in writing. Written statements may be submitted to the attendant designated to receive written comments at the public hearing, if held.

If a hearing is requested, the hearing will be held on Tuesday, October 30, 2018, and the public comment period will be extended to Wednesday, November 7, 2018. If a hearing is held, it will convene at 6:00 p.m. (local time) at the Merrillville Branch of the Lake County Public Library, Meeting Room C, 1919 West 81st Avenue, Merrillville, Indiana 46410. If a request for a public hearing is not received by Monday, October 22, 2018, the hearing will be cancelled. Interested parties can check the online IDEM calendar at http://www.in.gov/activecalendar/EventList.aspx or contact Ms. Amy Smith at (317) 233-8211, after Monday, October 22, 2018, to see if the hearing has been cancelled or will convene.

If a hearing is held, a transcript of the hearing and all written submissions provided at the public hearing shall be open to public inspection at IDEM and copies may be made available to any person upon payment of reproduction costs. Any person heard or represented at the hearing or requesting notice shall be given written notice of actions resulting from the hearing.

For additional information contact Ms. Amy Smith, at the Indiana Department of Environmental Management, Office of Air Quality, Room N1003, Indiana Government Center North, 100 North Senate Avenue, Indianapolis, IN 46204 or call (317) 233-8211 or (800) 451-6027, ext. 3-8211 (in Indiana).

****

Speech and hearing impaired callers may contact the agency via the Indiana Relay Service at 1-800-743-3333. Individuals requiring reasonable accommodations for participation in this hearing, if held, should contact the IDEM Americans with Disabilities Act (ADA) coordinator at:

Attn: ADA Coordinator
Indiana Department of Environmental Management – Mail Code 50-10
100 North Senate Avenue
Indianapolis, IN 46204-2251

Or call (317) 233-1785 (voice) or (317) 232-6565 (TDD).
Please provide a minimum of 72 hours notification.

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

September 17, 2018

CERTIFICATE OF PUBLICATION

This is to certify that the Indiana Department of Environmental Management (IDEM) Notice of the opportunity for a Public Hearing regarding the following:

- Draft Indiana's Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision and Negative Declaration for the Oil and Natural Gas Industry Control Techniques Guidelines (CTGs)

was published on IDEM's web site on September 17, 2018. It is expected that it will remain posted on the site until at least October 23, 2018.

The notice in full was available online at the following web address, under "Northwestern":
http://www.in.gov/idem/5474.htm

The draft document was also posted online September 17, 2018 at the following web address:
https://www.in.gov/idem/airquality/2433.htm

Web publication of the notice was at the request of Scott Deloney, Branch Chief, Programs Branch, Office of Air Quality, IDEM.

By:

Mike Finklestein
IDEM Webmaster

Attachments:
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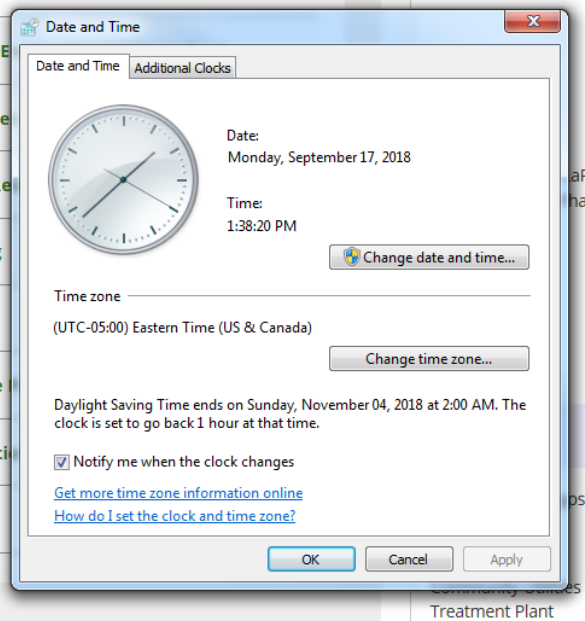

Public Notices: Northwestern Region

Name or Facility	Type of Notice/Event	Publication Dates	Public Comment?	Additional Information
Multi-County Notices				
Draft Indiana's Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision and Negative Declaration for the Oil and Natural Gas Industry Control Techniques Guidelines (CTGs)	Legal Notice and Opportunity for Public Hearing [PDF]	09/22/2018 - 10/22/2018	Yes	Counties: Lake and Porter Program Manager: Amy Smith Additional information is available on the IDEM Air Quality in Indiana: Ozone Attainment Demonstrations page
Buckeye Pipeline Company LP	Final NPDES Permit Renewal [PDF]	09/13/2018 - 10/01/2018	No	Counties: Hendricks, Huntington and Lake Project Manager: Taylor Wissel Permit Number: IN0056979
aPorte Gas Transmission Line hase II	Final General NPDES Permit Termination under 327 IAC 15-7 [PDF]	09/11/2018 - 10/01/2018	No	Counties: Laporte and Porter Project Manager: Catherine Hess Applicant Company: Northern Indiana Public Service Company (NIPSCO) Permit Number: ING670100
Jasper				
psum LLC	Significant Modification to a Part 70 Operating Permit [PDF]	09/08/2018 - 10/08/2018	Yes	Permit Number: 073-40269-00031
s of Indiana Wastewater Treatment Plant	Draft NPDES Permit Renewal [PDF]	08/15/2018 - 09/14/2018	Yes	Project Manager: John Donnellan Applicant Company: Community Utilities of Indiana, Inc. Permit Number: IN0039101

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- *Attainment*
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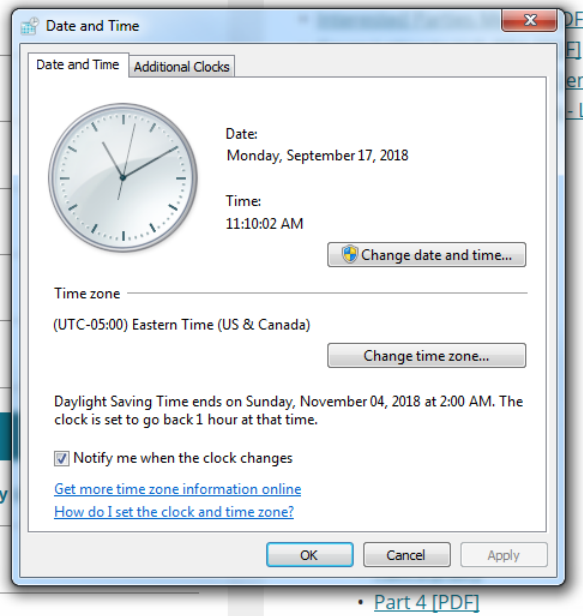

Dearborn County

1997 8-hour Ozone Standard

[DF]

[F]

emonstration and Technical Support Document For the Indiana Portion of the Cincinnati-Hamilton, OH-KY-IN "Basic"

- Lawrenceburg Township, Dearborn County, IN [DOC]

- Part 4 [PDF]
- Appendix K [PDF]
- Appendix L [PDF]
- Technical Addendum [PDF]

Lake and Porter Counties

2008 8-hour Ozone Standard

- Draft Indiana's Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision and Negative Declaration for the Oil and Natural Gas Industry Control Techniques Guidelines (CTGs) [PDF]
- Clarification Letter Regarding the 2011 Base Year Emissions Inventory for Indiana's Portion (Lake and Porter Counties) of the Chicago-Naperville, IL-IN-WI, 2008 8-Hour Ozone Nonattainment Area (November 21, 2017) [PDF]
- Section 172 and 182 Requirements for Indiana's Portion (Lake and Porter Counties) of the Chicago-Naperville, IL-IN-WI, 2008 8-Hour Ozone Nonattainment Area (February 28, 2017) [PDF]
  - Attachment A: Attainment Demonstration and Technical Support Document [PDF]
  - Attachment B: VOC Reasonably Available Control Technology (RACT) Certification [PDF]
  - Attachment C: 2017 15% Rate of Progress Plan and 3% Contingency Plan [PDF]
  - Attachment D: Revised 2011 Base-Year Inventory [PDF]
  - Attachment E: Nonattainment New Source Review Plan Certification [PDF]

11:10 AM
9/17/2018

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Smith, Amy (IDEM OAQ)

From: Samuel Henderson <SHenderson@hecweb.org>
Sent: Tuesday, September 18, 2018 1:45 PM
To: Smith, Amy (IDEM OAQ)
Subject: question regarding draft negative declaration

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Dear Ms. Smith:

I have a question about the draft *Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision and Negative Declaration for the Oil and Natural Gas Industry Control Techniques Guidelines (CTGs)*, recently posted on the IDEM website.

I notice that the petroleum bulk storage tank facilities in northern Lake County (Citgo, Enbridge, etc.) don't seem to be included in the analysis. Can you shed any light on why these facilities were left out?

Thanks,

Sam

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Summary/Response to Comments Received During the Public Comment Period for *Indiana's Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision and Negative Declaration for the Oil and Natural Gas Industry Control Techniques Guidelines (CTGs)*

From September 21 to October 22, 2018, the Indiana Department of Environmental Management (IDEM) requested written public comment and provided opportunity to request a public hearing on *Indiana's Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision and Negative Declaration for the Oil and Natural Gas Industry Control Techniques Guidelines (CTGs)*. A public hearing was not requested and, therefore, not held. IDEM received written comment from the following party:

- Samuel Henderson, Hoosier Environmental Council *(HEC)*

Following is a summary of the written comment received and IDEM's response. **I**t should be noted that although edits were made to ensure consistency in the final documents, no critical information pertaining to substantive content was altered.

Comment 1:

Commenter inquired about the absence of petroleum bulk storage tank facilities in northern Lake County in the applicability analysis. Commenter provided Enbridge and CITGO as examples. *(HEC)*

Response 1:

In response to the inquiry, IDEM identified and evaluated bulk petroleum storage facilities in the affected area. Search tools included the U.S. Occupational Safety and Health Administration's Standard Industrial Classification (SIC) Search tool and the National Emissions Inventory. Further evaluation was conducted for facilities with SIC codes 1311-Crude Petroleum and Natural Gas, 4226-Special Warehousing and Storage, 4612-Crude Petroleum Pipelines, 4613-Refined Petroleum Pipelines, and 5171-Petroleum Bulk Stations and Terminals. No bulk petroleum storage facilities with these SIC codes were identified in Porter County. Several facilities in Lake County were identified, including the facilities named in the comment.

In reviewing the applicability of the CTGs, only bulk petroleum storage facilities associated with the extraction and production of crude oil are subject to the requirements. None of the bulk petroleum storage facilities in Northwest Indiana are located at extraction sites or associated with crude oil production. For that reason, the CTGs do not apply.

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