Enbridge
915 N. Eldridge Parkway, Suite 1100
Houston, TX 77079

117-48017-00010
MAI 12677

Preliminary Application Received by

State of Indiana IDEM-OAQ via Email 6-27-tc-5

June 27, 2024

IDEM Air Permits Administration
ATTN: Incoming Application
100 North Senate Avenue
MC 61-53, IGCN 1003
Indianapolis, IN 46204-2251

RE: Significant Permit Modification Application
Texas Eastern Transmission, LP
French Lick Compressor Station
French Lick, IN
Source ID: 117-00010

To Whom it May Concern:

Enclosed is an application for the significant permit modification of the Part 70 Operating Permit for the Texas Eastern Transmission, LP, French Lick Compressor Station, located at 11409 West State Road 56, French Lick, Indiana.

The attached application includes a complete description of the facility, potential emissions calculations, regulatory applicability analyses, and all required application forms.

If you have any questions regarding information in this application, please do not hesitate to contact me via email at chuck.zukor@enbridge.com or telephone at (713) 627-5791.

Sincerely,

Sr. Engineer
S&R/Air Projects

TITLE V SIGNIFICANT PERMIT MODIFICATION APPLICATION

Texas Eastern Transmission, LP
French Lick Compressor Station

Prepared By:

TRINITY CONSULTANTS
8900 Keystone Crossing
Suite 1070
Indianapolis, IN 46240
(317) 451-8100

January 2024

Project 234401.0032

Trinity Consultants

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1. INTRODUCTION

Texas Eastern Transmission, LP (Texas Eastern) owns and operates a natural gas compressor station in French Lick, Indiana (French Lick Compressor Station). Texas Eastern currently operates the French Lick Compressor Station under a Part 70 (Title V) Operating Permit Renewal No. T117-44604-00010 issued by the Indiana Department of Environmental Management (IDEM) on June 14, 2022.

Texas Eastern is proposing the addition of one (1) natural gas-fired emergency generator and categorically exempt space heaters to the French Lick Compressor Station.

State forms are included in Appendix A, and detailed emission calculations are included in Appendix B.

2. FACILITY DESCRIPTION AND PROPOSED CHANGES

2.1 Source Description

The French Lick Compressor Station is located at 11409 West State Road 56 in French Lick, Indiana, in French Lick Township of Orange County. Orange County is classified as an area of attainment for all criteria pollutants[1]. Texas Eastern transports natural gas via underground pipelines from the Gulf Coast region of the United States to the Northeast and Mid-Atlantic states. At several points along the pipeline, the gas must be recompressed to ensure that it continues to move along the pipeline and can be delivered to customers at serviceable pressures. The French Lick Compressor Station has been in operation since 1947.

The source is not classified as one of the 28 designated industrial source categories and consists of seven (7), natural gas fired compressor engines, as well as support equipment and various material storage and handling operations. The French Lick Compressor Station is an existing major source for NO_X under the Prevention of Significant Deterioration (PSD) rules and a major source under Section 112 of the Clean Air Act.

2.2 Permit Changes

Texas Eastern requests IDEM add the following emergency generator, which meets the definition of insignificant activity per 326 IAC 2-7-1(21)(J)(xxii)(BB), to Sections A.3 and E.1 of the French Lick Compressor Station's operating permit, with added language in bold:

One (1) natural gas-fired emergency generator identified as unit ENGEN-1, with a maximum power rating of 20 kW.

Texas Eastern requests IDEM add the following fuel oil-fired space heaters, which meet the definition of an insignificant activity per 326 IAC 2-7-1(21)(J)(i)(AA)(cc) to Section A.4 of the French Lick Compressor Station's operating permit, with added language in bold:

(i) Space heaters combusting fuel oil with a heat input capacity of less than or equal to two million (2,000,000) British thermal units per hour, and firing fuel containing less than or equal to five-tenths percent (0.5%) sulfur by weight.

[1] 326 IAC 1-4-60

3. EMISSIONS SUMMARY

3.1 Potential Emissions

The proposed project at the French Lick Compressor Station will emit particulate matter (PM), particulate matter with an aerodynamic diameter of less than 10 microns (PM_{10}), particulate matter with an aerodynamic diameter of less than 2.5 microns ($PM_{2.5}$), oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur dioxide (SO_2), volatile organic components (VOC), and hazardous air pollutants (HAPs). Table 3-1 below outlines the total emissions from the proposed generator.

Table 3-1. Unlimited PTE from Proposed Project

Modification Uncontrolled Potential to Emit (tons/yr)									
Emission Unit	PM	PM_{10}	$PM_{2.5}$	SO_2	NOx	VOC	CO	Total HAP	Worst Single HAP[1]
ENGEN-1	3.00E-04	3.00E-04	3.00E-04	2.00E-04	3.97E-02	3.60E-03	1.54	3.60E-03	2.27E-03
Space Heaters	1.93E-02	8.19E-02	8.19E-02	3.42E-01	8.67E-01	3.44E-02	2.41E-01	2.75E-02	1.67E-02
Total:	**0.02**	**0.08**	**0.08**	**0.34**	**0.91**	**0.04**	**1.78**	**0.03**	**0.02**
Exemption Thresholds[2]	**5**	**5**	**5**	**10**	**10**	**10**	**25**	**2.5**	**1**
Exempt?	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**

1. Worst single HAP is Chloride
2. Per 326 IAC 2-1.1-3 (e)

4. REGULATORY APPLICABILITY

The French Lick Compressor Station's operations are subject to state and federal air quality regulations. This section of the application highlights the applicability of state and federal requirements for the proposed project.

4.1 Source Classification

4.1.1 Prevention of Significant Deterioration Program

New Source Review (NSR) requires that federal construction permitting of new emission sources or modifications to existing emission sources be completed when a project results in a significant net emission increases. Two distinct NSR permitting programs apply depending on whether the facility is located in an attainment or nonattainment area for a particular pollutant. The PSD permitting program applies to project increases of those pollutants for which the area the facility is located in is classified as "attainment" or "unclassifiable". The French Lick Compressor Station is located in Orange County, Indiana, which has been classified as in attainment with the National Ambient Air Quality Standard (NAAQS) or unclassifiable for all regulated pollutants. The French Lick Compressor Station is potentially subject to PSD permitting requirements.

GHG have been regulated under the PSD permitting program beginning with the issuance of U.S. EPA's Tailoring Rule; however, the SCOTUS issued a ruling limiting U.S. EPA's authority to regulate GHG under this program. Therefore, GHG shall not be considered for purposes of determining a major source under the PSD program.

Currently, the facility-wide NO_X PTE is greater than the PSD major source threshold of 250 tpy; therefore, the facility is a major stationary source under the PSD program. However, the permitting requirements under PSD have not been triggered because the proposed project does not meet the definition of a "major modification" to an existing source.

4.1.2 HAP Emissions

A major source of HAP is one with potential emissions in excess of 10 tpy for any individual HAP or 25 tpy for combined HAP. The French Lick Compressor Station is an existing major source of HAP and will remain a major source of HAP.

4.2 Federal Regulatory Applicability

4.2.1 New Source Performance Standards (NSPS)

New Source Performance Standards (NSPS) require new, modified, or reconstructed sources in applicable source categories to control emissions to the level achievable by the best demonstrated technology, as specified in the applicable provisions. Any source subject to an NSPS is also subject to the general provisions of NSPS Subpart A, except as noted.

4.2.1.1 Subpart JJJJ - Stationary Spark Ignition Internal Combustion

NSPS Subpart JJJJ regulates criteria pollutant emissions from emergency stationary SI ICE with a maximum engine power of greater than 19 kW and are manufactured on or after January 1, 2009.

The proposed natural gas-fired emergency generator is a stationary SI ICE, has a maximum engine power of greater than 19 kW and will be manufactured after January 1, 2009, therefore the provisions of NSPS Subpart JJJJ apply to the proposed emergency generator. A FED-01 form for this subpart has been included in Appendix A.

4.2.2 National Emissions Standards for Hazardous Air Pollutants (NESHAP)

NESHAPs apply to sources in specifically regulated industrial source classifications (Clean Air Act Section 112(d)) or on a case-by-case basis (Clean Air Act Section 112(g)) for facilities not regulated as a specific industrial source type. Pollutant specific NESHAP may also be applicable. NESHAP are primarily developed for particular industrial source categories. Therefore, the potential applicability of a particular NESHAP to a facility can be readily ascertained based on the industrial source category covered.

4.2.2.1 Subpart ZZZZ – Stationary Reciprocating Internal Combustion Engines

NESHAP Subpart ZZZZ for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) establishes emission and operating limitations for HAPs emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAPs. Pursuant to 40 CFR 63.6590(a), the affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding RICE tested at a test cell/stand. A stationary RICE at a major source of HAP emissions is classified as new if construction or reconstruction commenced on or after June 12, 2006.

The proposed natural gas-fired emergency generator is a stationary reciprocating internal combustion engine, will be located at a major source of HAPs, and will commence construction after June 12, 2006, therefore the provisions of NESHAP Subpart ZZZZ apply to the emergency generator. A FED-01 form for this subpart has been included in Appendix A.

4.3 State Regulatory Applicability

The following paragraphs address the applicability of specific state requirements in Title 326 of the IAC to the proposed project.

4.3.1 Source Modifications (326 IAC 2-7-10.5)

Pursuant to 326 IAC 2-7-10.5(a), a Title V source proposing to construct new emission units, modify existing units or otherwise modify the source as described in 326 IAC 2-7-10.5 shall submit a request for a modification approval in accordance with 326 IAC 2-7-10.5. As shown in Table 3-1 and in Appendix B, the uncontrolled PTE from the proposed units is less than the exemption thresholds in 326 IAC 2-1.1-3(e). Therefore, the proposed project is exempt from the provisions of 326 IAC 2-7-10.5.

4.3.2 Permit Modification (326 IAC 2-7-12)

A permit modification is required for any revision to a Title V permit that cannot be accomplished under the provisions for administrative permit amendments contained in 326 IAC 2-7-11. Pursuant to 326 IAC 2-7-12, a significant permit modification should be used if the modification involves a significant changes to existing monitoring, reporting, or record keeping requirements in the Part 70 permit. The emergency generator is subject to a NSPS requirement which is not already included in the current permit. Therefore, Texas Eastern requests the proposed changes be incorporated into the French Lick Compressor Station's Title V permit through a significant permit modification.

4.3.3 Particulate Emission Limitations for Sources of Indirect Heating (326 IAC 6-2)

The categorically exempt emergency generator and space heaters are exempt from the requirements of 326 IAC 6-2, because pursuant to 326 IAC 1-2-19, these emission units do not meet the definition of an indirect heating unit.

APPENDIX A. STATE FORMS

AIR PERMIT APPLICATION COVER SHEET

State Form 50639 (R4 / 1-10)
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IDEM – Office of Air Quality – Permits Branch
100 N. Senate Avenue, MC 61-53 Room 1003
Indianapolis, IN 46204-2251
Telephone: (317) 233-0178 or
Toll Free: 1-800-451-6027 x30178 (within Indiana)
Facsimile Number: (317) 232-6749
www.IN.gov/idem

NOTES:

- The purpose of this cover sheet is to obtain the core information needed to process the air permit application. This cover sheet is required for all air permit applications submitted to IDEM, OAQ. Place this cover sheet on top of all subsequent forms and attachments that encompass your air permit application packet.
- Submit the completed air permit application packet, including all forms and attachments, to **IDEM Air Permits Administration** using the address in the upper right hand corner of this page.
- IDEM will send a bill to collect the filing fee and any other applicable fees.
- Detailed instructions for this form are available on the Air Permit Application Forms website.

FOR OFFICE USE ONLY
PERMIT NUMBER:
117-48017-00010
DATE APPLICATION WAS RECEIVED:

1. Tax ID Number: [redacted]

PART A: Purpose of Application

Part A identifies the purpose of this air permit application. For the purposes of this form, the term "source" refers to the plant site as a whole and NOT to individual emissions units.

2. Source / Company Name: Texas Eastern Transmission, LP
3. Plant ID: 117 — 00010

4. Billing Address: 915 N. Eldridge Parkway, Suite 1100
City: Houston **State:** TX **ZIP Code:** 77079

5. Permit Level: ☐ Exemption ☐ Registration ☐ SSOA ☐ MSOP ☐ FESOP ☒ TVOP ☐ PBR

6. Application Summary: *Check all that apply. Multiple permit numbers may be assigned as needed based on the choices selected below.*

☐ Initial Permit ☐ Renewal of Operating Permit ☐ Asphalt General Permit
☐ Review Request ☐ Revocation of Operating Permit ☐ Alternate Emission Factor Request
☐ Interim Approval ☐ Relocation of Portable Source ☐ Acid Deposition (Phase II)
☐ Site Closure ☐ Emission Reduction Credit Registry

☐ Transition (between permit levels) *From:* *To:*

☐ Administrative Amendment: ☐ *Company Name Change* ☐ *Change of Responsible Official*
☐ *Correction to Non-Technical Information* ☐ *Notice Only Change*
☐ *Other (specify):*

☒ Modification: ☒ *New Emission Unit or Control Device* ☐ *Modified Emission Unit or Control Device*
☐ *New Applicable Permit Requirement* ☐ *Change to Applicability of a Permit Requirement*
☐ *Prevention of Significant Deterioration* ☐ *Emission Offset* ☐ *MACT Preconstruction Review*
☐ *Minor Source Modification* ☐ *Significant Source Modification*
☐ *Minor Permit Modification* ☒ *Significant Permit Modification*
☐ *Other (specify):*

7. Is this an application for an initial construction and/or operating permit for a **"Greenfield" Source**? ☐ Yes ☒ No

8. Is this an application for construction of a new emissions unit at an **Existing Source**? ☒ Yes ☐ No

Continued on Next Page

PART B: Pre-Application Meeting

Part B specifies whether a meeting was held or is being requested to discuss the permit application.

9. Was a meeting held between the company and IDEM prior to submitting this application to discuss the details of the project?

☒ No ☐ Yes: *Date:*

10. Would you like to schedule a meeting with IDEM management and your permit writer to discuss the details of this project?

☒ No ☐ Yes: *Proposed Date for Meeting:*

PART C: Confidential Business Information

Part C identifies permit applications that require special care to ensure that confidential business information is kept separate from the public file.

Claims of confidentiality must be made at the time the information is submitted to IDEM, and must follow the requirements set out in the Indiana Administrative Code (IAC). To ensure that your information remains confidential, refer to the IDEM, OAQ information regarding submittal of confidential business information. For more information on confidentiality for certain types of business information, please review IDEM's Nonrule Policy Document Air-031-NPD regarding Emission Data.

11. Is any of the information contained within this application being claimed as **Confidential Business Information**?

☒ No ☐ Yes

PART D: Certification Of Truth, Accuracy, and Completeness

Part D is the official certification that the information contained within the air permit application packet is truthful, accurate, and complete. Any air permit application packet that we receive without a signed certification will be deemed incomplete and may result in denial of the permit.

For a Part 70 Operating Permit (TVOP) or a Source Specific Operating Agreement (SSOA), a "responsible official" as defined in 326 IAC 2-7-1(34) must certify the air permit application. For all other applicants, this person is an "authorized Individual" as defined in 326 IAC 2-1.1-1(1).

☒ *I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete.*

Stephen McFadden	Director Field Operations Central Region
Name *(typed)*	Title
[signature]	1-23-24
Signature	Date

OAQ GENERAL SOURCE DATA APPLICATION
GSD-01: Basic Source Level Information

State Form 50640 (R5 / 1-10)
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IDEM – Office of Air Quality – Permits Branch
100 N. Senate Avenue, MC 61-53 Room 1003
Indianapolis, IN 46204-2251
Telephone: (317) 233-0178 or
Toll Free: 1-800-451-6027 x30178 (within Indiana)
Facsimile Number: (317) 232-6749
www.IN.gov/idem

NOTES:

- The purpose of GSD-01 is to provide essential information about the entire source of air pollutant emissions. GSD-01 is a required form.
- Detailed instructions for this form are available on the Air Permit Application Forms website.
- All information submitted to IDEM will be made available to the public unless it is submitted under a claim of confidentiality. Claims of confidentiality must be made at the time the information is submitted to IDEM, and must follow the requirements set out in 326 IAC 17.1-4-1. Failure to follow these requirements exactly will result in your information becoming a public record, available for public inspection.

PART A: Source / Company Location Information

1. **Source / Company Name**: Texas Eastern Transmission, LP French Lick Compressor Station
2. **Plant ID**: 117 – 00010
3. **Location Address**: 11409 West State Road 56
   - **City**: French Lick
   - **State**: IN
   - **ZIP Code**: 47432 – 9753
4. **County Name**: Orange
5. **Township Name**: French Lick
6. **Geographic Coordinates**:
   - **Latitude**: 38°31'15.744"N
   - **Longitude**: 86°40'17.364"W
7. **Universal Transferal Mercadum Coordinates** *(if known)*:
   - **Zone**: 16
   - **Horizontal**: 528637
   - **Vertical**: 4263679
8. **Adjacent States**: Is the source located within 50 miles of an adjacent state?
   ☐ No ☒ Yes – *Indicate Adjacent State(s):* ☒ Illinois (IL) ☐ Michigan (MI) ☐ Ohio (OH) ☒ Kentucky (KY)
9. **Attainment Area Designation**: Is the source located within a non-attainment area for any of the criteria air pollutants?
   ☒ No ☐ Yes – *Indicate Nonattainment Pollutant(s):* ☐ CO ☐ Pb ☐ NO_x ☐ O_3 ☐ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☐ SO_2
10. **Portable / Stationary**: Is this a portable or stationary source? ☐ Portable ☒ Stationary

PART B: Source Summary

11. **Company Internet Address** *(optional)*:
12. **Company Name History**: Has this source operated under any other name(s)?
    ☒ No ☐ Yes – *Provide information regarding past company names in Part I, Company Name History.*
13. **Portable Source Location History**: Will the location of the portable source be changing in the near future?
    ☒ Not Applicable ☐ No ☐ Yes – *Complete Part J, Portable Source Location History, and Part K, Request to Change Location of Portable Source.*
14. **Existing Approvals**: Have any exemptions, registrations, or permits been issued to this source?
    ☐ No ☒ Yes – *List these permits and their corresponding emissions units in Part M, Existing Approvals.*
15. **Unpermitted Emissions Units**: Does this source have any unpermitted emissions units?
    ☒ No ☐ Yes – *List all unpermitted emissions units in Part N, Unpermitted Emissions Units.*
16. **New Source Review**: Is this source proposing to construct or modify any emissions units?
    ☒ No ☐ Yes – *List all proposed new construction in Part O, New or Modified Emissions Units.*
17. **Risk Management Plan**: Has this source submitted a Risk Management Plan?
    ☒ Not Required ☐ No ☐ Yes → Date submitted: EPA Facility Identifier: – –

Continued on Next Page

PART C: Source Contact Information

IDEM will send the original, signed permit decision to the person identified in this section. This person MUST be an employee of the permitted source.

18. Name of Source Contact Person: Susann Brown

19. Title *(optional)*: Supervisor Air Monitoring and Reporting

20. Mailing Address: 915 N. Eldridge Parkway, Suite 1100

City: Houston	**State**: TX	**ZIP Code**: 77079 –

21. Electronic Mail Address *(optional)*: susann.brown@enbridge.com

22. Telephone Number: (908) 821 – 1825	**23. Facsimile Number** *(optional)*: ( ) –

PART D: Authorized Individual/Responsible Official Information

IDEM will send a copy of the permit decision to the person indicated in this section, if the Authorized Individual or Responsible Official is different from the Source Contact specified in Part C.

24. Name of Authorized Individual or Responsible Official: Stephen McFadden

25. Title: Director Field Operations Central Region

26. Mailing Address: 555 Marriott Drive, Suite 600

City: Nashville	**State**: TN	**ZIP Code**: 37214 –

27. Telephone Number: (615) 872 – 5101	**28. Facsimile Number** *(optional)*: ( ) –

29. Request to Change the Authorized Individual or Responsible Official: Is the source officially requesting to change the person designated as the Authorized Individual or Responsible Official in the official documents issued by IDEM, OAQ? *The permit may list the title of the Authorized Individual or Responsible Official in lieu of a specific name.*

☒ No ☐ Yes – ***Change Responsible Official to:***

PART E: Owner Information

30. Company Name of Owner: Texas Eastern Transmission, LP

31. Name of Owner Contact Person: Susann Brown

32. Mailing Address: 915 N. Eldridge Parkway, Suite 1100

City: Houston	**State**: TX	**ZIP Code**: 77079 –

33. Telephone Number: (908) 821 – 1825	**34. Facsimile Number** *(optional)*: ( ) –

34. Operator: Does the "Owner" company also operate the source to which this application applies?

☐ No – *Proceed to Part F below.*	☒ Yes – *Enter "SAME AS OWNER" on line 35 and proceed to Part G below.*

PART F: Operator Information

35. Company Name of Operator: SAME AS OWNER

36. Name of Operator Contact Person:

37. Mailing Address:

City:	**State**:	**ZIP Code**: –

38. Telephone Number: ( ) –	**39. Facsimile Number** *(optional)*: ( ) –

Continued on Next Page

PART G: Agent Information

40. Company Name of Agent: Trinity Consultants

41. Type of Agent: ☒ Environmental Consultant ☐ Attorney ☐ Other (specify):

42. Name of Agent Contact Person: Emily Stewart

43. Mailing Address: 8900 Keystone Crossing

City: Indianapolis	**State**: IN	**ZIP Code**: 46240 –

44. Electronic Mail Address *(optional)*: estewart@trinityconsultants.com

45. Telephone Number: (317) 451 – 8102	**46. Facsimile Number** *(optional)*: ( ) –

47. Request for Follow-up: Does the "Agent" wish to receive a copy of the preliminary findings during the public notice period (if applicable) and a copy of the final determination? ☐ No ☒ Yes

PART H: Local Library Information

48. Date application packet was filed with the local library: within 10 days of application submittal

49. Name of Library: Melton Public Library

50. Name of Librarian *(optional)*: Ms. Trista Rue (Director)

51. Mailing Address: 8496 West College Street

City: French Lick	**State**: IN	**ZIP Code**: 47432 – 1026

52. Internet Address *(optional)*:

53. Electronic Mail Address *(optional)*:

54. Telephone Number: (812) 936 – 2177	**55. Facsimile Number** *(optional)*: ( ) –

PART I: Company Name History *(if applicable)*

Complete this section only if the source has previously operated under a legal name that is different from the name listed above in Section A.

56. Legal Name of Company	**57. Dates of Use**
N/A	to
	to
	to
	to
	to
	to
	to
	to
	to
	to

58. Company Name Change Request: Is the source officially requesting to change the legal name that will be printed on all official documents issued by IDEM, OAQ?

☒ No ☐ Yes – ***Change Company Name to***:

Continued on Next Page

PART J: Portable Source Location History *(if applicable)*

Complete this section only if the source is portable and the location has changed since the previous permit was issued. The current location of the source should be listed in Section A.

59. Plant ID	60. Location of the Portable Source	61. Dates at this Location
–	N/A	to
–		to
–		to
–		to
–		to
–		to
–		to
–		to
–		to
–		to
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–		to
–		to
–		to
–		to
–		to

PART K: Request to Change Location of Portable Source *(if applicable)*

Complete this section to request a change of location for a portable source.

62. Current Location:

Address: N/A

City:	**State**:	**ZIP Code**: –

County Name:

63. New Location:

Address:

City:	**State**:	**ZIP Code**: –

County Name:

Continued on Next Page

PART L: Source Process Description

Complete this section to summarize the main processes at the source.

64. Process Description	65. Products	66. SIC Code	67. NAICS Code
Natural Gas Transmission	Natural Gas Transmission	4922	48621

PART M: Existing Approvals *(if applicable)*

Complete this section to summarize the approvals issued to the source since issuance of the main operating permit.

68. Permit ID	69. Emissions Unit IDs	70. Expiration Date
44604	Title V Renewal	6/14/2027

PART N: Unpermitted Emissions Units *(if applicable)*

Complete this section only if the source has emission units that are not listed in any permit issued by IDEM, OAQ.

71. Emissions Unit ID	72. Type of Emissions Unit	73. Actual Dates		
		Began Construction	Completed Construction	Began Operation
	N/A			

PART O: New or Modified Emissions Units *(if applicable)*

Complete this section only if the source is proposing to add new emission units or modify existing emission units.

74. Emissions Unit ID	75. NEW	76. MOD	77. Type of Emissions Unit	78. Estimated Dates		
				Begin Construction	Complete Construction	Begin Operation
			See Application Narrative			

OAQ PROCESS INFORMATION APPLICATION
PI-02C: Combustion – Turbines & Reciprocating Internal Combustion Engines

State Form 52537 (R2 / 1-10)
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IDEM – Office of Air Quality – Permits Branch
100 N. Senate Avenue, MC 61-53 Room 1003
Indianapolis, IN 46204-2251
Telephone: (317) 233-0178 or
Toll Free: 1-800-451-6027 x30178 (within Indiana)
Facsimile Number: (317) 232-6749
www.IN.gov/idem

NOTES:

- The purpose of this form is to specify details that pertain only to turbines and internal combustion engines.
- Complete one PI-02C form for each emissions unit. If there are multiple emission units that are identical in nature, capacity, and use, you may use one PI-02C form to summarize the units.
- Detailed instructions for this form are available on the Air Permit Application Forms website.
- All information submitted to IDEM will be made available to the public unless it is submitted under a claim of confidentiality. Claims of confidentiality must be made at the time the information is submitted to IDEM, and must follow the requirements set out in 326 IAC 17.1-4-1. Failure to follow these requirements exactly will result in your information becoming a public record, available for anyone to inspect and photocopy.

PART A: Process Unit Details

Part A specifies operating information that is unique to turbines and reciprocating internal combustion engines. Definitions and additional explanation of terminology are included in the instructions for this form.

1. Unit ID:	ENGEN-1	
2. Type of Combustion Unit		
☐ Turbine:	☐ Simple Cycle ☐ Regenerative Cycle ☐ Cogeneration ☐ Combined Cycle	
☒ Reciprocating Internal Combustion Engine:	☐ 2-stroke lean-burn ☐ 4-stroke lean-burn ☒ 4-stroke rich-burn	
3. Combustion Process:	☐ Diffusion Flame Combustion ☐ Lean-Premix Staged Combustion	
4. Ignition Type:	☒ Spark ☐ Compression	
5. Power Output:	36 horsepower (hp) megawatts (MW)	
6. Duty Cycle:	100 hours per year (hr/yr)	
7. Fuel Used:	☒ Natural Gas Only ☐ Other – *Attach completed PI-02F.*	
8. Does this combustion unit supply power to an emergency generator?	☒ Yes	☐ No

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Continued on Next Page

PART B: Emission Controls and Limitations

Part B identifies control technology, control techniques or other process limitations that impact air emissions.

9. Add-On Control Technology: *Identify all control technologies used for this process. Attach completed CE-01 (unless "none").*

- ☒ None
- ☐ Catalytic Oxidation – *Attach CE-06*
- ☐ NOx Reduction – *Attach CE-09*
- ☐ Other *(specify)*: – *Attach CE-10.*

10. Control Techniques: *Identify all control techniques used for this process.*

- ☒ None *(explain)*: USEPA Certified by Manufacturer
- ☐ Air-To-Fuel Ratio Adjustments
- ☐ Aromatic Content Increase
- ☐ Boiling Point adjusted to 10% and 90%
- ☐ Cetane Number
- ☐ Charge Cooling
- ☐ Combustion Chamber Modifications
- ☐ Derating
- ☐ Electronic Timing & Metering
- ☐ Exhaust Gas Recirculation
- ☐ Fuel Additives
- ☐ Fuel Injection Pressure
- ☐ Injection Rate Control
- ☐ Injection Timing Retard
- ☐ Injector Nozzle Geometry
- ☐ Lean Combustion
- ☐ Low Sulfur Content Fuel
- ☐ Oil Consumption Control
- ☐ Pre-ignition Chamber Combustion
- ☐ Rapid Spill Nozzles
- ☐ Turbocharging
- ☐ Two Stage Lean / Lean Combustion
- ☐ Two Stage Rich / Lean Combustion
- ☐ Water/Fuel Emulsions
- ☐ Water / Steam Injection
- ☐ Other *(specify)*: – *Attach completed GSD-09.*

11. Process Limitations / Additional Information: *Identify any acceptable process limitations. Attach additional information if necessary.*

Not Applicable

OAQ FEDERAL RULE INCORPORATION APPLICATION
FED-01: Summary of Federal Requirements – NSPS & NESHAP

State Form 53512 (R / 1-10)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IDEM – Office of Air Quality – Permits Branch
100 N. Senate Avenue, MC 61-53, Room 1003
Indianapolis, IN 46204-2251
Telephone: (317) 233-0178 or
Toll Free: 1-800-451-6027 x30178 (within Indiana)
Facsimile Number: (317) 232-6749
www.in.gov/idem

NOTES:

- The purpose of this form is to provide a standardized way for sources to identify the NSPS or NESHAP requirements that are applicable to the regulated source. Complete one (1) form for each federal rule that applies to the source. This is a required form.
- Detailed instructions for this form are available on the Air Permit Application Forms website.
- All information submitted to IDEM will be made available to the public unless it is submitted under a claim of confidentiality. Claims of confidentiality must be made at the time the information is submitted to IDEM, and must follow the requirements set out in 326 IAC 17.1-4-1. Failure to follow these requirements exactly will result in your information becoming a public record.

Part A: Identification of Applicable Standard

Part A identifies the applicable standard and affected source.

1. Type of Standard:	☒ Part 60 NSPS ☐ Part 61 NESHAP ☐ Part 63 NESHAP (MACT)
2. Subpart Letter:	JJJJ
3. Source Category Name:	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
4. Affected Source *(Include all applicable emission unit IDs)*:	ENGEN-01

Part B: Applicable Requirements

Part B specifies the specific requirements of the federal rule that are applicable to the process or emission unit.

5. Applicable Requirements: *Identify the section of the federal standard that is applicable at the lowest subsection level. For example, if all of 40 CFR 63.342(c) is applicable, "40 CFR 63.342(c)" is the appropriate citation. If only paragraph 2 of 40 CFR 63.342(c) is applicable, then the appropriate citation is 40 CFR 63.342(c)(2).*

- 60.4230(a)(4)(iv), (a)(6)
- 60.4233(d)
- 60.4234
- 60.4236(c)
- 60.4237(c)
- 60.4243(a), (b)(1), (d)(1), (d)(2)(i), (d)(3)
- 60.4245(a), (b)
- 60.4246
- 60.4248
- Table 1 (applicable portions only)
- Table 3 (applicable portions only)

Continued on Next Page

Part C: Performance Testing Requirements	
Part C identifies the performance testing requirements that are applicable to the process or emission unit.	
6. Performance Testing:	N/A
7. Date of Initial Performance Test:	N/A
8. Test Methods:	
9. Was the initial performance test approved by IDEM?	☐ Yes: *Date approved:* _____ ☐ No
10. Did the initial performance test show compliance with the rule?	☐ Yes ☐ No: *Date of next performance test:* _____

Part D: Important Dates		
Part D identifies specific dates associated with the federal standard that are applicable to the process or emission unit.		
11. Date Initial Notification was Submitted:	N/A	
12. Initial Compliance Date:	☒ Startup: _____ ☐ Other: _____	
13. Other Dates	Description: N/A	Date: _____
	Description: N/A	Date: _____
	Description: N/A	Date: _____

Part E: Other Information
Part E identifies any additional information pertaining to the applicable federal rule. Attach additional information using form GSD-09 as necessary.
N/A

OAQ FEDERAL RULE INCORPORATION APPLICATION
FED-01: Summary of Federal Requirements – NSPS & NESHAP

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NOTES:

- The purpose of this form is to provide a standardized way for sources to identify the NSPS or NESHAP requirements that are applicable to the regulated source. Complete one (1) form for each federal rule that applies to the source. This is a required form.
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Part A: Identification of Applicable Standard

Part A identifies the applicable standard and affected source.

1. Type of Standard:	☐ Part 60 NSPS ☐ Part 61 NESHAP ☒ Part 63 NESHAP (MACT)
2. Subpart Letter:	ZZZZ
3. Source Category Name:	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)
4. Affected Source *(Include all applicable emission unit IDs)*:	ENGEN-01

Part B: Applicable Requirements

Part B specifies the specific requirements of the federal rule that are applicable to the process or emission unit.

5. Applicable Requirements: *Identify the section of the federal standard that is applicable at the lowest subsection level. For example, if all of 40 CFR 63.342(c) is applicable, "40 CFR 63.342(c)" is the appropriate citation. If only paragraph 2 of 40 CFR 63.342(c) is applicable, then the appropriate citation is 40 CFR 63.342(c)(2).*

- 40 CFR 63.6580
- 40 CFR 63.6585 (a), (b)
- 40 CFR 63.6590 (a)(2)(ii), (c)(6)
- 40 CFR 63.6665
- 40 CFR 63.6670
- 40 CFR 63.6675

Continued on Next Page

Part C: Performance Testing Requirements	
Part C identifies the performance testing requirements that are applicable to the process or emission unit.	
6. Performance Testing:	N/A
7. Date of Initial Performance Test:	
8. Test Methods:	
9. Was the initial performance test approved by IDEM?	☐ Yes: *Date approved:* _____ ☐ No
10. Did the initial performance test show compliance with the rule?	☐ Yes ☐ No: *Date of next performance test:* _____

Part D: Important Dates		
Part D identifies specific dates associated with the federal standard that are applicable to the process or emission unit.		
11. Date Initial Notification was Submitted:	N/A	
12. Initial Compliance Date:	☐ Startup: _____ ☐ Other: _____	
13. Other Dates	Description: _____	Date: _____
	Description: _____	Date: _____
	Description: _____	Date: _____

Part E: Other Information
Part E identifies any additional information pertaining to the applicable federal rule. Attach additional information using form GSD-09 as necessary.

APPENDIX B. EMISSION CALCULATIONS

Appendix B: Emission Calculations
Modification Summary

Company Name: **Texas Eastern Transmission, L.P.**
Source Address: **11409 West State Road 56 French Lick, IN 47432**

Uncontrolled, Unlimited Potential to Emit (tons/yr)									
Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NOx**	**VOC**	**CO**	**Total HAP**	**Worst Single HAP[1]**
Emissions from Existing Units[2]	**16.47**	**16.47**	**16.47**	**4.8**	**1079.67**	**43.72**	**131.52**	**31.03**	**18.8**
Emissions from Proposed Units	0.02	0.08	0.08	0.34	0.91	0.04	1.78	0.03	2.27E-03
Total:	**16.49**	**16.55**	**16.55**	**5.14**	**1080.58**	**43.76**	**133.30**	**31.06**	**18.80**
Title V Major Source Thresholds	**NA**	**100**	**100**	**100**	**100**	**100**	**100**	**10**	**25**
PSD Major Source Thresholds	**250**	**250**	**250**	**250**	**250**	**250**	**250**	**NA**	**NA**

1. Worst single HAP is Formaldehyde
2. Per Page 5 of TSD for Part 70 Renewal T117-44604-00010

Appendix B: Emission Calculations
Modification Summary

Company Name: Texas Eastern Transmission, L.P.
Source Address: 11409 West State Road 56 French Lick, IN 47432

Modification Uncontrolled Potential to Emit (tons/yr)									
Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NOx**	**VOC**	**CO**	**Total HAP**	**Worst Single HAP[1]**
ENGEN-1	3.00E-04	3.00E-04	3.00E-04	2.00E-04	3.97E-02	3.60E-03	1.54	3.60E-03	2.27E-03
Space Heaters	1.93E-02	8.19E-02	8.19E-02	3.42E-01	8.67E-01	3.44E-02	2.41E-01	2.75E-02	1.67E-02
Total:	**0.02**	**0.08**	**0.08**	**0.34**	**0.91**	**0.04**	**1.78**	**0.03**	**0.02**
Exemption Thresholds[2]	**5**	**5**	**5**	**10**	**10**	**10**	**25**	**2.5**	**1**
Exempt?	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**

1. Worst single HAP is Chloride
2. Per 326 IAC 2-1.1-3 (e)

Appendix B: Emission Calculations
Diesel-fired space heaters

Company Name: **Texas Eastern Transmission, L.P.**
Source Address: **11409 West State Road 56 French Lick, IN 47432**

Fuel Consumption gal/hr	Number of Heaters
2.75	4

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC**	CO
Emission Factor (lb/10^3 gal)	0.40	1.70	1.70	7.10	18.00	0.71	5.00
Potential Emissions (tons/yr)	1.93E-02	8.19E-02	8.19E-02	3.42E-01	8.67E-01	3.44E-02	2.41E-01

*PM emission factor is filterable PM only. PM10/2.5 emission factor is filterable and condensable PM10/2.5 combined.
**VOC Emission factor is for non-methane total organic compounds

Methodology
All emission factors are based on normal firing.
Emission Factors are from AP 42, Chapter 1.3, Tables 1.3-1, 1.3-2, 1.3-3, 1.3-9, and 1.3-11 for residential furnaces and distillate fuel oil No.2
Potential Emission (tons/yr) = Fuel consumption (gal/hr) * 8760 (hr/yr) * Number of Heaters * Emission Factor (lbs/10^3 gal) / 1000 (gal/10^3 gal) * 2000 (lbs/ton)

Hazardous Aur Pollutants (HAPs)

	HAPs - Organics				
	Formaldehyde	Toluene	Naphthalene	1,1,1-Trichloroethane	Benzene
Emission Factor in lb/10^3 gal	3.30E-02	6.20E-03	1.13E-03	2.36E-04	2.14E-04
Potential Emissions in tons/yr	1.59E-03	2.99E-04	5.44E-05	1.14E-05	1.03E-05

	HAPs - Metals				
	Nickel	Vanadium	Zinc	Flouride	Chloride
Emission Factor in lb/10^3 gal	8.45E-02	3.18E-02	2.91E-02	3.73E-02	3.47E-01
Potential Emissions in tons/yr	4.07E-03	1.53E-03	1.40E-03	1.80E-03	1.67E-02

Potential Emission of Combined HAPs (tons/yr)	**2.75E-02**	
Potential Emission of Highest Single HAP (tons/yr)	**1.67E-02**	**Chloride**

Methodology
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 1.3

TABLE C-1A
4-Stroke Rich-Burn Reciprocating Engines
Hourly and Annual Emission Estimates
Uncontrolled

Type		4srb				
Service		Emergency				
JJJJ Relevant Date		Manufactured: On or After 01/01/2009				
ZZZZ Status		New RICE at Area HAP Source				
Make		Generac				
Model		G-Force 1000 (Guaradian G007077)				
Fuel		Natural Gas				
Fuel Higher Heating Value (HHV)		1,020 BTU/scf			1,020 BTU/scf	
Ambient Temperature		80 °F			80 °F	
Power Output		36 bhp (mech.)			36 bhp (mech.)	
		17 kW (elec.)			17 kW (elec.)	
Heat Rate at HHV		9,475 BTU/hp-hr			9,475 BTU/hp-hr	
Operating Hours		100 hrs/yr				
Fuel Consumption		334 scfh			334 scfh	
		0.033 MMscf/yr				
Heat Input at HHV		0.34 MMBTU/hr			0.34 MMBTU/hr	
		34 MMBTU/yr	Uncontrolled			Uncontrolled
Pollutant	Control Efficiency	Uncontrolled	Average Hourly	Maximum Annual	Uncontrolled	Maximum Hourly
NO_X		2,373.20 lb/MMscf	0.7937 lb/hr	0.0397 tpy	2,373.20 lb/MMscf	0.7937 lb/hr
CO		91,842.72 lb/MMscf	30.7143 lb/hr	1.5357 tpy	91,842.72 lb/MMscf	30.7143 lb/hr
SO_2		14.29 lb/MMscf	0.0048 lb/hr	0.0002 tpy	14.29 lb/MMscf	0.0048 lb/hr
$PM_{10/2.5}$		19.80 lb/MMscf	0.0066 lb/hr	0.0003 tpy	19.80 lb/MMscf	0.0066 lb/hr
CO_{2-e}		158,202 lb/MMscf	53 lb/hr	3 tpy	158,202 lb/MMscf	53 lb/hr
CO_2		120,017 lb/MMscf	40 lb/hr	2 tpy	120,017 lb/MMscf	40 lb/hr
N_2O		0.23 lb/MMscf	0.0001 lb/hr	0.0000 tpy	0.23 lb/MMscf	0.0001 lb/hr
TOC (Total)		2,373.20 lb/MMscf	0.7937 lb/hr	0.0397 tpy	2,373.20 lb/MMscf	0.7937 lb/hr
Methane		1,524.68 lb/MMscf	0.5099 lb/hr	0.0255 tpy	1,524.68 lb/MMscf	0.5099 lb/hr
Ethane		633.06 lb/MMscf	0.2117 lb/hr	0.0106 tpy	633.06 lb/MMscf	0.2117 lb/hr
VOC (Total)		215.46 lb/MMscf	0.0721 lb/hr	0.0036 tpy	215.46 lb/MMscf	0.0721 lb/hr
VOC (non-HAP)		0.56 lb/MMscf	0.0002 lb/hr	0.0000 tpy	0.56 lb/MMscf	0.0002 lb/hr
HAP (Total)		214.90 lb/MMscf	0.0719 lb/hr	0.0036 tpy	214.90 lb/MMscf	0.0719 lb/hr
Acetaldehyde		1.85E+01 lb/MMscf	6.19E-03 lb/hr	3.09E-04 tpy	1.85E+01 lb/MMscf	6.19E-03 lb/hr
Acrolein		1.74E+01 lb/MMscf	5.83E-03 lb/hr	2.92E-04 tpy	1.74E+01 lb/MMscf	5.83E-03 lb/hr
Benzene		1.05E+01 lb/MMscf	3.50E-03 lb/hr	1.75E-04 tpy	1.05E+01 lb/MMscf	3.50E-03 lb/hr
Biphenyl						
Butadiene (1,3-)		4.40E+00 lb/MMscf	1.47E-03 lb/hr	7.35E-05 tpy	4.40E+00 lb/MMscf	1.47E-03 lb/hr
Carbon Tetrachloride		1.17E-01 lb/MMscf	3.92E-05 lb/hr	1.96E-06 tpy	1.17E-01 lb/MMscf	3.92E-05 lb/hr
Chlorobenzene		8.55E-02 lb/MMscf	2.86E-05 lb/hr	1.43E-06 tpy	8.55E-02 lb/MMscf	2.86E-05 lb/hr
Chloroform		9.08E-02 lb/MMscf	3.04E-05 lb/hr	1.52E-06 tpy	9.08E-02 lb/MMscf	3.04E-05 lb/hr
Dichloropropene (1,3-)		8.42E-02 lb/MMscf	2.82E-05 lb/hr	1.41E-06 tpy	8.42E-02 lb/MMscf	2.82E-05 lb/hr
Ethylbenzene		1.64E-01 lb/MMscf	5.50E-05 lb/hr	2.75E-06 tpy	1.64E-01 lb/MMscf	5.50E-05 lb/hr
Ethylene Dibromide		1.41E-01 lb/MMscf	4.72E-05 lb/hr	2.36E-06 tpy	1.41E-01 lb/MMscf	4.72E-05 lb/hr
Formaldehyde		1.36E+02 lb/MMscf	4.54E-02 lb/hr	2.27E-03 tpy	1.36E+02 lb/MMscf	4.54E-02 lb/hr
Hexane (n-)						
Methanol		2.03E+01 lb/MMscf	6.78E-03 lb/hr	3.39E-04 tpy	2.03E+01 lb/MMscf	6.78E-03 lb/hr
Methylene Chloride		2.73E-01 lb/MMscf	9.13E-05 lb/hr	4.57E-06 tpy	2.73E-01 lb/MMscf	9.13E-05 lb/hr
Methylnaphthalene (2-)						
Naphthalene		6.44E-01 lb/MMscf	2.15E-04 lb/hr	1.08E-05 tpy	6.44E-01 lb/MMscf	2.15E-04 lb/hr
PAH		9.35E-01 lb/MMscf	3.13E-04 lb/hr	1.56E-05 tpy	9.35E-01 lb/MMscf	3.13E-04 lb/hr
Phenol						
Propylene Oxide						
Styrene		7.89E-02 lb/MMscf	2.64E-05 lb/hr	1.32E-06 tpy	7.89E-02 lb/MMscf	2.64E-05 lb/hr
Tetrachloroethane (1,1,2,2-)		1.68E-01 lb/MMscf	5.61E-05 lb/hr	2.80E-06 tpy	1.68E-01 lb/MMscf	5.61E-05 lb/hr
Toluene		3.70E+00 lb/MMscf	1.24E-03 lb/hr	6.19E-05 tpy	3.70E+00 lb/MMscf	1.24E-03 lb/hr
Trichloroethane (1,1,2-)		1.01E-01 lb/MMscf	3.39E-05 lb/hr	1.70E-06 tpy	1.01E-01 lb/MMscf	3.39E-05 lb/hr
Trimethylpentane (2,2,4-)						
Vinyl Chloride		4.76E-02 lb/MMscf	1.59E-05 lb/hr	7.96E-07 tpy	4.76E-02 lb/MMscf	1.59E-05 lb/hr
Xylenes		1.29E+00 lb/MMscf	4.32E-04 lb/hr	2.16E-05 tpy	1.29E+00 lb/MMscf	4.32E-04 lb/hr

NOTES

1. Fuel higher heating value selected to correspond to AP-42 emissions factors.
2. Maximum hourly emissions based on 100% of rated capacity.
3. Vendor provided data on power output and heat rate.
4. SO2 emission factor based on AP-42, Section 3.2 (Revised 7/00), Table 3.2-3 using Tariff (5.00 gr/100 scf).
5. PM10/2.5 emission factor based on AP-42, Section 3.2 (Revised 7/00), Table 3.2-3.
6. CO2 and N2O emission factors based on 40 CFR 98, Subpart C, Table C-1 and 40 CFR 98, Subpart C, Table C-2, respectively.
7. NOX, CO and TOC (Total) emission factors based on 40 CFR 60, Subpart JJJJ.
8. TOC specie emissions are estimated based on scaling of AP-42 using 40 CFR 60, Subpart JJJJ HC data.
   Emission factors based on: $EF_i = [EF_{(TOC)}]/[(EF_{TOC\text{-}AP42})]\ (EF_{i\text{-}AP42})$