PROPOSED CAAPP PERMIT
Trunkline Gas Company
I.D. No.: 041808AAF
Application No.: 95120002
November 8, 1999

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

Trunkline Gas Company
Attn: Charles Waite, Senior Air Engineer
P.O. Box 4967
Houston, Texas 77210-4967

Application No.: 95120002 I.D. No.: 041808AAF
Applicant's Designation: Date Received: December 1, 1995
Operation of: Natural Gas Compressor Station
Date Issued: TO BE DETERMINED Expiration Date[2]: DATE
Source Location: 927 North Co. Road 800E, Rural Tuscola
Responsible Official: J. L. Mohn, Vice President Trunkline Gas Company

This permit is hereby granted to the above-designated Permittee to OPERATE a Natural Gas Compressor Station, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Michael E. Davidson at 217-782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:MED:jar

cc: Illinois EPA, FOS, Region 3
USEPA

[1] This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 – federal PSD and 35 IAC Part 203 – Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

[2] Except as provided in Condition 8.7 of this permit.

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# 1.0 SOURCE IDENTIFICATION

## 1.1 Source

Trunkline Gas Company - Tuscola Compressor Station
927 North County Road 800E
Tuscola, Illinois 61953
Station Contact: Tony Lightle (217/253-3212)

I.D. No: 041808AAF
Standard Industrial Classification: 4922, Natural Gas Transmission

## 1.2 Owner/Parent Company

Trunkline Gas Company
P.O. Box 4967
Houston, Texas 77210-4967

## 1.3 Operator

Trunkline Gas Company
P.O. Box 4967
Houston, Texas 77210-4967

Charles Waite, Senior Air Engineer
713/989-7000

## 1.4 General Source Description

The Trunkline Gas Company - Tuscola Compressor Station is in a rural location near Tuscola, Illinois. The source utilizes large compressors driven by natural gas fired reciprocating engines to recompress and move natural gas through transmission pipelines. The primary sources of pollutants at this source are the natural gas fired reciprocating engines that power the compressors. These units emit combustion products during normal operation and after shutdown pressurized natural gas is vented to the atmosphere (i.e., blowdown emissions). Ancillary emission units at the source have been determined to be insignificant emission sources.

## 2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

| | |
|---|---|
| Act | Illinois Environmental Protection Act [415 ILCS 5/1 et seq.] |
| AIRS | Airs Facility Subsystem Source Classification Codes And Emission Factor Listing for Criteria Air Pollutants, U.S. Environmental Protection Agency, Research Triangle Park, NC. Office of Air Quality Planning and Standards, EPA/450/4-90/003 (March 1990) |
| AP-42 | Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711 |
| Btu | British thermal unit |
| CAA | Clean Air Act [42 U.S.C. Section 7401 et seq.] |
| CAAPP | Clean Air Act Permit Program |
| cf | cubic feet |
| CFR | Code of Federal Regulations |
| CO | Carbon Monoxide |
| °F | degrees Fahrenheit |
| gm/hp-hr | gram per horsepower hour |
| gr | grains |
| GRI | Topical Report: Measurement of Air Toxic Emissions from Natural Gas Fired Internal Combustion Engines at Natural Gas Transmission and Storage Facilities., Volume 1., Gas Research Institute (GRI-96/0009.1)., February, 1996. |
| HAP | Hazardous Air Pollutant |
| hp | horsepower |
| hr | hour |
| IAC | Illinois Administrative Code |
| I.D. No. | Identification Number of Source, assigned by Illinois EPA |
| Illinois EPA | Illinois Environmental Protection Agency |
| kg/hr | kilograms per hour |
| kW | kilowatts |
| lb | pound |
| lb/hp-hr | pound per horsepower hour |
| mmBtu | Million British thermal units |
| mcf | thousand cubic feet |
| mmcf | million cubic feet |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| $NO_x$ | Nitrogen Oxides |
| NSPS | New Source Performance Standards |
| PM | Particulate Matter |

| | |
|---|---|
| $PM_{10}$ | Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods |
| ppm | parts per million |
| PSD | Prevention of Significant Deterioration |
| psia | pounds per square inch absolute |
| RMP | Risk Management Plan |
| scf | Standard Cubic Feet |
| $SO_2$ | Sulfur Dioxide |
| T1 | Title I – identifies Title I conditions that have been carried over from an existing permit |
| T1N | Title I New – identifies Title I conditions that are being established in this permit |
| T1R | Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit |
| USEPA | United States Environmental Protection Agency |
| VOC | Volatile Organic Compounds |
| VOL | Volatile Organic Liquids |
| VOM | Volatile Organic Material |
| yr | year |

# 3.0 INSIGNIFICANT ACTIVITIES

## 3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

None

3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

## 3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability,

such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

## 4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

| Unit No. | Description | Emission Control Equipment |
|---|---|---|
| 6001 | Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 hp) | None |
| 6002 | Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 hp) | None |
| 6003 | Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 hp) | None |
| 6004 | Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 hp) | None |
| 6005 | Compressor Reciprocating Engine (Clark) Model TLA-8 (2,700 hp) | None |
| 6045 | Auxiliary Generator (Waukesha) Model 6NKR-F1905G (265 hp) | None |
| 6046 | Auxiliary Generator (Waukesha) Model 6NKR-F1905G (265 hp) | None |

## 5.0 OVERALL SOURCE CONDITIONS

### 5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of nitrogen oxides and carbon monoxide emissions.

5.1.2 This permit is issued based on the source being a major source of HAPs.

5.1.3 For purposes of the CAAPP and Title I of the Clean Air Act, Trunkline Gas Company is considered a single source with Panhandle Eastern Pipe Line Company, I.D. No. 041804AAC, located at 575 East Highway US 36, Tuscola, Illinois. The source has elected to obtain separate CAAPP permits for these locations.

### 5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC

212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

c. No person shall cause or allow the emissions of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm, pursuant to 35 IAC 214.301.

d. No person shall cause or allow the loading of any organic material with a vapor pressure of 2.5 psia or more at 70°F, e.g., gasoline, into any stationary tank having a storage capacity of greater than 946 1iters (250 gal), unless such tank is equipped with a permanent submerged loading pipe or submerged fill, or an equivalent device approved by the Illinois EPA, pursuant to 35 IAC 215.122(b) and (c).

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

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

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

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

5.2.4 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

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

b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.3 Non-Applicability of Regulations of Concern

This permit is issued based on the source not being subject to 40 CFR Part 63, Subpart HH, because the source does not contain an affected emission unit as specified in 40 CFR 63.760(b) [40 CFR 63.760(d)].

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

## 5.5 Source-Wide Emission Limitations

### 5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

| Pollutant | Tons/Year |
|---|---|
| Volatile Organic Material (VOM) | 45.18 |
| Sulfur Dioxide ($SO_2$) | 0.73 |
| Particulate Matter (PM) | 4.15 |
| Nitrogen Oxides ($NO_x$) | 2,679.85 |
| HAP, not included in VOM or Particulate Matter | None |
| TOTAL | 2,729.91 |

### 5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

### 5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

## 5.6 General Recordkeeping Requirements

### 5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

### 5.6.2 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

## 5.7 General Reporting Requirements

### 5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

### 5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

## 5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

## 5.9 General Compliance Procedures

### 5.9.1 General Procedures for Calculating VARIABLE Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 NOT APPLICABLE TO THIS PERMIT

# 7.0 UNIT SPECIFIC CONDITIONS

## 7.1 Group 1 Natural Gas Fired Internal Combustion Engines

### 7.1.1 Descriptions

The Permittee operates 2 cycle lean burn natural gas fired internal combustion engines which provide power to compressor units at the source that move natural gas through the source's associated transmission pipelines. In addition, the Permittee operates two (2) auxiliary generator sets that are each powered by a 2 cycle lean burn natural gas fired internal combustion engine. The principle source of emissions is from the combustion of natural gas within the engines.

"Blowdown Emissions" also occur when a particular compressor engine is removed from service. When a compressor engine is taken off-line, the valves on either side of the engine is closed. If the engine is down for a short time, approximately less than four hours, the engine is restarted without being blowdown. If the engine is removed from service for more than four hours or maintenance requires that the engine be blown down, the natural gas between the two valves including the natural gas in the engine and compressor are released to the atmosphere.

### 7.1.2 List of Emission Equipment and Pollution Control Equipment

| Unit No. | Description | Emission Control Equipment |
|---|---|---|
| 6001 | Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 hp) | None |
| 6002 | Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 hp) | None |
| 6003 | Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 hp) | None |
| 6004 | Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 hp) | None |
| 6005 | Compressor Reciprocating Engine (Clark) Model TLA-8 (2,700 hp) | None |
| 6045 | Auxiliary Generator (Waukesha) Model 6NKR-F1905G (265 hp) | None |
| 6046 | Auxiliary Generator (Waukesha) Model | None |

| | | |
|---|---|---|
| | 6NKR-F1905G (265 hp) | |

7.1.3 Applicability Provisions and Applicable Regulations

a. An “affected engine” for the purpose of these unit-specific conditions, are compressor engines used in transporting natural gas for the purpose of these unit specific conditions, identified in 7.1.2.

b. Each affected engine is subject to the emission limits identified in Condition 5.2.2.

c. The emissions of sulfur dioxide into the atmosphere from any affected engine shall not exceed 2000 ppm, [35 IAC 214.301].

d. The affected engines are subject to 35 IAC 215 Subpart K, which provides that the emissions of VOM into the atmosphere shall not exceed 3.6 kg/hr (8 lb/hr) from any engine, except as provided in 35 IAC 215.302, 215.303, or 215.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall only apply to photochemically reactive material [35 IAC 215.301].

7.1.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected units not being subject to the requirements of 35 IAC 212.321 or 212.322, because the liquid and gaseous fuels and combustion air used in the units are excluded from the definition of process weight rate, as defined in 35 IAC 211.5250.

b. This permit is issued based on affected engines not being subject to the requirements of 35 IAC 215.143 because the blowdown emissions are not capable of causing an excessive release, pursuant to the definition of “excessive release” - 35 IAC 211.2090.

c. The affected engines are not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission units, because the affected engines are not by definition a fuel combustion emission unit.

d. The affected engines are not subject to 35 IAC 217.121, emissions of nitrogen oxides from new fuel combustion emission sources, because the actual heat input of each unit is less than 73.2 MW (250 mmBtu/hr) and the affected gas turbine is not by definition a fuel combustion emission unit.

7.1.5 Operational and Production Limits and Work Practices

Natural Gas shall be the only fuel used to fire the affected engines at the source.

7.1.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.1.7 Testing Requirements

None

7.1.8 Inspection and Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected engine to demonstrate compliance with Conditions 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

a. Natural gas consumption for each affected engine, million per month and million per year;

b. Each engine’s hours of operation; and

c. Annual aggregate $NO_x$, VOM, $SO_2$, and PM emissions based on compliance procedures in Condition 7.1.12, with supporting calculations (ton/year);

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

a. Emissions of $NO_x$, PM, $SO_2$, or VOM from the affected engines in excess of the limits specified in Condition 5.5.1 within 30 days of such an occurrence.

7.1.11 Operational Flexibility/ Anticipated Operating Scenarios

None

7.1.12 Compliance Procedures

Compliance with the source-wide emission limits shall be based on the recordkeeping requirements of Conditions 7.1.9 and the use of the following emissions estimating methods.

a. Compliance with Condition 5.2.2(c) is assumed to be achieved by the work-practices inherent in operation of natural gas-fired reciprocating engines, so that no compliance procedures are set in this permit addressing this regulation.

b. For the purpose of calculating blowdown emissions from the affected engines, the following emission factor shall be used. The factor is based upon the maximum volume of natural gas vented per blowdown (10,000 scf/blowdown), the VOM content of the natural gas (1.082 lb VOM/mcf), and the maximum number of blowdowns per engine per year (75).

Blowdown Emissions = 10,000 scf/blowdown x 1.082 lb VOM/mcf x mcf/1000 scf x 75 blowdowns per engine per year

Blowdown Emissions Per Engine = 811.5 lb VOM/(Engine Year)

c. i. For the purpose of calculating operating emissions from the affected engines, the following emission factors shall be used.

Alternative factors are acceptable provided that sufficient documentation is included with the emissions calculations to demonstrate the appropriateness of the new factors. Revised emission factors found in AP-42 or other factors published by USEPA; factors developed by the source, e.g., factors developed through stack testing; factors developed by GRI; or factors developed by the engine manufacturer are acceptable.

A. Engines 6001 - 6004
2000 hp 2 Cycle lean burn

| Pollutant | Emission Factor gm/hp-hr | Factor Basis | Emission Rate lb/hr |
|---|---|---|---|
| $NO_x$ | 25 | 1 | 110.0 |
| $SO_2$ | -- | 2 | 0.03 |
| VOM | 0.72 | 1 | 2.85 |
| PM | 10 lb/mmcf | 3 | 0.17 |

B. Engine 60005
2700 hp 2 Cycle lean burn

| Pollutant | Emission Factor gm/hp-hr | Factor Basis | Emission Rate lb/hr |
|---|---|---|---|
| $NO_x$ | 25 | 1 | 148.50 |
| $SO_2$ | -- | 2 | 0.04 |
| VOM | 0.40 | 1 | 2.38 |
| PM | 10 lb/mmcf | 3 | 0.23 |

C. Engine 6045 - 6046
265 hp 4 Cycle rich burn

| Pollutant | Emission Factor gm/hp-hr | Factor Basis | Emission Rate lb/hr |
|---|---|---|---|
| $NO_x$ | 20 | 1 | 11.67 |
| $SO_2$ | -- | 2 | 0.004 |
| VOM | 0.20 | 1 | 0.12 |
| PM | 10 lb/mmcf | 3 | 0.23 |

1 Factor based upon manufacturer's specifications;

2 Emissions factor is based upon the sulfur content of natural gas (6

gr/1000 cf), calculated below, and the horsepower rating of the engine;

6 gr Sulfur/1000 scf x 2 $SO_2$/Sulfur x 1b/7000 gr x scf/1000 Btu x 8395 Btu/hp-hr = 0.0000144 lb $SO_2$/hp-hr

3 AIRS

ii. Engine Emission (lb or grams) = (Operating Hours of Engine, hr) x (The Appropriate Emission Rate Factor, lb/hr)

# 8.0 GENERAL PERMIT CONDITIONS

## 8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after _____{insert public notice start date} (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

## 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

## 8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

## 8.4 Operational Flexibility/Anticipated Operating Scenarios

### 8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as

not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

a. Describe the physical or operational change;

b. Identify the schedule for implementing the physical or operational change;

c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result

of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

| Monitoring Period | Report Due Date |
|---|---|
| January - June | September 1 |
| July - December | March 1 |

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company’s representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency (MC 40)
Bureau of Air
Compliance Section
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 (“Title I provisions”) and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

# 9.0 STANDARD PERMIT CONDITIONS

## 9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

## 9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or

denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

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

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

d. Sample or monitor any substances or parameters at any location:

   i. At reasonable times, for the purposes of assuring permit compliance; or

   ii. As otherwise authorized by the CAA, or the Act.

e. Obtain and remove samples of any discharge or emission of pollutants; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

## 9.5 Liability

### 9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

### 9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

### 9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

### 9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

### 9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

## 9.6 Recordkeeping

### 9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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 [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission

limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and

d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA 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 the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if

this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

# 10.0 ATTACHMENTS

## 10.1 Attachment 1 - Summary of Affected Engines

TABLE 1-1

Group 1

| Unit No. | Date Installed | Description | Serial No. | Location | Capacity |
|---|---|---|---|---|---|
| 6001 | 1964 | Compressor Reciprocating Engine (Clark) Model TLA-6 | 73699 | Engine Room | 2,000 hp |
| 6002 | 1964 | Compressor Reciprocating Engine (Clark) Model TLA-6 | 73700 | Engine Room | 2,000 hp |
| 6003 | 1964 | Compressor Reciprocating Engine (Clark) Model TLA-6 | 73701 | Engine Room | 2,000 hp |
| 6004 | 1964 | Compressor Reciprocating Engine (Clark) Model TLA-6 | 73713 | Engine Room | 2,000 hp |
| 6005 | 1968 | Compressor Reciprocating Engine (Clark) Model TLA-8 | 78566 | Engine Room | 2,700 hp |
| 6045 | 1964 | Auxiliary Generator (Waukesha) Model 6NKR-F1905G | 69740 | Utility Room | 265 hp |
| 6046 | 1964 | Auxiliary Generator (Waukesha) Model 6NKR-F1905G | 69741 | Utility Room | 265 hp |

10.2 Attachment 2 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

MED:jar

## I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

The Trunkline Gas Company - Tuscola Compressor Station is in a rural location near Tuscola, Illinois. The source utilizes large compressors driven by natural gas fired reciprocating engines to recompress and move natural gas through transmission pipelines. The primary sources of pollutants at this source are the natural gas fired reciprocating engines that power the compressors. These units emit combustion products during normal operation and after shutdown pressurized natural gas is vented to the atmosphere (i.e., blowdown emissions). Ancillary emission units at the source have been determined to be insignificant emission sources.

For purposes of the CAAPP and Title I of the Clean Air Act, Trunkline Gas Company is considered a single source with Panhandle Eastern Pipe Line Company, I.D. No. 041804AAC, located at 575 East Highway US 36, Tuscola, Illinois. The source has elected to obtain separate CAAPP permits for these locations.

## II. EMISSION UNITS

Significant emission units at this source are as follows:

| Unit No. | Description | Emission Control Equipment |
|---|---|---|
| 6001 | Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 hp) | None |
| 6002 | Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 hp) | None |
| 6003 | Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 hp) | None |
| 6004 | Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 hp) | None |
| 6005 | Compressor Reciprocating Engine (Clark) Model TLA-8 (2,700 hp) | None |
| 6045 | Auxiliary Generator (Waukesha) Model 6NKR-F1905G (265 hp) | None |
| 6046 | Auxiliary Generator (Waukesha) Model 6NKR-F1905G (265 hp) | None |

## III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

| Pollutant | Tons/Year |
|---|---|
| Volatile Organic Material (VOM) | 45.18 |
| Sulfur Dioxide ($SO_2$) | 0.73 |
| Particulate Matter (PM) | 4.15 |
| Nitrogen Oxides ($NO_x$) | 2,679.85 |
| HAP, not included in VOM or Particulate Matter | None |
| TOTAL | 2,729.91 |

## IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board’s emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

## V. PROPOSED PERMIT

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

## VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source’s permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 164.

MED:jar