FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES

Marathon Ashland Petroleum LLC.
1304 Olin Avenue
Indianapolis, Indiana 46224

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

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

Operation Permit No.: F097-15266-00078	
Issued by: Originally signed by John B. Chavez John B. Chavez, Administrator Office of Environmental Services	Issuance Date: May 1, 2003 Expiration Date: May 1, 2008

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Quarterly Deviation and Compliance Monitoring Report Form

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary source, petroleum product loading terminal.

Responsible Official:	District Manager or Manager, TT&M
Source Address:	1304 Olin Avenue, Indianapolis, Indiana 46222
Mailing Address:	HES-TT&M 539 S. Main Street, Findlay, Ohio 45840
General Source Phone:	317-244-9551
SIC Code:	5171
County Location:	Marion
County Status:	Nonattainment for total suspended particulate
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD

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

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

(a) One (1) petroleum products loading rack, identified as Loading Rack, with five (5) loading lanes, thirty-one (31) loading arms, and a maximum gasoline loading capacity of 525,000,000 gallons per year, with VOC emissions controlled by one (1) carbon adsorber vapor recovery system with two (2) fixed beds as the primary control device, or one (1) trailer mounted vapor combustor as the backup control device. The fugitive emissions, identified as F1, associated with this unit come from valves, loading arms, meters, pumps, etc. This facility was initially constructed in 1944 and modified in 1990 with the addition of a fifth loading lane.

(b) One (1) storage tank identified as Tank 55-5, constructed in 1944, with a maximum capacity of 2,161,068 gallons, storing gasoline, distillate, or ethanol, equipped with an internal floating aluminum roof and a mechanical shoe primary seal.

(c) One (1) storage tank identified as Tank 55-11, constructed in 1971, with a maximum capacity of 2,151,366 gallons, storing gasoline, distillate, or ethanol, equipped with an internal floating aluminum roof and a mechanical shoe primary seal.

(d) One (1) storage tank identified as Tank 80-13, constructed in 1974, with a maximum capacity of 3,313,422 gallons, storing gasoline, distillate, or ethanol, equipped with an internal floating steel roof and a mechanical shoe primary seal.

(e) One (1) storage tank identified as Tank 80-14, constructed in 1974, with a maximum capacity of 3,200,358 gallons, storing gasoline, distillate, or ethanol, equipped with an internal floating steel roof and a mechanical shoe primary seal.

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

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) British thermal units per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.

(c) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 British thermal units per hour.

(d) A petroleum fuel, other than gasoline, dispensing facility, having storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(e) The following VOC and HAP storage containers:
(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
(2)Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, [326 IAC 8-3-5][326 IAC 8-3-2]

(g) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3]

(h) Closed loop heating and cooling systems.

(i) Groundwater oil recovery wells.

(j) Activities associated with the treatment of wastewater streams with oil and grease content less than or equal to 1% by volume.

(k) Process vessels degassing and cleaning for internal repairs.

(l) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4-1]

(m) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities are not associated with the production process.

(n) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(o) Activities with VOC emissions less than 3 lbs per hour or 15 lbs per day. These include the following:

(1) Tanks 20-2, 20-4, 20-7,55-8 , 55-10, 80-12 and RB 8-1. All storing distillate(No.1 fuel

oil, No.2 fuel oil, or aviation jet fuel).

(2) Tank HA-2-1storing used oil.

(3) Tanks AA 8-1, AA 10-2, All holding gasoline additive.

(4) Tank AA 4-3,AA-4-6 All storing diesel additive.

(5) Jet Fuel Filter Draining Operation

(6) Tank AA 1-5, holding jet fuel de-icer.

(7) One (1) underground tank holding oil and water mix from an oil/water separator

(8) One (1) 280,000,000 BTU Furnace fueled by reclaimed used oil.

(9) Three (3) Tanks O-30-1, O-30-2, and O-30-3, holding ethanol.

(10) Tank AA 1-4 holding dye.

(p) One (1) storage tank identified as Tank T-15, constructed in 1980, with a maximum capacity of 113,820 gallons, storing transmix, and modified in 2000 with the installation of an internal floating steel roof and a mechanical shoe primary seal.The modifications will be in compliance with 326 IAC 8-4-3 and meet 40 CFR Subpart Kb standards. The emission calculations for this tank is 0.48 tons per year. This tank was constructed in 1980.

(q) Annual tank truck vapor tightness testing operations, identified as Garage.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2, has applied to the Indiana Department of Environmental Management (IDEM),
Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted by this permit.

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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

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

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

B.3 Permit Term [326 IAC 2-8-4(2)]

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

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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

B.6 Severability [326 IAC 2-8-4(4)]

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
City of Indianapolis

and

Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, OES within a reasonable time, any information that IDEM, OAQ, OES 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. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, OES copies of records required to be kept by this permit.

(c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

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

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

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

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

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

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, OES. IDEM, OAQ, and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

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

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

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

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

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

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

discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

OES
Telephone No.: 317/327-2234 (ask for the Air Permitting Section)
Facsimile No.: 317/327-2274

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

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

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

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

(e) IDEM, OAQ and OES, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ and OES, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a

violation of 326 IAC 2-8 and any other applicable rules.

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

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

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

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

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

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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

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

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

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

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

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and/or OES and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

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

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

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

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

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and/or OES takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and OES any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total

emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana
(AR-8J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

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

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

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ and/or OES, U.S. EPA, or an authorized representative to perform the following:

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

conditions of this permit;

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

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

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

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C **SOURCE OPERATION CONDITIONS**

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable.

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

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

(b) Any change or modification that increases the potential to emit PM to 250 tons per year or more shall cause this source to become a major source pursuant to 326 IAC 2-2, PSD, and shall require prior OAQ and OES approval.

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

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

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15)

minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(3) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(4) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, OES on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) petroleum products loading rack, identified as Loading Rack, with five (5) loading lanes, thirty-one (31) loading arms, and a maximum gasoline loading capacity of 525,000,000 gallons per year, with VOC emissions controlled by one (1) carbon adsorber vapor recovery system with two (2) fixed beds as the primary control device, or one (1) trailer mounted vapor combustor as the backup control device. The fugitive emissions, identified as F1, associated with this unit come from valves, loading arms, meters, pumps, etc. This facility was initially constructed in 1944 and modified in 1990 with the addition of a fifth loading lane.

(g) One (1) Garage used for tank truck vapor tightness testing operations

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

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

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart XX.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-8-4, 326 IAC 12 and 40 CFR Part 60.500, Subpart XX]

(a) The annual throughput of gasoline and/or neat ethanol delivered to the one (1) loading rack shall be limited to 315,000,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month. This is equivalent to VOC emissions of 46.10 tons per year. This emission limit, combined with the emission limit in Condition D.1.2 will make the requirements of 326 IAC 2-7 not applicable.

(b) Pursuant to 326 IAC 12 and 40 CFR Part 60.500, Subpart XX, the Loading Rack emissions, controlled with an existing vapor processing system, shall not exceed 35 milligrams of total organic compounds per liter of gasoline loaded.

(c) The limits under Condition D.1.1 (a) and (b) are necessary to limit the VOC PTE of the loading rack such that the sum of VOC emissions from the loading rack, the tanks, the garage, and the remaining fugitives are less than 100 tons per consecutive 12 month period, therefore the requirements of 326 IAC 2-7 do not apply.

D.1.3 Standard for Volatile Organic Compound (VOC) Emissions From Bulk Gasoline Terminals, Subpart XX [40 CFR 60.502] [326 IAC 12-1]

On and after the date on which 40 CFR 60.8(a) requires a performance test to be completed, the Permittee of each bulk gasoline terminal containing an affected facility shall comply with the following requirements:

(a) Each affected facility shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading.

(b) The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic com-pounds per liter of gasoline loaded.

(c) Each vapor collection system shall be designed to prevent any total organic compound vapors collected at one loading rack from passing to another loading rack.

(d) Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:

(1) The Permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck which is to be loaded at the affected facility.

(2) The Permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility.

(3) The Permittee shall cross-check each tank identification number obtained in para-graph (d)(2) with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained:

(A) If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the docu-mentation cross-check shall be performed each quarter; or

(B) If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the docu-mentation cross-check shall be performed semiannually.

If either the quarterly or semiannual cross-check provided in paragraphs (d)(3) (A) and (B) reveals that these conditions were not maintained, the source must return to biweekly monitoring until such time as these conditions are again met.

(4) The terminal Permittee shall notify the Permittee of each non-vapor-tight gasoline tank truck loaded at the affected facility within 1 week of the documentation cross-check in paragraph (d)(3) of this section.

(5) The terminal Permittee shall take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness docu-mentation for that tank is obtained.

(6) Alternate procedures to those described in paragraphs (d)(1) through (5) for limit-ing gasoline tank truck loadings may be used upon application to, and approval by, the Administrator.

(e) The Permittee shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.

(f) The Permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks.

(g) The vapor collection and liquid loading equipment shall be designed and operated to pre-vent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR 60.503(d).

(h) No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).

(i) Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks

for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-4-4]

Pursuant to 326 IAC 8-4-4 (Bulk gasoline terminals):

(a) No owner or operator of a bulk gasoline terminal shall permit the loading of gasoline into any transport, excluding railroad tank cars, or barges, unless:

(1) The bulk gasoline terminal is equipped with a vapor control system, in good working order, in operation and consisting of one of the following:

(A) An adsorber or condensation system which processes and recovers vapors and gases from the equipment being controlled, releasing no more than 35 milligrams per liter of VOC to the atmosphere.

(B) A vapor collection system which directs all vapors to a fuel gas system or incinerator.

(C) An approved control system, demonstrated to have control efficiency equivalent to or greater than clause (A) above.

(2) Displaced vapors and gases are vented only to the vapor control system.

(3) A means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

(4) All loading and vapor lines are equipped with fittings which make vapor-tight connections and which will be closed upon disconnection.

(b) If employees of the owner of the bulk gasoline terminal are not present during loading, it shall be the responsibility of the owner of the transport to make certain the vapor control system is attached to the transport. The owner of the terminal shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with this section.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-4-9]

Pursuant to 326 IAC 8-4-9 (Leaks from transports and vapor collection systems, records) the source will operate a vapor control system. The requirements are as follows:

(a) No person shall allow a gasoline transport that is subject to this rule and that has a capacity of two thousand (2,000) gallons or more to be filled or emptied unless the gasoline transport completes the following:

(1) Annual leak detection testing before the end of the twelfth calendar month following the previous year's test, according to test procedures contained in 40 CFR 63.425 (e), as follows:

(A) Conduct the pressure and vacuum tests for the transport's cargo tank using a time period of five (5) minutes. The initial pressure for the pressure test shall be four hundred sixty (460) millimeters H_2O (eighteen (18) inches H_2O) gauge. The initial vacuum for the vacuum test shall be one hundred fifty (150) millimeters H_2O (six (6) inches H_2O) gauge. The maximum allowable pressure or vacuum change is twenty-five (25) millimeters H_2O (one (1) inch H_2O) in five (5) minutes.

(B) Conduct the pressure test of the cargo tank's internal vapor valve as follows:
After completing the test under clause (A), use the procedures in 40 CFR 60, Appendix A, Method 27 to repressurize the tank to four hundred sixty

(460) millimeters H_2O (eighteen (18) inches H_2O) gauge. Close the transport's internal vapor valve or valves, thereby isolating the vapor return line and manifold from the tank.

(ii)Relieve the pressure in the vapor return line to atmospheric pressure, then reseal the line. After five (5) minutes, record the gauge pressure in the vapor return line and manifold. The maximum allowable five (5) minute pressure increase is one hundred thirty (130) millimeters H_2O (five (5) inches H_2O).

(2) Repairs by the gasoline transport owner or operator, if the transport does not meet the criteria of subdivision (1), and retesting to prove compliance with the criteria of subdivision (1).

(b) The annual test data remain valid until the end of the twelfth calendar month following the test. The owner of the gasoline transport shall be responsible for compliance with sub-section (b) and shall provide the owner of the loading facility with the most recent valid modified 40 CFR 60, Appendix A, Method 27 test results upon request. The owner of the loading facility shall take all reasonable steps, including reviewing the test date and tester's signature, to ensure that gasoline transports loading at its facility comply with subsection (a).

(c) The owner or operator of a vapor balance system or vapor control system subject to this rule shall:

(1) design and operate the applicable system and the gasoline loading equipment in a manner that prevents:

(A) gauge pressure from exceeding four thousand five hundred (4,500) pascals (eighteen (18) inches of H_2O) and a vacuum from exceeding one thousand five hundred (1,500) pascals (six (6) inches of H_2O) in the gasoline transport;

(B) except for sources subject to 40 CFR 60.503(b) (NESHAP/MACT) or 40 CFR 63. 425(a) (New Source Performance Standards) requirements, a reading equal to or greater than twenty-one thousand (21,000) parts per million as propane, from all points on the perimeter of a potential leak source when measured by the method referenced in 40 CFR 60, Appendix A, Method 21, or an equivalent procedure approved by the commissioner during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and

(C) avoidable visible liquid leaks during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and

(2) within fifteen (15) days, repair and retest a vapor balance, collection, or control system that exceeds the limits in subdivision (1).

(d) The department may, at any time, monitor a gasoline transport, vapor balance, or vapor control system to confirm continuing compliance with subsection (a) or (b).

(e) If the commissioner allows alternative test procedures in subsection (a)(1) or (c)(1)(B), such method shall be submitted to the U.S. EPA as a SIP revision.

(f) During compliance tests conducted under 326 IAC 3-6 (stack testing), each vapor balance or control system shall be tested applying the standards described in subsection (c)(1)(B). Testers shall use 40 CFR 60, Appendix A, Method 21 to determine if there are any leaks from the hatches and the flanges of the gasoline transports. If any leak is detected, the transport cannot be used for the capacity of the compliance test of the bulk

gas terminal. The threshold for leaks shall be as follows:

(1) Five hundred (500) parts per million methane for all bulk gas terminals subject to NESHAP/MACT (40 CFR 63, Subpart R).

(2) Ten thousand (10,000) parts per million methane for all bulk gas terminals subject to a New Source Performance Standard.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

D. 1.7 Leak Inspection

Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

Compliance Determination Requirements

D.1.8 VOC and HAPs

In order to comply with Conditions D.1.1, and D.1.3, the carbon adsorber vapor recovery unit, or one (1) of the three (3) backup trailer mounted thermal flare incinerators for VOC and HAPs control shall be in operation and control emissions from the loading rack at all times gasoline is being loaded.

D.1.9 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

(a) To demonstrate compliance with Condition D.1.3 a compliance stack test shall be performed within a six (6) month period which corresponds to five (5) years since the latest valid stack test plus one hundred and eighty (180) days at the carbon adsorber vapor recovery unit. This test shall be performed according to 40 CFR 60, Appendix A, Methods 25 and 25A.

(b) If the commissioner allows alternative test procedures in subsection (a)(1) or (c)(1)(B) of Condition D.1.3, such method shall be submitted to the U.S. EPA as a SIP revision.

(c) During compliance tests conducted under 326 IAC 3-6 (stack testing), each vapor balance or control system shall be tested applying the standards described in subsection (c)(1)(B) of Condition D.1.3. Testers shall use 40 CFR 60, Appendix A, Method 21 to determine if there are any leaks from the hatches and the flanges of the gasoline transports. If any leak is detected, the transport cannot be used for the capacity of the compliance test of the bulk gas terminal. The threshold for leaks shall be as follows:

(1) Five hundred (500) parts per million methane for all bulk gas terminals subject to NESHAP/MACT (40 CFR 63, Subpart R).

(2) Ten thousand (10,000) parts per million methane for all bulk gas terminals subject to a New Source Performance Standard.

D.1.10 Test Methods and Procedures, Subpart XX [40 CFR 60.503] [326 IAC 12-1]

(a) In conducting the performance tests required in 40 CFR 60.8, the Permittee shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in 40 CFR 60.8(b). The three-run requirement of 40 CFR 60.8(f) does not apply to this subpart.

(b) Immediately before the performance test required to determine compliance with 40 CFR 60.502 (b), (c), and (d), the Permittee shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline

tank truck is being loaded. The Permittee shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.

(c) The Permittee shall determine compliance with the standards in 40 CFR 60.502 (b) and (c) as follows:

(1) The performance test shall be 6 hours long during which at least 300,000 liters of gasoline is loaded. If this is not possible, the test may be continued the same day until 300,000 liters of gasoline is loaded or the test may be resumed the next day with another complete 6-hour period. In the latter case, the 300,000-liter criterion need not be met. However, as much as possible, testing should be conducted during the 6-hour period in which the highest throughput normally occurs.

(2) If the vapor processing system is intermittent in operation, the performance test shall begin at a reference vapor holder level and shall end at the same reference point. The test shall include at least two startups and shutdowns of the vapor processor. If this does not occur under automatically controlled operations, the system shall be manually controlled.

(3) The emission rate (E) of total organic compounds shall be computed using the following equation:

$$E = K\sum_{i=1}^{n} \frac{V_{esi} \cdot C_{ei}}{L \cdot 10^6}$$

where: E emission rate of total organic compounds, mg/liter of gasoline loaded.

V_{esi} =volume of air-vapor mixture exhausted at each interval “i”, scm.

C_{ei} =concentration of total organic compounds at each interval “i”, ppm.

L =total volume of gasoline loaded, liters.

n =number of testing intervals.

i =emission testing interval of 5 minutes.

K =density of calibration gas, 1.83×10^6 for propane and 2.41×10^6 for butane, mg/scm.

(4) The performance test shall be conducted in intervals of 5 minutes. For each interval ``i'', readings from each measurement shall be recorded, and the volume exhausted (V_{esi}) and the corresponding average total organic compounds concentration (C_{ei}) shall be determined. The sampling system response time shall be considered in determining the average total organic compounds concentration corresponding to the volume exhausted.

(5) The following methods shall be used to determine the volume (V_{esi}) air-vapor mixture exhausted at each interval:

(i) Method 2B shall be used for combustion vapor processing systems.

(ii) Method 2A shall be used for all other vapor processing systems.

(6) Method 25A or 25B shall be used for determining the total organic compounds concentration (C_{ei}) at each interval. The calibration gas shall be either propane

or butane. The Permittee may exclude the methane and ethane content in the exhaust vent by any method (e.g., Method 18) approved by the Administrator.

(7) To determine the volume (L) of gasoline dispensed during the performance test period at all loading racks whose vapor emissions are controlled by the processing system being tested, terminal records or readings from gasoline dispensing meters at each loading rack shall be used.

(d) The owner or operator shall determine compliance with the standard in Sec. 60.502(h) as follows:

(i) A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with [plusmn]2.5 mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck.

(ii) During the performance test, the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded. Every loading position must be tested at least once during the performance test.

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

D.1.11 Carbon Adsorber and Thermal Incinerator Operation

(a) For the one (1) carbon adsorber, to document compliance with Condition D.1.3, the Permittee shall perform monitoring of the key operating parameters, including bed pressure and vacuum level, once per shift each scheduled workday.

(b) For the three (3) trailer mounted thermal incinerators, to document compliance with Condition D.1.3, the Permittee shall perform monitoring once per shift each scheduled workday of the key operating parameters of the alarm system which detects pilot flame presence.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.12 Record Keeping Requirements

(a) To document compliance with Condition D.1.1 the Permittee shall:

(1) The tank truck vapor tightness documentation required under Sec. 60.502(e)(1)shall be kept on file at the terminal in a permanent form available for inspection.

(2) The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information:

(B) Test title: Gasoline Delivery Tank Pressure Test--EPA Reference Method 27.
(C) Tank owner and address.
(D) Tank identification number.
(E) Testing location.
(F) Date of test.
(G) Tester name and signature.
(H) Witnessing inspector, if any: Name, signature, and affiliation.
(I) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs).

(3) The terminal owner or operator shall keep documentation of all notifications required under Sec. 60.502(e)(4) on file at the terminal for at least 2 years.
(4) The owner or operator of an affected facility shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 3 years.

as well as maintain records at the source of the volume in gallons of each fuel received, including purchase orders and invoices necessary to verify the type and amount used;

(b) To document compliance with D.1.3, the owner or operator of a vapor balance or vapor control system subject to this section shall maintain records of all certification testing. The records shall identify the following:
(1) The vapor balance, vapor collection, or vapor control system.
(2) The date of the test and, if applicable, retest.
(3) The results of the test and, if applicable, retest.

The records shall be maintained in a legible, readily available condition for at least two (2) years after the date the testing and, if applicable, retesting were completed.

(c) To document compliance with Condition D.1.3, the owner or operator of a gasoline transport subject to this section shall keep a legible copy of the transport's most recent valid annual modified 40 CFR 60, Appendix A, Method 27 test either in the cab of the transport or affixed to the transport trailer. The test record shall identify the following:
(1) The gasoline transport.
(2) The type and date of the test and, if applicable, date of retest.
(3) The test methods, test data, and results certified as true, accurate, and in compliance with this rule by the person who performs the test.

This copy shall be made available immediately upon request to the department and to the owner of the loading facility for inspection and review. The department shall be allowed to make copies of the test results.

(d) To document compliance with Condition D.1.4, the Permittee shall maintain records of the following:
(1) Certification testing required under Condition D.1.4 , and
(2) Test required under Condition D.1.4 .

(e) To document compliance with Condition D.1.4 and Condition D.1.5, the Permittee shall maintain records at the facility of the materials used that contain any HAPs. The records shall be complete and sufficient to establish compliance with the HAP usage limits and/or HAP emission limits that may be established in this permit. The records shall contain a minimum of the following:
(1) The HAP/VOC ratio of each fuel received;
(2) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable; and
(3) Identification of the facility or facilities associated with the usage of each HAP

(f) To document compliance with Condition D.1.8 and D.1.7, the Permittee shall maintain records of the following operation parameters of the carbon adsorber vapor recovery unit:
(1) bed pressure; and
(2) vacuum level.

(g) To document compliance with Condition D.1.3 the Permittee shall maintain records of the following operation parameters of the backup portable thermal incinerator when in use:
(1) dates when the portable terminal incinerator is in use; and
(2) a log of the daily check of the alarm, on those dates.

(h) To document compliance with condition D.1.9 the Permittee shall maintain records of each monthly leak inspection required under Sec. 60.502(j) shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum, the following information: (1) Date of inspection. (2) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak). (3) Leak determination method. (4) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days). (5) Inspector name and signature.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the three (3) month period being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4 (10)]

Storage tanks for petroleum products consisting of the following:

(b) One (1) storage tank identified as Tank 55-5, constructed in 1944, with a maximum capacity of 2,161,068 gallons, storing gasoline, distillate, or ethanol, equipped with an internal floating aluminum roof and a mechanical shoe primary seal.

(c) One (1) storage tank identified as Tank 55-11, constructed in 1971, with a maximum capacity of 2,151,366 gallons, storing gasoline, distillate, or ethanol, equipped with an internal floating aluminum roof and a mechanical shoe primary seal.

(d) One (1) storage tank identified as Tank 80-13, constructed in 1974, with a maximum capacity of 3,313,422 gallons, storing gasoline, distillate, or ethanol, equipped with an internal floating steel roof and a mechanical shoe primary seal.

(e) One (1) storage tank identified as Tank 80-14, constructed in 1974, with a maximum capacity of 3,200,358 gallons, storing gasoline, distillate, or ethanol, equipped with an internal floating steel roof and a mechanical shoe primary seal.

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

D.2.1 Volatile Organic Compounds [326 IAC 8-4-3]

This rule applies to this source because it is located in Marion county therefore, pursuant to 326 IAC 8-4-3, storage tanks 55-5, 55-11, 80-13, and 80-14 shall meet the following requirements:

(a) The tanks shall be retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with an equally effective alternative control which has been approved.

(b) The tanks shall be maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.

(c) All openings, except stub drains, shall be equipped with covers, lids, or seals such that:

(1) the cover, lid, or seal is in the closed position at all times except when in actual use;

(2) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supporters; and

(3) rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

D. 2.2 General Provisions Realating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart K.

D.2.3 New Source Performance Standard (40 CFR Part 60.110, Subpart K)

Pursuant to 40 CFR Part 60.112, for gasoline tanks 80-13 and 80-14 the Permittee shall not store

any petroleum liquid with a true vapor pressure greater than 570 mmHg (11.1 psia) unless the storage vessel is equipped with a vapor recovery system or its equivalent. Compliance with condition D.2.1 (a) assures compliance with this.

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

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

D.2.5 Monitoring

The Permittee shall conduct a quarterly inspection of storage tanks 55-5, 55-11, 80-13, and 80-14 for visible holes, tears, or other openings in the seal or any seal fabric or materials. The inspections required in this condition can be conducted through roof hatches.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.4 Record Keeping Requirements

(a) To document compliance with Condition D.2.1(b), the Permittee shall maintain records of results of the quarterly inspections required in conditions D. 2.5.

(b) Pursuant to D.2.1 and D.2.2 the owner/operator of storage tanks 55-5, 55-10, 80-13, and 80-14 shall maintain the following records:

(1) petroleum liquid stored,

(2) the period of storage, and

(3) the maximum true vapor pressure of that liquid during the respective storage period.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(d) the owner or operator of each storage vessel shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

SECTION D.3 FACILITY OPERATION CONDITIONS

Insignificant emitting activities consisting of the following:

(a) Used oil combustion source with heat input equal to or less than ten million (10,000,000) Btu per hour [326 IAC 6-2-2].

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to [326 IAC 20-6, 326 IAC 8-3-2, 326 IAC 8-3-5].

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

(d) Activities with VOC emissions less than 3 lbs per hour or 15 lbs per day.

(e) One (1) storage tank identified as Tank T-15, constructed in 1980, with a maximum capacity of 113,820 gallons, storing transmix, and modified in 2000 with the installation of an internal floating steel roof and a mechanical shoe primary seal.The modifications will be in compliance with 326 IAC 8-4-3 and meet 40 CFR Subpart Kb standards. The emission calculations for this tank is 0.48 tons per year. This tank was constructed in 1980.

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

D.3.1 Particulate Matter (PM)[326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Particulate Matter Emission Limitations for Sources of Indirect Heating)**,** the PM emissions from the 0.6 and 0.8 mmBtu per hour boilers shall be limited to 0.6 pounds per mmBtu heat input.

D.3.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable-particulate emission rate from the Brazing equipment, cutting torches, soldering equipment and welding equipment shall each not exceed .551 pounds per hour when operating at a process weight rate of 100 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour;
and
P = process weight rate in tons per hour

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

(a) Equip the cleaner with a cover;
(b) Equip the cleaner with a facility for draining cleaned parts;
(c) Close the degreaser cover whenever parts are not being handled in the cleaner;
(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
(e) Provide a permanent, conspicuous label summarizing the operation requirements;
(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.4 Volatile Organic Compounds (VOC) 326 IAC 8-3-5(a)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility existing prior to January 1, 1980 shall ensure that the following control equipment requirements are met::

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120°F):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.3.5 New Source Performance Standard (40 CFR Part 60.116, Subpart Kb)

Storage tank T-15 is subject to the requirements of the New Source Performance Standard, 40 CFR Part 60, Subpart Kb, because the tank was modified in 2000, all other tanks are not subject to the requirements of 40 CFR Part 60, Subpart Kb, because they were constructed prior to the applicability date of July 23, 1984. The requirements for Tank T-15 are as follows:

Record Keeping and Reporting Requirement [40 CFR Part 60, Subpart Kb]

D.3.6 Record Keeping Requirements

Pursuant to 40 CFR Part 60, Subpart Kb the owner or operator of each storage vessel shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE of ENVIRONMENTAL SERVICES

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Marathon Ashland Petroleum LLC.
Source Address: 1304 Olin Avenue, Indianapolis, Indiana 46222
Mailing Address: HES-TT&M 539 S. Main Street, Findlay, Ohio 45840
FESOP No.: F0097-15266-00078

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

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

CITY OF INDIANAPOLIS
OFFICE of ENVIRONMENTAL SERVICES
DATA COMPLIANCE
2700 South Belmont Avenue
Indianapolis, Indiana 46221
Phone:317-327-2234
Fax:317-327-2274

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Marathon Ashland Petroleum LLC.
Source Address: 1304 Olin Avenue, Indianapolis, Indiana 46222
Mailing Address: HES-TT&M 539 S. Main Street, Findlay, Ohio 45840
FESOP No.: F0097-15266-00078

This form consists of 2 pages Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
OFFICE of ENVIRONMENTAL SERVICES

FESOP Quarterly Report

Source Name: Marathon Ashland Petroleum LLC.
Source Address: 1304 Olin Avenue, Indianapolis, Indiana 46222
Mailing Address: HES-TT&M 539 S. Main Street, Findlay, Ohio 45840
FESOP No.: F0097-15266-00078

Facility: **Loading Rack**
Parameter: **VOC**
Limit: **315,000,000 gallons of gasoline per twelve (12) consecutive month period**

MONTHS:_____ to_____YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
OFFICE of ENVIRONMENTAL SERVICES

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Marathon Ashland Petroleum LLC.
Source Address: 1304 Olin Avenue, Indianapolis, Indiana 46222
Mailing Address: HES-TT&M 539 S. Main Street, Findlay, Ohio 45840
FESOP No.: F0097-15266-00078

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

Marathon Ashland Petroleum LLC.
1304 Olin Avenue
Indianapolis, Indiana 46224

F097-15266-00078

On February 6, 2003, the Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) had a notice published in the Indianapolis Star, 1304 Olin Ave, Indianapolis, Indiana, stating that Marathon Ashland Petroleum had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal operate petroleum product loading terminal with control. The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The following changes, to the draft FESOP Renewal Permit, will be made. The TSD will remain as it originally appeared when published. These changes have no effect on the limited potential to emit (PTE) for this source. OES and OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the permit has been published are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

On February 20, 2003, Marathon Ashland Petroleum submitted comments on the proposed FESOP Renewal. (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes, if necessary.

Upon further review, the OES has decided to make the following revisions to the permit:

1. The permit number needs to be corrected throughout the permit from 00097-15266-00078 to 097-15266-00078 (remove extra zero).

2. In section A.3 (o)(9) the word and number four (4) should be corrected to the word and number three (3).

3. Item (f) of section A.2 should be deleted.

4. The Responsible Official: District Manager TT&M in section A.1 should be corrected to District Manager or Manager, TT&M.

5. In Condition D.1.1 (b) (now Condition D.1.2(b)) the number eighty (80) should be corrected to read number thirty-five **(35)**.

6. Condition D.1.7 (b) should be corrected to add the word monitoring. Condition D.1.7 (b)(now Condition D.1.11(b)) has been corrected the changes are as follows:

For the three (3) trailer mounted thermal incinerators, to document compliance with Condition D.1.3, the Permittee shall perform monitoring once per shift each scheduled workday of the key operating parameters of the alarm system which detects pilot flame presence.

7. Section D.1.8 Leak Inspection should be listed under the " Emission Limitation and Standards" section.

8. Record keeping pursuant to 40 CFR 60.505(a)(b)(d) and (f) should be added to section D.1.9 "Record Keeping Requirements"
Record Keeping Requirements

(1) The tank truck vapor tightness documentation required under Sec.60.502(e)(1) shall be kept on file at the terminal in a permanent form available for inspection.

(2) The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information:
(A) Test title: Gasoline Delivery Tank Pressure Test--EPA Reference Method 27.
(B) Tank owner and address.
(C) Tank identification number.
(D) Testing location.
(E) Date of test.
(F) Tester name and signature.
(G) Witnessing inspector, if any: Name, signature, and affiliation.
(H) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs).

(3) The terminal owner or operator shall keep documentation of all notifications required under Sec. 60.502(e)(4) on file at the terminal for at least 2 years.

(4) The owner or operator of an affected facility shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 3 years.

9. The Condition "Standard for Volatile Organic Compound (VOC) Emissions From Bulk Gasoline Terminals", Subpart XX [40 CFR 60.502] [326 IAC 12-1] should be added.
"Standard for Volatile Organic Compound (VOC) Emissions From Bulk Gasoline Terminals", Subpart XX [40 CFR 60.502] [326 IAC 12-1] has been added as follows:

On and after the date on which 40 CFR 60.8(a) requires a performance test to be completed, the Permittee of each bulk gasoline terminal containing an affected facility shall comply with the following requirements:

(a) Each affected facility shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading.

(b) The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic com-pounds per liter of gasoline loaded.

(c) Each vapor collection system shall be designed to prevent any total organic compound vapors collected at one loading rack from passing to another loading rack.

(d) Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:

(1) The Permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck which is to be loaded at the affected facility.

(2) The Permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility.

(3) The Permittee shall cross-check each tank identification number obtained in para-graph (d)(2) with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained:

(A) If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the docu-mentation cross-check shall be performed each quarter; or

(B) If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the docu-mentation cross-check shall be performed semiannually.

If either the quarterly or semiannual cross-check provided in paragraphs (d)(3) (A) and (B) reveals that these conditions were not maintained, the source must return to biweekly monitoring until such time as these conditions are again met.

(4) The terminal Permittee shall notify the Permittee of each non-vapor-tight gasoline tank truck loaded at the affected facility within 1 week of the documentation cross- check in paragraph (d)(3) of this section.

(5) The terminal Permittee shall take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness docu-mentation for that tank is obtained.

(6) Alternate procedures to those described in paragraphs (d)(1) through (5) for limit-ing gasoline tank truck loadings may be used upon application to and approval by, the Administrator.

(e) The Permittee shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.

(f) The Permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks.

(g) The vapor collection and liquid loading equipment shall be designed and operated to pre-vent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR 60.503(d).

(h) No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).

(i) Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

10. The Condition "Test Methods and Procedures" pursuant to Subpart XX [40 CFR 60.503] [326 IAC 12-1] should be added. "Test Methods and Procedures" pursuant to Subpart XX [40 CFR 60.503] [326 IAC 12-1] has been added as follows:

(a) In conducting the performance tests required in 40 CFR 60.8, the Permittee shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in 40 CFR 60.8(b). The three-run requirement of 40 CFR 60.8(f) does not apply to this subpart.

(b) Immediately before the performance test required to determine compliance with 40 CFR 60.502 (b), (c), and (d), the Permittee shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The Permittee shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.

(c) The Permittee shall determine compliance with the standards in 40 CFR 60.502 (b) and (c) as follows:

(1) The performance test shall be 6 hours long during which at least 300,000 liters of gasoline is loaded. If this is not possible, the test may be continued the same day until 300,000 liters of gasoline is loaded or the test may be resumed the next day with another complete 6-hour period. In the latter case, the 300,000-liter criterion need not be met. However, as much as possible, testing should be conducted during the 6-hour period in which the highest throughput normally occurs.

(2) If the vapor processing system is intermittent in operation, the performance test shall begin at a reference vapor holder level and shall end at the same reference point. The test shall include at least two

startups and shutdowns of the vapor processor. If this does not occur under automatically controlled operations, the system shall be manually controlled.

(3) The emission rate (E) of total organic compounds shall be computed using the following equation:

$$E = K \sum_{i=1}^{n} \frac{V_{esi} \cdot C_{ei}}{L \cdot 10^6}$$

where: E = emission rate of total organic compounds, mg/liter of gasoline loaded.

V_{esi} = volume of air-vapor mixture exhausted at each interval "i", scm.

C_{ei} = concentration of total organic compounds at each interval "i", ppm.

L = total volume of gasoline loaded, liters.

n = number of testing intervals.

i = emission testing interval of 5 minutes.

K = density of calibration gas, 1.83 x 10^6 for propane and 2.41 x 10^6 for butane, mg/scm.

(4) The performance test shall be conducted in intervals of 5 minutes. For each interval ``i'', readings from each measurement shall be recorded, and the volume exhausted (V_{esi}) and the corresponding average total organic compounds concentration (C_{ei}) shall be determined. The sampling system response time shall be considered in determining the average total organic compounds concentration corresponding to the volume exhausted.

(5) The following methods shall be used to determine the volume (V_{esi}) air-vapor mixture exhausted at each interval:

(i) Method 2B shall be used for combustion vapor processing systems.

(ii) Method 2A shall be used for all other vapor processing systems.

(6) Method 25A or 25B shall be used for determining the total organic compounds concentration (C_{ei}) at each interval. The calibration gas shall be either propane or butane. The Permittee may exclude the methane and ethane content in the exhaust vent by any method (e.g., Method 18) approved by the Administrator.

(7) To determine the volume (L) of gasoline dispensed during the performance test period at all loading racks whose vapor emissions are controlled by the processing system being tested, terminal records or readings from

gasoline dispensing meters at each loading rack shall be used.

(d) The owner or operator shall determine compliance with the standard in Sec. 60.502(h) as follows:

(i) A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with [plusmn]2.5 mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck.

(ii) During the performance test, the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded. Every loading position must be tested at least once during the performance test.

11. A condition D.1.1 concerning the General Provisions of the applicable NSPS has been added.

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart XX.

Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services

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

Source Background And Description

Source Name:	Marathon Ashland Petroleum LLC
Source Location:	1304 Olin Ave., Indianapolis, Indiana 46224
County:	Marion
SIC Code:	5171
Operation Permit No.:	F097-15266-00078
Permit Reviewer:	Warner Waters

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Marathon Ashland Petroleum LLC relating to the operation of a petroleum product loading terminal. Marathon Ashland Petroleum LLC was issued FESOP F097-5515-00078 on November 14, 1997.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following approvals (permits, registrations, exemptions, etc.) with the following emission units and pollution control devices:

Operating Permit, FESOP F097-5515-00078 on November 14, 1997 from City of Indianapolis Environmental Resource Management Division for the following units:

(a) One (1) petroleum products loading rack, identified as Loading Rack, with five (5) loading lanes, thirty-one (31) loading arms, and a maximum gasoline loading capacity of 525,000,000 gallons per year, with VOC emissions controlled by one (1) carbon adsorber vapor recovery system with two (2) fixed beds as the primary control device, or one (1) trailer mounted vapor combustor as the backup control device. The fugitive emissions, identified as F1, associated with this unit come from valves, loading arms, meters, pumps, etc. This facility was initially constructed in 1944 and modified in 1990 with the addition of a fifth loading lane.

(b) One (1) storage tank identified as Tank 55-5, constructed in 1944, with a maximum capacity of 2,161,068 gallons, storing gasoline, distillate, or ethanol, equipped with an internal floating aluminum roof and a mechanical shoe primary seal.

(c) One (1) storage tank identified as Tank 55-11, constructed in 1971, with a maximum capacity of 2,151,366 gallons, storing gasoline, distillate, or ethanol, equipped with an internal floating aluminum roof and a mechanical shoe primary seal.

(d) One (1) storage tank identified as Tank 80-13, constructed in 1974, with a maximum capacity of 3,313,422 gallons, storing gasoline, distillate, or ethanol, equipped with an internal floating steel roof and a mechanical shoe primary seal.

(e) One (1) storage tank identified as Tank 80-14, constructed in 1974, with a maximum capacity of 3,200,358 gallons, storing gasoline, distillate, or ethanol, equipped with an internal floating steel roof and a mechanical shoe primary seal.

(f) One (1) Garage used for tank truck vapor tightness testing operations

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) British thermal units per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.

(c) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 British thermal units per hour.

(d) A petroleum fuel, other than gasoline, dispensing facility, having storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(e) The following VOC and HAP storage containers:
(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
(2)Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, [326 IAC 8-3-5][326 IAC 8-3-2]

(g) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3]

(h) Closed loop heating and cooling systems.

(i) Groundwater oil recovery wells.

(j) Activities associated with the treatment of wastewater streams with oil and grease content less than or equal to 1% by volume.

(k) Process vessels degassing and cleaning for internal repairs.

(l) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4-1]

(m) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities are not associated with the production process.

(n) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(o) Activities with VOC emissions less than 3 lbs per hour or 15 lbs per day. These include the following:

(1) Tanks 20-2, 20-4, 20-7,55-8 , 55-10, 80-12 and RB 8-1. All storing distillate(No.1 fuel oil No.2 fuel oil, or aviation jet fuel).

(b) Tank HA-2-1storing used oil.

(3) Tanks AA 8-1, AA 10-2, All holding gasoline additive.

(4) Tank AA 4-3,AA-4-6 All storing diesel additive.

(5) Jet Fuel Filter Draining Operation

(6) Tank AA 1-5, holding jet fuel de-icer.

(7) One (1) underground tank holding oil and water mix from an oil/water separator

(8) One (1) 280,000,000 BTU Furnace fueled by reclaimed used oil.

(9) Four (4) Tanks O-30-1, O-30-2, and O-30-3, holding ethanol.

(10) Tank AA 1-4 holding dye.

(p) One (1) storage tank identified as Tank T-15, constructed in 1980, with a maximum capacity of 113,820 gallons, storing transmix, and modified in 2000 with the installation of an internal floating steel roof and a mechanical shoe primary seal.The modifications will be in compliance with 326 IAC 8-4-3 and meet 40 CFR Subpart Kb standards. The emission calculations for this tank is 0.48 tons per year. This tank was constructed in 1980.

(q) Annual tank truck vapor tightness testing operations, identified as Garage.

Existing Approvals

(a) FESOP 097- 5515-00078 , issued on November 11, 1997; and expires on November 11, 2002

(b) AAF 097 -10268-00078, issued on October 28, 1998

(c) AAF 097 -15997-00078, issued on May 13, 2002; and

(d) AAF 097 -15300-00078, issued April 23, 2002

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on January 24, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

The calculations submitted by the applicant for F097-15266-00078 have been verified and found to be accurate and correct. The source requested a increased limit to 315,000,000 gallons throughput on their loading rack from their original FESOP application. They have requested a change in this renewal, therefore, the limit will change. This renewal will incorporate this revision to their limit.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	0
PM-10	0
SO_2	0
VOC	less than 250
CO	0
NO_x	0

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

HAP	PTE (tons/year)
Hexane	less than 10
Benzene	less than 10
Toluene	less than 10
Xylenes	less than 10
Ethylbenzene	less than 10
2,2,4 Trimethylpentane	less than 10
TOTAL HAPs	less than 25

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions
Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on November 14, 1997, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original (FESOP. F097- 5515-00078; issued on November 14, 1997).

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Loading Rack	-	-	-	46.10	-	-	-
Tanks				30.66	-	-	-
Garage	-	-	-	2.68	-		-
Remaining Fugitives*	-	-	-	20.22	-	-	-
Total PTE After Issuance	-	-	-	99.660	-	-	-

*Composed of the remaining fugitives

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO_2	maintenance attainment
OZONE	maintenance attainment
CO	attainment
NO_2	attainment
Lead	unclassifiable

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

40 CFR 60, Subpart K
The storage tanks 80-13, and 80-14 are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60, Subpart K) because they have capacities greater than 246,052 liters (65,000 gallons) and commenced construction or modification after June 11, 1973, and prior to May 19, 1978. This NSPS does not apply to the remaining tanks at the source due to construction dates preceding the June 11, 1973 applicability date. The requirements of 40 CFR 60, Subpart K are as follows:

(a) The owner or operator of any storage vessel to which this subpart applies shall store petroleum liquids as follows: (1) If the true vapor pressure of the petroleum liquid, as stored, is equal to or greater than 78 mm Hg (1.5 psia) but not greater than 570 mm Hg (11.1 psia), the storage vessel shall be equipped with a floating roof, a vapor recovery system, or their equivalents.

(b) The owner or operator subject to this subpart shall maintain a record of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period.

40 CFR Part 60, Subpart Ka
Storage tanks AA 4-3, AA-4-6, AA 8-1, AA 10-2, O-30-1, O-30-2, O-30-3,20-2 , 20-4, 20-7 and RB 8-1 are not subject to the NSPS 40 CFR 60, Subpart Ka because the capacities are less than 40,000 gallons. Tanks 80-13, 80-14, 55-5, 55-11, 55-8 and 55-10 are not subject to the NSPS 40 CFR 60, Subpart Ka, although they have capacities greater than 40,000 gallons, because they were constructed prior to the applicability date of May 18, 1978.

40 CFR Part 60, Subpart Kb
Storage tank T-15 is subject to the requirements of the New Source Performance Standard, 40 CFR Part 60, Subpart Kb, because the tank was modified in 2000, all other tanks are not subject to the requirements of 40 CFR Part 60, Subpart Kb, because they were constructed prior to the applicability date of July 23, 1984. The requirements for Tank T-15 are as follows:

(a) The owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m\3\ containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa but less than 76.6 kPa or with a design capacity greater than or equal to 75 m\3\ but less than 151 m\3\ containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 27.6 kPa but less than 76.6 kPa, shall equip each storage vessel with one of the following:
  (a) A fixed roof in combination with an internal floating roof meeting the following specifications:
    (a) internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

    (b) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
      (a) foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid- filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

      (b) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

      (c) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.

(b) The owner or operator of each storage vessel shall keep readily accessible records

showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

The Loading Rack, although constructed prior to the New Source Performance Standard, 326 IAC 12, 40 CFR Part 60.500, Subpart XX applicability date of December 8, 1980, a fifth (5) loading station was added in 1990 and pursuant to 40 CFR 60.14, became subject to the New Source Performance Standard, 326 IAC 12, 40 CFR Part 60, Subpart XX with requirements as follows:

(a) For the loading rack facility equipped with an existing vapor processing system, the emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded.

(b) Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

(c) A record of each monthly leak inspection required under Sec. 60.502(j) shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum, the following information: (1) Date of inspection. (2) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak). (3) Leak determination method. (4) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days). (5) Inspector name and signature.

The gasoline distribution facility is not subject to the National Emission Standard for Hazardous Air Pollutants 326 IAC 20, (40 CFR Part 63, Subpart R) because it is not a major source of HAPs as defined by the rule.

There are no 40CFR Part 63 provisions that apply to this source. This source is not subject Subpart T because the degreaser does not use a halogenated solvent.

Neither the source or any emission unit at the source is subject to the requirements of 40 CFR Part 64 Compliance Assurance Monitoring because no Pollutant Specific Emissions Unit (PSEU) at the source has actual emissions after control in excess of a major source threshold and utilizes a control device to comply with an applicable requirement.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source had submitted an Emergency Reduction Plan (ERP) on January 4,1989. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

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

The Source was constructed in 1944 prior to August 7, 1977 therefore 326 IAC 2-2-2 does not apply. No modifications have been made that are subject to 326 IAC 2-2-2 (Prevention of Significant Deterioration).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOCs in Marion county. Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6 and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8).

326 IAC 2-4.1-1 (New Source Toxics Control)

There are no facilities located at this source that were constructed after July 27, 1997. The addition of a geodome in 2000 is not considered a reconstruction because the installation cost was less than 50% of the replacement cost of the tank. Therefore, 326 IAC 2-4.1-1 is not applicable.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of VOC shall be limited to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply. In order to comply with these limits, the annual throughput of gasoline and/or neat ethanol delivered to the one (1) loading rack shall be limited to 315,000,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

326 IAC 5-1 (Opacity Limitations)

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

(a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

State Rule Applicability - Individual Facilities

326 IAC 6-1 Applicability

The source does not have the potential to emit one hundred (100) tons or more of PM and has actual emissions of less than ten (10) tons of particulate matter per year. Therefore 326 IAC 6-1-1 does not apply to this source and no facility is listed under 326 IAC 6-1-12.

326 IAC 6-2-2 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-2 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 0.6 and 0.8 MMBTU per hour boilers shall be limited to 0.6 pounds per MMBTU heat input.

326 IAC 6-3 (Process Operations),

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable-particulate emission rate from the Brazing equipment, cutting torches, soldering equipment and welding equipment shall each not exceed .551 pounds per hour when operating at a process weight rate of 100 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour;
and
P = process weight rate in tons per hour

326 IAC 8-3-2 Volatile Organic Compounds (VOC)

The source is an existing facility as of January 1, 1980, which performs organic solvent degreasing operations located in Marion and has the potential emit ninety and seven-tenths (90.7) megagrams (one hundred (100) tons) or greater per year of VOC therefore pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

(a) Equip the cleaner with a cover;
(b) Equip the cleaner with a facility for draining cleaned parts;
(c) Close the degreaser cover whenever parts are not being handled in the cleaner;
(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
(e) Provide a permanent, conspicuous label summarizing the operation requirements;
(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 Cold cleaner degreaser operation and control

The source is an existing facility as of January 1, 1990, which performs organic solvent degreasing operations located in Marion and has the potential emit ninety and seven-tenths (90.7) megagrams (one hundred (100) tons) or greater per year of VOC.

326 IAC 8-4-3 Volatile Organic Compounds

This rule applies to this source because it is located in Marion county and has petroleum liquid storage vessels with capacities greater than one hundred fifty thousand (150,000) liters (thirty-nine thousand (39,000) gallons) containing volatile organic compounds whose true vapor pressure is greater than 10.5 kPa (1.52 psi). therefore, pursuant to 326 IAC 8-4-3, storage tanks 80-13, 80-14, 55-5, 55-11, 55-8 and 55-10 shall meet the following requirements:

(a) The tanks shall be retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with an equally effective alternative control which has been approved.

(b) The tanks shall be maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.

(c) All openings, except stub drains, shall be equipped with covers, lids, or seals such that:
  (1) the cover, lid, or seal is in the closed position at all times except when in actual use;

  (2) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supporters; and

  (3) rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

326 IAC 8-4-4 (Bulk Gasoline Terminals)

This source is subject to the requirements of 326 IAC 8-4-4 because the carbon adsorber was installed after January 1, 1980, and the source loads gasoline into trucks and therefore must control VOC emissions with an adsorber or thermal incinerator. This rule requires that:

(a) No owner or operator of a bulk gasoline terminal shall permit the loading of gasoline into any transport, excluding railroad tank cars, or barges, unless:

  (1) The bulk gasoline terminal is equipped with a vapor control system, in good working order, in operation and consisting of one of the following:

    (A) An adsorber or condensation system which processes and recovers vapors and gases from the equipment being controlled, releasing no more than 80 milligrams per liter of VOC to the atmosphere.

(B) A vapor collection system which directs all vapors to a fuel gas system or incinerator.

(C) An approved control system, demonstrated to have control efficiency equivalent to or greater than clause (A) above.

(2) Displaced vapors and gases are vented only to the vapor control system.

(3) A means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

(4) All loading and vapor lines are equipped with fittings which make vapor-tight connections and which will be closed upon disconnection.

(b) If employees of the owner of the bulk gasoline terminal are not present during loading, it shall be the responsibility of the owner of the transport to make certain the vapor control system is attached to the transport. The owner of the terminal shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with this section.

The gasoline loading rack with vapor control complies with this rule.

326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems; Records)

The source is subject to the requirements of 326 IAC 8-4-9 because the source operates a vapor control system therefore the source shall meet the following requirements. These requirements are as follows:

(a) No person shall allow a gasoline transport that is subject to this rule and that has a capacity of two thousand (2,000) gallons or more to be filled or emptied unless the gasoline transport completes the following:

(1) Annual leak detection testing before the end of the twelfth calendar month following the previous year's test, according to test procedures contained in 40 CFR 63.425 (e)*, as follows:

(A) Conduct the pressure and vacuum tests for the transport's cargo tank using a time period of five (5) minutes. The initial pressure for the pressure test shall be four hundred sixty (460) millimeters H_2O (eighteen (18) inches H_2O) gauge. The initial vacuum for the vacuum test shall be one hundred fifty (150) millimeters H_2O (six (6) inches H_2O) gauge. The maximum allowable pressure or vacuum change is twenty-five (25) millimeters H_2O (one (1) inch H2O) in five (5) minutes.

(B) Conduct the pressure test of the cargo tank's internal vapor valve as follows:

(i) After completing the test under clause (A), use the procedures in 40 CFR 60, Appendix A, Method 27* to repressurize the tank to four hundred sixty (460) millimeters H_2O (eighteen (18) inches H_2O) gauge. Close the transport's internal vapor valve or valves, thereby isolating the vapor return line and manifold from the tank.

(ii) Relieve the pressure in the vapor return line to atmospheric pressure, then reseal the line. After five (5) minutes, record the gauge pressure in the vapor return line and manifold. The maximum allowable five (5) minute pressure increase is one hundred thirty (130) millimeters H_2O (five (5) inches H_2O).

(2) Repairs by the gasoline transport owner or operator, if the transport does not meet the criteria of subdivision (1), and retesting to prove compliance with the criteria of subdivision (1).

(b) The annual test data remain valid until the end of the twelfth calendar month following the

test. The owner of the gasoline transport shall be responsible for compliance with subsection (b) and shall provide the owner of the loading facility with the most recent valid modified 40 CFR 60, Appendix A, Method 27* test results upon request. The owner of the loading facility shall take all reasonable steps, including reviewing the test date and tester's signature, to ensure that gasoline transports loading at its facility comply with subsection (a).

(c) The owner or operator of a vapor balance system or vapor control system subject to this rule shall:

(1) design and operate the applicable system and the gasoline loading equipment in a manner that prevents:

(A) gauge pressure from exceeding four thousand five hundred (4,500) pascals (eighteen (18) inches of H_2O) and a vacuum from exceeding one thousand five hundred (1,500) pascals (six (6) inches of H_2O) in the gasoline transport;

(B) except for sources subject to 40 CFR 60.503(b)* (NESHAP/MACT) or 40 CFR 63. 425(a)* (New Source Performance Standards) requirements, a reading equal to or greater than twenty-one thousand (21,000) parts per million as propane, from all points on the perimeter of a potential leak source when measured by the method referenced in 40 CFR 60, Appendix A, Method 21*, or an equivalent procedure approved by the commissioner during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and

(C) avoidable visible liquid leaks during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and

(D) A vapor collection system which directs all vapors to a fuel gas system or incinerator.

(2) within fifteen (15) days, repair and retest a vapor balance, collection, or control system that exceeds the limits in subdivision (1).

(d) The department may, at any time, monitor a gasoline transport, vapor balance, or vapor control system to confirm continuing compliance with subsection (a) or (b).

(e) The owner or operator of a vapor balance or vapor control system subject to this section shall maintain records of all certification testing. The records shall identify the following:

(1) The vapor balance, vapor collection, or vapor control system.

(2) The date of the test and, if applicable, retest.

(3) The results of the test and, if applicable, retest.

The records shall be maintained in a legible, readily available condition for at least two (2) years after the date the testing and, if applicable, retesting were completed.

(f) The owner or operator of a gasoline transport subject to this section shall keep a legible copy of the transport's most recent valid annual modified 40 CFR 60, Appendix A, Method 27 test either in the cab of the transport or affixed to the transport trailer. The test record shall identify the following:

(1) The gasoline transport.

(2) The type and date of the test and, if applicable, date of retest.

(3) The test methods, test data, and results certified as true, accurate, and in compliance with this rule by the person who performs the test.

This copy shall be made available immediately upon request to the department and to the owner of the loading facility for inspection and review. The department shall be allowed to make copies of the test results.

(g) If the commissioner allows alternative test procedures in subsection (a)(1) or (c)(1)(B), such method shall be submitted to the U.S. EPA as a SIP revision.

(h) During compliance tests conducted under 326 IAC 3-6 (stack testing), each vapor balance or control system shall be tested applying the standards described in subsection (c)(1)(B). Testers shall use 40 CFR 60, Appendix A, Method 21 to determine if there are any leaks from the hatches and the flanges of the gasoline transports. If any leak is detected, the transport cannot be used for the capacity of the compliance test of the bulk gas terminal. The threshold for leaks shall be as follows:

(1) Five hundred (500) parts per million methane for all bulk gas terminals subject to NESHAP/MACT (40 CFR 63, Subpart R).

(2) Ten thousand (10,000) parts per million methane for all bulk gas terminals subject to a New Source Performance Standard.

326 IAC 8-9 Volatile Organic Storage Vessels

Storage Vessels located at bulk gasoline plants are exempt from this rule pursuant to 326 IAC 8-9-2 (Exemptions).

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The compliance monitoring requirements applicable to the operation of the vapor recovery unit and the vapor combustor are as follows:

(a) When operating the VRU to control VOC emissions during loading at the truck loading rack, the Permittee shall monitor and continuously record the carbon bed pressure on a recording device indicating the regeneration cycle. The carbon bed shall be regenerated once every fifteen (15) minutes during active loading or once every five (5) tanker trucks loaded during slack periods when the VRU is in idle mode.

The Permittee shall operate and maintain an automated system to monitor the number of trucks loaded since the last regeneration cycle of the carbon bed. Whenever the VRU is in idle mode the automated system shall shut down the loading rack, if the VRU fails to go through a regeneration cycle after loading five (5) tanker trucks.

The Permittee shall conduct a daily inspection of the carbon bed pressure recording device records for any deviations in the carbon bed regeneration cycle time mentioned above since the daily last inspection.

The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the regeneration cycle is outside of the above mentioned range for any one reading.

(b) The permittee shall install and maintain a monitor to detect the presence of a flame at the flare tip. The presence of a flame at the flare tip shall be monitored at all times when the vapors are being vented to the flare. The monitor shall be equipped with an automatic alarm to alarm when the presence of a flame is not detected when the vapors are being vented to the flare.

The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the visible emissions notations are abnormal for any one observation.

(c) Each calendar month, the vapor collection system, the vapor control system, and each loading rack that loads gasoline tank trucks shall be inspected for total organic compounds liquid or vapor leaks during product transfer operations. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. [40 CFR Part 60.502(j)] [326 IAC 8-4-9(d)]

The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when total organic compounds liquid and vapor leaks are detected.

Conclusion
The operation of this petroleum product loading terminal shall be subject to the conditions of the attached proposed (FESOP No. F097-15266-00078)

Emission Inventory - Terminal Summary

(Range: summary)
05/05/2003

Terminal: Speedway, IN

Date: Proposed FESOP 2002

Rack: Potential	Actual Gallons
Gasoline	315,000,000
Fuel Oil	500,000,000
Total OTR:	*815,000,000*

Tank: Other	
Contact Water	500,000

VOC Emissions	-- ACTUAL -- (Tons/Year)					
	Gas	**Fuel**	**T-Mix**	**Additives**	**Ethanol**	**Totals**
From Tanks 4.0 Program: *AP-42*	24.53	2.80	1.34	0.31	1.69	
Subtotal-Tanks	24.53	2.80	1.34	0.31	1.69	30.66
From Oil/Water Separator				Contact Water:	1.25	1.25
From Water Accumulation Tanks				Contact Water:	0.11	0.11
Rack: w/ VCS: *AP-42 **		0.09				
Rack: w/ VCS: *Stack Test*	46.00					
Rack: during VCS Downtime: *AP-42*	0.00	0.00				
Rack: during Portable Flare Usage:	0.00	0.000				
Subtotal-Rack	46.00	0.09				46.10
Terminal Fugitives:	1.77					
Tank Truck Fugitives: ***mg/L***	17.09	***13.00***				
Subtotal-Fugitives	18.86					18.86
Garage Parts Cleaning	0.16					0.16
Garage Truck Degassing	2.52					2.52
VOC Totals Per Terminal:	**89.39**	**2.89**	**1.34**	**0.31**	**2.94**	**99.65**

OTR Gallons from Thruput System
Thruput-Other Gallons from the Terminal
Wastewater Gallons from Waste Tracking Program

Proposed Permit Limits: F097-5515-00078

Emissions (entire Source):		
Any regulated pollutant (VOC):	100 tons	
HAPS:		
Combination of HAPS:	25 tons/year	
Individual HAP:	10 ton/year	
Throughput Limits:		
Loading rack:		
Gasoline:	315,000,000 proposed	gal/365
VOC Emissions:		

Hazardous Air Pollutants (HAPS) Actuals TPY (sheet totals)	
Normal Gasoline/Diesel	4.8337
Reformulated Gasoline w/ MTBE	0.0000
Reformulated Gasoline w/out MTBE	0.0000
TOTAL HAPS:	**4.8337**
Summary	
Total HAPS:	
Total for Normal Gasoline/Diesel	4.8337
Single HAP (largest):	
HEXANE	1.4785

Other Emissions (tons/yr)		
	NOX	**CO**
Flare	0.00	0.00

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* Loading rack totals are based on Stack Test results for gasoline and AP-42 for fuel oil.

Terminal: Speedway, IN

Emission Inventory - Tank Thruputs

Proposed FESOP 2002

05/05/2003 13:08

Note: All tank throughput info taken from K56602-REPORT1 except misc. additive & dye tanks

Tank ID	Product Stored	TANK DATA: Type Roof	"Working" Capacity From OIS (Barrels)	"Working" Capacity From OIS (Gallons)	Estimated Tank Thruput (Gallons)	Estimated Turn-Overs (Per Year)	Estimated Tank Gallons (Per Month)	* TANK EMISSIONS * from US EPA Tanks Program: Total (Lbs.)	Total (Tons)	Months Tank is OUT of Service (If applicable)
AA-1-4	Dye	HFR	20	840	4,200	5.0		1.67	0.001	
AA-4-3	Farmland Dsl Add.	HFR	95	3,990	10,000	2.5		80.32	0.040	
AA-1-5	Jet De-Icer	HFR	33	1,386	6,900	5.0		62.89	0.031	
AA-4-6	Diesel Flow Imp.	HFR	96	4,032	10,000	2.5		0.00	0.000	
AA-8-1	Brand	VFR		7,770	4,200	0.5		196.75	0.098	
AA-10-2	Wholesale	VFR		10,363	10,000	1.0		271.62	0.136	
HA-2-1	Used Oil	HFR		1,504	6,900	4.6		0.01	0.000	
55-11	Gasoline	IFR-MS		2,153,508	88,293,828	41.0		10,005.63	5.003	
80-13	Gasoline	IFR-MS		3,233,538	132,575,058	41.0		12,025.88	6.013	
80-14	Gasoline/Fuel Oil	IFR-MS		3,232,110	132,516,510	41.0		12,025.60	6.013	Swing Tank: gas/fuel oil
20-1	No. 2 Fuel Oil	VFR		755,531	0	0.0		0.00	0.000	Permanently Out of Service
20-2	K-1 Kerosine	VFR		736,176	11,042,640	15.0		354.16	0.177	
20-3	No. 2 Fuel Oil	VFR		709,800	0	0.0		0.00	0.000	Permanently Out of Service
20-4	No. 2 Fuel Oil	VFR		752,388	66,210,144	88.0		649.83	0.325	
20-7	No. 2 Fuel Oil	VFR		758,730	66,768,240	88.0		654.48	0.327	
20-9	No. 2 Fuel Oil	VFR		755,531	0	0.0		0.00	0.000	Permanently Out of Service
55-10	No. 2 Fuel Oil	VFR		2,184,504	192,236,352	88.0		1,880.21	0.940	
55-5	Gasoline	IFR-FW		2,112,768	86,623,488	41.0		14,668.42	7.334	
RB-8-1	No. 2 Fuel Oil	HFR-UST		7,644	382,200	50.0		4.45	0.002	
55-8	Aviation Jet	VFR		2,127,720	187,239,360	88.0		2,057.25	1.029	
80-12	Aviation Jet	IFR-FW		3,229,800	132,421,800	41.0		332.01	0.166	In Jet Fuel Service Only
T-15	Transmix	IFR		100,590	5,029,500	50.0		2,677.02	1.339	
O-30-1	Ethanol	VFR		28,770	5,236,140	182.0		1,121.82	0.561	
O-30-2	Ethanol	VFR		28,770	5,236,140	182.0		1,121.82	0.561	
O-30-3	Ethanol	VFR		28,770	5,236,140	182.0		1,130.14	0.565	
Tank T-6 was dismantled in 2001 and removed from property										
WA-12-1 & WA-12-2: water accumulation tanks										
								61,321.98	**30.66**	

Tank Gasoline Throughput: 439,914,174

Emission Inventory - VR Downtime *(Yrly Detail)*

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Terminal: Speedway, IN Date: Proposed FESOP 2002

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(Range: VRDOWN_DETAIL)

Downtime Dates (xx/xx/xx)	*Gasoline*							
	TVP	RVP	Temp	Mol Wt.	Thruput (Actual)	Hours	Gasoline - EE lbs.	Gasoline - EE tons
							0.00	0.00

Fuel Oil						
TVP	Temp	Mol Wt.	Thruput (Actual)	Hours	Fuel Oil - EE lbs.	Fuel Oil - EE tons
					0.00	0.0000
					0.00	0.0000
					0.00	0.0000
					0.00	0.0000
					0.00	0.0000
					0.00	0.00

Emissions - Portable Flare Usage

(Range: Flare)

TERMINAL LOCATION: Speedway, IN **DATE:** Proposed FESOP 2002

MATERIAL LOADED: **Gasoline** **BY:** Leslie Trentman

Submerged Loading:

MODE: Tank Truck Loading, Dedicated Normal Service

Thruput	**0.00**	1000 gals, Thruput	- Actual Thruput

VOC: Emission Estimate (EE)

EE = L x Thruput *{lb. of VOC emission}*

	35.00	mg/L Gasoline Loaded
L	**0.292085**	**lb/1000 gallon loaded**

Emission	**0.00**	**lbs. VOC**
Estimate	**0.00**	**tons VOC**

NOX: Emission Estimate (EE)

EE = L x Thruput *{lb. of NOX emission}*

L	**0.0334**	**lb/1000 gallon loaded**

Emission	**0.00**	**lbs. VOC**
Estimate	**0.00**	**tons VOC**

CO: Emission Estimate (EE)

EE = L x Thruput *{lb. of CO emission}*

L	**0.0835**	**lb/1000 gallon loaded**

Emission	**0.00**	**lbs. VOC**
Estimate	**0.00**	**tons VOC**

Emissions - Portable Flare Usage

TERMINAL LOCATION: Speedway, IN **DATE:** Proposed FESOP 2002

MATERIAL LOADED: **Fuel Oil** **BY:** Leslie Trentman

Submerged Loading:

MODE: Tank Truck Loading, Dedicated Normal Service

AP-42 Section 5.2 TRANSPORTATION AND MARKETING OF PETROLEUM LIQUIDS 1/95

Loading Petroleum Liquid - Estimated Emissions (EE)

$$L = \frac{12.46\ SPM\ (1 - \%eff/100)}{T}$$ *{lb/1000 gal of liquid loaded}* EE = L x Thruput *{lb. of VOC emission}*

VOC: Emission Estimate (EE)

FUEL OIL LOADING (while Flare was in operation)

WHERE

S	1	Saturation Factor *(See Table 5.2-1)*
P	0.0000	True Vapor Pressure of Liquid Loading, psia (Figures 7.1-5, 7.1-6, & Table 7.1-2) RVP = n/a Actual / Average Temp = 0 Actual / Average
M	0	Molecular Weight of Vapors, lb/lb - mole (Table 7.1-2)
T	459.69	Temperature of Bulk Liquid Loaded, R (F + 460)
%eff	0	VRU Control Efficiency: 0.00 Actual
L	**0.000**	**lb/1000 gal loaded**
Thruput	0	1000 gal, Actual. 0 Actual Thruput

ESTIMATED	**0.00**	**lbs. VOC**
EMISSIONS	**0.00**	**tons VOC**

Loading Rack Operation w/ Control

Select Type of Unit:

Form Currently Selected: VRU

[Most Recent Unit Test Date:	E. Calc	*
[Results: -- Emis.Rate (mg/L)	35.00	*
[-- Efficiency (%)	95.63	*

* If this data is not available, the "generic" AP42 form MUST be used. Select *'button'* below.

[	TVP	RVP	Temp	Mol. Wt.	Sat. Factor
[- Gasoline Data Req'd:	5.40	12.00	52.1	63	0.60
[- Fuel Oil Data Req'd:	0.0045		52.1	130	(1 or 0.60)

1 = Vapor Balance

.60 = Normal Service

Emissions - Water Accumulation Tank

########
(Range: water)

TERMINAL LOCATION: Speedway, IN

DATE: Proposed FESOP 2002

MATERIAL LOADED: Contact Water

BY: W.J. Day

MODE: Tanks Equipped with Air Sparging

Emission Estimate (EE)

50 ppm = 50 lbs. VOC / 1,000,000 lbs. water

0.42	lbs. VOC / 1000 gal water	
500.00	1000 gallons water	500,000 Actual Thruput

Emission	**210.00**	**lbs. VOC**
Estimate	**0.11**	**tons VOC**

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Emissions - Oil/Water Separator

TERMINAL LOCATION: Speedway, IN **DATE:** Proposed FESOP 2002

MATERIAL LOADED: Contact Water **BY:** W.J. Day

MODE: Uncontrolled VOC Emissions

Emission Estimate (EE)

EE = 5 lbs. / 1000 gallons of wastewater (AP42 - Table 9.1-2)

5.00	lbs. VOC / 1000 gal water	
500.00	1000 gallons water	500,000 Actual gals. of water

Emission	**2,500.00**	**lbs. VOC**
Estimate	**1.25**	**tons VOC**

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Emissions - Tank Truck Fugitives

TERMINAL LOCATION: Speedway, IN **DATE:** Proposed FESOP 2002

MATERIAL LOADED: Gasoline **BY:** W.J. Day

Emission Estimate (EE)

EE = Gasoline OTR Gallons x Emission Factor

Factor = (___ mg/liter) x (1 lb./453600 mg) x (3.785 liters/gallon)

Gasoline	315,000	1000 gals, OTR Gasoline	
Factor	0.1085	Emission Factor *	13.0 mg/L

Emission	**34,170.14**	**lbs. VOC**
Estimate	**17.09**	**tons VOC**

* 9.0 mg/l: Emission Factor from Radian Corporation letter dated April 24, 1995.

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HAPS Calculation Sheet

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(Range: hapcalc)

Terminal: Speedway, IN Year: Proposed FESOP 2002

Actual Emissions From:

	* Tank	** Rack	*** Fugitives	*TOTAL*
Gasoline	27.53	46.00	18.86	*92.39*
Fuel Oil	2.80	0.09	n/a	*2.89*
				0.00
				0.00
Total	*30.33*	*46.10*	*18.86*	*95.28*

* Included in Gasoline "Tank" emissions are emissions from all gasoline tanks, transmix tanks, additive tanks, water tanks^, and OWS emissions^. Ethanol is not included because it is NOT a HAP! NOTE: ^=only if applicable!!

** Included in Rack emissions are totals from Loading Rack (stack test) while VRU was in operation, from AP-42 while VRU was down, any VOC emissions from Portable Flare.

*** Included in Fugitive Emissions are Terminal Fugitives and Tank Truck Fugitives.

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HAZARDOUS AIR POLLUTANT (HAP) ESTIMATION SHEET

(Range: HAPnorm)

05/05/2003

TERMINAL Speedway, IN

TIME PERIOD Proposed FESOP 2002

EMISSIONS FROM GASOLINE SOURCES: 92.39 TONS/YEAR
EMISSIONS FROM DIESEL/DISTILLATE SOURCES: 2.89 TONS/YEAR

		AVERAGE VAPOR WT %		HAP ESTIMATED EMISSIONS		HAP TOTALS	
CAS NO.	HAP NAME	NORMAL GASOLINE	DIESEL	GASOLINE LB/YR	DIESEL LB/YR	TOTAL LB/YR	TOTAL TON/YR
71432	BENZENE	0.9	0.02	1662.97	1.16	**1664.13**	**0.8321**
100414	ETHYLBENZENE	0.1	0.04	184.77	2.31	**187.09**	**0.0935**
110543	HEXANE	1.6	0.01	2956.40	0.58	**2956.98**	**1.4785**
108883	TOLUENE	1.3	0.26	2402.07	15.05	**2417.12**	**1.2086**
540841	TRIMETHYLPENTANE (2,2,4)	0.8	0	1478.20	0.00	**1478.20**	**0.7391**
1330207	XYLENE	0.5	0.69	923.87	39.93	**963.81**	**0.4819**
TOTALS:				**9,608.29**	**59.03**	**9,667.32**	**4.8337**

- Speciated data from BIDS document for the Gasoline Distribution Industry.
- Specific pollutants for diesel have been updated per K. Ritter's letter dated 2/8/95.

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