



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

April 5, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Citgo Petroleum Corporation / F069-15724-00004

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FNPER.dot 9/16/03



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## FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Citgo Petroleum Corporation  
4393 North Meridian Road  
Huntington, Indiana 46750**

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

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

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

Operation Permit No.: F 069-15724-00004	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 5, 2004  Expiration Date: April 5, 2009

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## SECTION A

## SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary bulk gasoline terminal.

Authorized individual: Terminal Manager  
Source Address: 4393 North Meridian Road, Huntington, Indiana 46750  
Mailing Address: 4393 North Meridian Road, Huntington, Indiana 46750  
General Source Phone: 219-356-6824  
SIC Code: 5171  
Source Location Status: Huntington County  
Attainment for all criteria pollutants  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD Rules;  
Minor Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) tank truck loading rack, identified as LR1, constructed in 1963 and modified in 1983, capacity: 919,800,000 gallons of petroleum products and/or ethanol per year.

This loading rack consists of the following:

- (1) One (1) loading bay, identified as Bay No. 1, equipped with two (2) gasoline and/or ethanol loading arms, two (2) distillate (any petroleum product with a vapor pressure less than 1.5 psia) and/or ethanol loading arms of which four (4) can operate at any one (1) time, venting to one (1) vapor collection system, identified as LRFUG, with one (1) liquid propane gas-fired vapor combustion unit, identified as VCU, rated at 0.217 million British thermal units per hour, for VOC control, capacity: 600 gallons per minute per loading arm.
- (2) One (1) loading bay, identified as Bay No. 2, equipped with two (2) gasoline and/or ethanol loading arms as well as three (3) distillate (any petroleum product with a vapor pressure less than 1.5 psia) and/or ethanol loading arms of which four (4) can operate at any one (1) time, venting to one (1) vapor collection system, identified as LRFUG, with one (1) liquid propane gas-fired vapor combustion unit, identified as VCU, rated at 0.217 million British thermal units per hour, for VOC control, capacity: 600 gallons per minute per loading arm.
- (b) One (1) internal floating roof storage tank, identified as Tank No. 1, constructed in 1963, storing gasoline, ethanol, and/or distillates (any petroleum product with a vapor pressure less than 1.5 psia), exhausting to Vent TK-1, capacity: 3,157,000 gallons.
- (c) One (1) internal floating roof storage tank, identified as Tank No. 2, storing gasoline, ethanol, and/or distillates (any petroleum product with a vapor pressure less than 1.5 psia), constructed in 1963, exhausting to Vent TK-2, capacity: 1,057,669 gallons.

- (d) One (1) fixed coned roof distillate (any petroleum product with a true vapor pressure less than 1.50 psia) storage tank, identified as Tank No. 3, constructed in 1963, exhausting to Vent TK-3, capacity: 1,488,424 gallons.
- (e) One (1) internal floating roof storage tank, identified as Tank No. 4, constructed in 1963, storing gasoline, ethanol, and/or distillates (any petroleum product with a vapor pressure less than 1.5 psia), exhausting to Vent TK-4, capacity: 1,050,000 gallons.
- (f) One (1) fixed coned roof ethanol and/or distillate (any petroleum product with a true vapor pressure less than 1.50 psia) storage tank, identified as Tank No. 5, constructed in 1963, exhausting to Vent TK-5, capacity: 42,142 gallons.
- (g) One (1) internal floating roof petroleum products storage tank, identified as Tank No. 6, storing gasoline, ethanol, and/or distillates (any petroleum product with a vapor pressure less than 1.5 psia), constructed in 1977, exhausting to Vent TK-6, capacity: 2,310,000 gallons.
- (h) One (1) fixed coned roof ethanol and/or distillate (any petroleum product with a true vapor pressure less than 1.50 psia) storage tank, identified as Tank No. 7, constructed in 1981, exhausting to Vent TK-7, capacity: 29,614 gallons.

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) One (1) liquid propane gas-fired space heater, heat input capacity: 0.100 million British thermal units per hour.
- (b) Process piping, containing pumps, flanges, valves, and other processes.
- (c) Two (2) horizontal above ground fuel additive storage tanks, identified as Tank Nos. 8 and 9, constructed in 1994, capacity: 1,000 gallons, each.
- (d) One (1) horizontal above ground fuel additive storage tank, identified as Tank No. 10, constructed in 1997, capacity: 2,000 gallons.
- (e) One (1) horizontal above ground transmix (pour back) storage tank, identified as Tank No. 11, constructed in 2002, capacity: 1,000 gallons
- (f) One (1) vertical above ground petroleum contact water (spillage and rain water from loading rack) storage tank, identified as Tank No. 12, constructed in 1981, capacity: 12,523 gallons.
- (g) One (1) horizontal above ground transmix (slop) storage tank, identified as Tank No. 14, constructed in 1981, capacity: 1,000 gallons.
- (h) One (1) horizontal above ground fuel additive storage tank, identified as Tank No. 15, constructed in 1983, capacity: 10,000 gallons.
- (i) Paved and unpaved roads and parking lots with public access.

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

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

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

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- (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) deletedby 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)] [326 IAC 2-1.1-9.5]

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

### 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, 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 Provide Information [326 IAC 2-8-4(5)(E)]

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

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

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

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

### B.10 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.11 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 July 1 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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, 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.12 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 maintain and implement Preventive Maintenance Plans (PMPs), 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.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 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, 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

- (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

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, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
  - (g) Operations may continue during an emergency only if the following conditions are met:
    - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
    - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
      - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
      - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.14** 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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a 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 determines any of the following:

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

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

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

**B.16** Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-

1(21) and 326 IAC 2-7-1(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

(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, on or before the date it is due.

(2) If IDEM, OAQ, 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 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, any additional information identified as needed to process the application.

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

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

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

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

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)]

(d) No permit amendment or modification is required for the addition, operation or removal of a

nonroad engine, as defined in 40 CFR 89.2.

**B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]**

(a) The Permittee may make any change or changes at 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

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

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

- (5) The Permittee maintains records on-site 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, 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.19 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.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]**

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

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

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 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, 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

<b>Entire Source</b>
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### 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, particulate matter emissions 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 one hundred (100) pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than one hundred (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 satisfy the requirements of 326 IAC 2-3 (Emission Offset);
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

C.7 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 unit vented to the control equipment is 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 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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 to use an Indiana Accredited Asbestos inspector is not 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 recordkeeping 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 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing 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.

#### **C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

### **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]**

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

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

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- (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 is 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 time frame 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:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) 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, and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ 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 be considered a deviation from 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, in accordance with Section D, 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 response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**C.17 General Recordkeeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all recordkeeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. 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 IAC 2-1.1-1(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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) 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.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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)]: Loading Rack

- (a) One (1) tank truck loading rack, identified as LR1, constructed in 1963 and modified in 1983, capacity: 919,800,000 gallons of petroleum products and/or ethanol per year.

This loading rack consists of the following:

- (1) One (1) loading bay, identified as Bay No. 1, equipped with two (2) gasoline and/or ethanol loading arms, two (2) distillate (any petroleum product with a vapor pressure less than 1.5 psia) and/or ethanol loading arms of which four (4) can operate at any one (1) time, venting to one (1) vapor collection system, identified as LRFUG, with one (1) liquid propane gas-fired vapor combustion unit, identified as VCU, rated at 0.217 million British thermal units per hour, for VOC control, capacity: 600 gallons per minute per loading arm.
- (2) One (1) loading bay, identified as Bay No. 2, equipped with two (2) gasoline and/or ethanol loading arms as well as three (3) distillate (any petroleum product with a vapor pressure less than 1.5 psia) and/or ethanol loading arms of which four (4) can operate at any one (1) time, venting to one (1) vapor collection system, identified as LRFUG, with one (1) liquid propane gas-fired vapor combustion unit, identified as VCU, rated at 0.217 million British thermal units per hour, for VOC control, capacity: 600 gallons per minute per loading arm.

(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 60, Subpart A]

The provisions of 40 CFR 60 Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to the north and south loading racks described in this section except when otherwise specified in 40 CFR Part 60.500, Subpart XX.

#### D.1.2 Standard for Volatile Organic Compound (VOC) Emissions From Bulk Gasoline Terminals, Subpart XX [40 CFR 60.502] [326 IAC 12-1]

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 thirty-five (35) milligrams of total organic compounds per liter of gasoline loaded.
- (c) Each vapor collection system shall be designed to prevent any total organic compounds 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 paragraph (d)(2) with the file of tank vapor tightness documentation within two (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 twenty-six (26) weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or
  - (B) If less than an average of one gasoline tank truck per month over the last fifty-two (52) weeks is loaded without vapor tightness documentation then the documentation 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 one (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 documentation for that tank is obtained.
- (6) Alternate procedures to those described in paragraphs (d)(1) through (5) for limiting 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 prevent 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 arm 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 fifteen (15) calendar days after it is detected.

**D.1.3 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4] [40 CFR 63, Subpart R] [326 IAC 20] [326 IAC 2-2]**

Pursuant to 326 IAC 2-8-4, the following emission limitations apply:

- (a) The total throughput of gasoline and/or ethanol at the one (1) loading rack, identified as LR1 shall be limited to a total of 250,000,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month at an emission rate of 0.495 pounds of VOC per thousand (1,000) gallons, equivalent to 61.9 tons of VOC per year. This throughput in combination with the emission factor limits the potential to emit VOC from the entire source to less than one hundred (100) tons per year.
- (b) This throughput also limits the potential to emit of any individual HAP to a total of 2.10 tons per year, any combination of HAPs to a total of 2.78 tons per year from the loading racks and less than ten (10) tons per year for each individual HAP and twenty-five (25) tons per year of any combination of HAPs from the entire source.

Compliance with these emission limits in combination with the potential to emit in Condition D.2.1 shall render the requirements of 326 IAC 2-7, 326 IAC 20-1, 40 CFR 63, Subpart R, and 326 IAC 2-2 not applicable.

**D.1.4 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 the one (1) loading rack, identified as LR1, and the vapor collection system with the vapor combustion unit (VCU).

**Compliance Determination Requirements**

**D.1.5 VOC and HAPs**

In order to comply with Conditions D.1.2 and D.1.3, the vapor combustion unit (VCU) with the vapor collection system for VOC and HAPs control shall be in operation and control emissions from the one (1) loading rack, identified as LR1, at all times gasoline and/or ethanol, is being loaded.

**D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]**

To demonstrate compliance with Conditions D.1.2 and D.1.3, a compliance stack test shall be performed by September 26, 2007 which corresponds to five (5) years since the latest valid stack test at the vapor combustion unit (VCU) with the vapor control system. This test shall be performed according to 40 CFR 60, Appendix A, Methods 25A and 25B as well as the procedures in Condition D.1.7.

**D.1.7 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 (h), 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 six (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 six (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 six (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 five (5) minutes.

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

- (4) The performance test shall be conducted in intervals of five (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:
  - (A) Method 2B shall be used for combustion vapor processing systems.
  - (B) 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 Permittee shall determine compliance with the standard in 40 CFR 60.502(h) as follows:
- (1) A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with  $\pm 2.5$  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.
  - (2) During the performance test, the pressure shall be recorded every five (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.1.8 Vapor Combustion Unit Operation**

To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall perform daily checks of the pilot flame presence at the vapor combustion unit (VCU).

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

#### **D.1.9 Record Keeping Requirements [326 IAC 2-8-4]**

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain records at the source of the volume (in gallons) of each fuel pumped through the loading rack, identified as LR1.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records at the terminal of the materials used that contain any HAPs. The records shall be complete and sufficient to establish compliance with the HAP emission limits in Condition D.1.3. The records shall contain a minimum of the following:
- (1) The HAP/VOC ratio of each fuel received;
  - (2) The weight of VOC, individual HAPs and total 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.
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain records of the pilot flame presence when the vapor combustion unit (VCU) is in use.

#### **D.1.10 NSPS Reporting Requirement [326 IAC 12-1] [Subpart XX, 40 CFR 60.500]**

Pursuant to the New Source Performance Standards (NSPS), 40 CFR Part 60.500, Subpart XX, the Permittee is hereby advised of the requirement to report the following at the appropriate times:

- (a) Commencement of construction date (no later than 30 days after such date);
- (b) Actual start-up date (within 15 days after such date); and
- (c) Date of performance testing (at least 30 days prior to such date), when required by a condition elsewhere in this permit.



Reports are to be sent to:

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

The application and enforcement of these standards have been delegated to the IDEM OAQ. The requirements of 40 CFR Part 60 are also federally enforceable.

D.1.11 Reporting and Record Keeping [Subpart XX, 40 CFR 60.505] [326 IAC 12-1]

(a) 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:

- (1) Test title: Gasoline Delivery Tank Pressure Test--EPA Reference Method 27.
- (2) Tank owner and address.
- (3) Tank identification number.
- (4) Testing location.
- (5) Date of test.
- (6) Tester name and signature.
- (7) Witnessing inspector, if any: Name, signature, and affiliation.
- (8) Test results: Actual pressure change in 5 minutes, mm of water (average for two (2) runs).

(b) As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in paragraphs 40 CFR 60.505(a), (c), and (d), the Permittee shall comply with the requirements pursuant to 40 CFR 60.505(e)(2) as follows.

For facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by IDEM, OAQ representatives during the course of a site visit, or within a mutually agreeable time frame.

- (1) The copy of each record in 40 CFR 60.505(e)(2) is an exact duplicate image of the original paper record.
- (2) IDEM, OAQ was notified by the Permittee in writing on January 27, 2004, that the terminal using this alternative is in compliance with 40 CFR 60.505(e)(2).

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

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3, 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 quarter being reported.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

#### *Significant Storage Tanks*

- (b) One (1) internal floating roof storage tank, identified as Tank No. 1, constructed in 1963, storing gasoline, ethanol, and/or distillates (any petroleum product with a vapor pressure less than 1.5 psia), exhausting to Vent TK-1, capacity: 3,157,000 gallons.
- (c) One (1) internal floating roof storage tank, identified as Tank No. 2, storing gasoline, ethanol, and/or distillates (any petroleum product with a vapor pressure less than 1.5 psia), constructed in 1963, exhausting to Vent TK-2, capacity: 1,057,669 gallons.
- (d) One (1) fixed coned roof distillate (any petroleum product with a true vapor pressure less than 1.50 psia) storage tank, identified as Tank No. 3, constructed in 1963, exhausting to Vent TK-3, capacity: 1,488,424 gallons.
- (e) One (1) internal floating roof storage tank, identified as Tank No. 4, constructed in 1963, storing gasoline, ethanol, and/or distillates (any petroleum product with a vapor pressure less than 1.5 psia), exhausting to Vent TK-4, capacity: 1,050,000 gallons.
- (f) One (1) fixed coned roof ethanol and/or distillate (any petroleum product with a true vapor pressure less than 1.50 psia) storage tank, identified as Tank No. 5, constructed in 1963, exhausting to Vent TK-5, capacity: 42,142 gallons.
- (g) One (1) internal floating roof petroleum products storage tank, identified as Tank No. 6, storing gasoline, ethanol, and/or distillates (any petroleum product with a vapor pressure less than 1.5 psia), constructed in 1977, exhausting to Vent TK-6, capacity: 2,310,000 gallons.
- (h) One (1) fixed coned roof ethanol and/or distillate (any petroleum product with a true vapor pressure less than 1.50 psia) storage tank, identified as Tank No. 7, constructed in 1981, exhausting to Vent TK-7, capacity: 29,614 gallons.

#### *Insignificant Storage Tanks*

- (c) Two (2) horizontal above ground fuel additive storage tanks, identified as Tank Nos. 8 and 9, constructed in 1994, capacity: 1,000 gallons, each.
- (d) One (1) horizontal above ground fuel additive storage tank, identified as Tank No. 10, constructed in 1997, capacity: 2,000 gallons.
- (e) One (1) horizontal above ground transmix (pour back) storage tank, identified as Tank No. 11, constructed in 2002, capacity: 1,000 gallons
- (f) One (1) vertical above ground petroleum contact water (spillage and rain water from loading rack) storage tank, identified as Tank No. 12, constructed in 1981, capacity: 12,523 gallons.
- (g) One (1) horizontal above ground transmix (slop) storage tank, identified as Tank No. 14, constructed in 1981, capacity: 1,000 gallons.
- (h) One (1) horizontal above ground fuel additive storage tank, identified as Tank No. 15, constructed in 1983, capacity: 10,000 gallons.
- (i) Paved and unpaved roads and parking lots with public access.

(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.2.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4] [40 CFR 63, Subpart R] [326 IAC 20] [326 IAC 2-2]**

- (a) Any change or modification that increases the potential to emit VOC to more than 37.1 tons per year from the fourteen (14) storage tanks, identified as Tanks No. 1 through 12, 14, and 15, may increase the potential to emit VOC from entire source to greater one hundred (100) tons per year and render the requirements of 326 IAC 2-7 applicable, and shall require prior IDEM, OAQ approval.
- (b) Any change or modification which increases the potential to emit of any individual HAP to more than 7.90 tons per year or any combination of HAPs to more than 22.1 tons per year from Tanks No. 1 through 12, 14, and 15, may increase the potential to emit of any single HAP from the entire source to greater than ten (10) tons per year and the potential to emit of any combination of HAPs from the entire source to greater than twenty-five (25) tons per year and render the requirements 326 IAC 2-7 as well as 40 CFR 63 Subpart R applicable, and shall require prior IDEM, OAQ, approval.

Compliance with these emission limits in combination with the emission limits in Condition D.1.3 shall render the requirements of 326 IAC 2-7, 326 IAC 20-1, 40 CFR 63, Subpart R, and 326 IAC 2-2 not applicable.

#### **D.2.2 Storage Vessel New Source Performance Standard [40 CFR Part 60.110, Subpart K] [326 IAC 12]** Pursuant to 40 CFR 60.110, Subpart K, the storage tank identified as Tank No. 6 shall be equipped with a floating roof, a vapor recovery system, or the equivalents at all times.

### **Compliance Determination Requirements**

There are no specific Compliance Determination Requirements applicable to these emission units.

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

There are no specific Compliance Monitoring Requirements applicable to these emission units.

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

#### **D.2.3 Record Keeping Requirements**

To document compliance with Conditions D.2.1, the Permittee shall maintain records for each tank of the following:

- (a) The amount of each fuel stored and the Material Safety Data Sheets (MSDSs) for each fuel.
- (b) The weight of VOCs, each individual HAP and total HAPs emitted for each month.

#### **D.2.4 Record Keeping Requirement [40 CFR Part 60.110, Subpart K] [326 IAC 12]**

Pursuant to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110, Subpart K), the Permittee 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 period at the internal floating roof storage tank identified as Tank No. 6.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Citgo Petroleum Corporation  
Source Address: 4393 North Meridian Road, Huntington, Indiana 46750  
Mailing Address: 4393 North Meridian Road, Huntington, Indiana 46750  
FESOP No.: F 059-15724-00004

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) \_\_\_\_\_
- Report (specify) \_\_\_\_\_
- Notification (specify) \_\_\_\_\_
- Affidavit (specify) \_\_\_\_\_
- Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Citgo Petroleum Corporation  
Source Address: 4393 North Meridian Road, Huntington, Indiana 46750  
Mailing Address: 4393 North Meridian Road, Huntington, Indiana 46750  
FESOP No.: F 059-15724-00004

**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) working 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 <sub>10</sub> , SO <sub>2</sub> , VOC, NO <sub>x</sub> , 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: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Citgo Petroleum Corporation  
 Source Address: 4393 North Meridian Road, Huntington, Indiana 46750  
 Mailing Address: 4393 North Meridian Road, Huntington, Indiana 46750  
 FESOP No.: F 059-15724-00004  
 Facility: Loading Rack (LR1)  
 Parameter: Petroleum products with true vapor pressure of 1.50 psia or greater and/or ethanol throughput  
 Limit: A total of 250,000,000 gallons of gasoline and/or ethanol per twelve (12) consecutive month period with compliance determined at the end of each month, total at a VOC emission rate of 0.495 pounds per thousand (1000) gallons, equivalent to 61.9 tons of VOC per year, 2.10 tons of any individual HAP per year, any 2.79 tons of any combination of HAPs per year

YEAR: \_\_\_\_\_

Month	Gasoline and/or ethanol (gallons)	Gasoline and/or ethanol (gallons)	Gasoline and/or ethanol (gallons)
	This Month	Previous 11 Months	12 Month Total

- 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: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

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

Source Name: Citgo Petroleum Corporation  
Source Address: 4393 North Meridian Road, Huntington, Indiana 46750  
Mailing Address: 4393 North Meridian Road, Huntington, Indiana 46750  
FESOP No.: F 059-15724-00004

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

<p>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".</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input checked="" type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	

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

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

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

**Source Name:** Citgo Petroleum Corporation  
**Source Location:** 4393 North Meridian Road, Huntington, Indiana 46750  
**County:** Huntington  
**FESOP:** F 069-15724-00004  
**SIC Code:** 5171  
**Permit Reviewer:** Michael S. Schaffer

On February 13, 2004, the Office of Air Quality (OAQ) had a notice published in the Herald Press, Huntington, Indiana, stating that Citgo Petroleum Corporation had applied for a Federally Enforceable State Operating Permit (FESOP) renewal to operate a stationary bulk gasoline terminal with a vapor collection system for VOC control. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP 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 FESOP should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the FESOP renewal. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

#### Change 1:

The language in Condition C.12 (Monitoring Methods) will be revised as follows:

C.12 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.

#### Change 2:

The language in Condition C.14 (Risk Management Plan) will be revised as follows

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]  
 If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the ~~source~~ **Permittee** must comply with the applicable requirements of 40 CFR 68.

#### Change 3:

The language in Condition C. 18 (General Reporting Requirements) will be revised as follows:

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]  
 (a) The ~~source~~ **Permittee** 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 IAC 2-1.1-1(1).

Indiana Department of Environmental Management  
Office of Air Quality

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

**Source Background and Description**

**Source Name:** Citgo Petroleum Corporation  
**Source Location:** 4393 North Meridian Road, Huntington, Indiana 46750  
**County:** Huntington  
**SIC Code:** 5171  
**Operation Permit No.:** F 069-15724-00004  
**Permit Reviewer:** Michael S. Schaffer

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Citgo Petroleum Corporation relating to the operation of a bulk gasoline terminal. Citgo Petroleum Corporation was issued FESOP 069-7564-00004 on June 12, 1998.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) tank truck loading rack, identified as LR1, constructed in 1963 and modified in 1983, capacity: 919,800,000 gallons of petroleum products and/or ethanol per year.

This loading rack consists of the following:

- (1) One (1) loading bay, identified as Bay No. 1, equipped with two (2) gasoline and/or ethanol loading arms, two (2) distillate (any petroleum product with a vapor pressure less than 1.5 psia) and/or ethanol loading arms of which four (4) can operate at any one (1) time, venting to one (1) vapor collection system, identified as LRFUG, with one (1) liquid propane gas-fired vapor combustion unit, identified as VCU, rated at 0.217 million British thermal units per hour, for VOC control, capacity: 600 gallons per minute per loading arm.
- (2) One (1) loading bay, identified as Bay No. 2, equipped with two (2) gasoline and/or ethanol loading arms as well as three (3) distillate (any petroleum product with a vapor pressure less than 1.5 psia) and/or ethanol loading arms of which four (4) can operate at any one (1) time, venting to one (1) vapor collection system, identified as LRFUG, with one (1) liquid propane gas-fired vapor combustion unit, identified as VCU, rated at 0.217 million British thermal units per hour, for VOC control, capacity: 600 gallons per minute per loading arm.
- (b) One (1) internal floating roof storage tank, identified as Tank No. 1, constructed in 1963, storing gasoline, ethanol, and/or distillates (any petroleum product with a vapor pressure less than 1.5 psia), exhausting to Vent TK-1, capacity: 3,157,000 gallons.
- (c) One (1) internal floating roof storage tank, identified as Tank No. 2, storing gasoline, ethanol, and/or distillates (any petroleum product with a vapor pressure less than 1.5 psia), constructed in 1963, exhausting to Vent TK-2, capacity: 1,057,669 gallons.
- (d) One (1) fixed coned roof distillate (any petroleum product with a true vapor pressure less

than 1.50 psia) storage tank, identified as Tank No. 3, constructed in 1963, exhausting to Vent TK-3, capacity: 1,488,424 gallons.

- (e) One (1) internal floating roof storage tank, identified as Tank No. 4, constructed in 1963, storing gasoline, ethanol, and/or distillates (any petroleum product with a vapor pressure less than 1.5 psia), exhausting to Vent TK-4, capacity: 1,050,000 gallons.
- (f) One (1) fixed coned roof ethanol and/or distillate (any petroleum product with a true vapor pressure less than 1.50 psia) storage tank, identified as Tank No. 5, constructed in 1963, exhausting to Vent TK-5, capacity: 42,142 gallons.
- (g) One (1) internal floating roof petroleum products storage tank, identified as Tank No. 6, storing gasoline, ethanol, and/or distillates (any petroleum product with a vapor pressure less than 1.5 psia), constructed in 1977, exhausting to Vent TK-6, capacity: 2,310,000 gallons.
- (h) One (1) fixed coned roof ethanol and/or distillate (any petroleum product with a true vapor pressure less than 1.50 psia) storage tank, identified as Tank No. 7, constructed in 1981, exhausting to Vent TK-7, capacity: 29,614 gallons.

#### **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) One (1) liquid propane gas-fired space heater, heat input capacity: 0.100 million British thermal units per hour.
- (b) Process piping, containing pumps, flanges, valves, and other processes.
- (c) Two (2) horizontal above ground fuel additive storage tanks, identified as Tank Nos. 8 and 9, constructed in 1994, capacity: 1,000 gallons, each.
- (d) One (1) horizontal above ground fuel additive storage tank, identified as Tank No. 10, constructed in 1997, capacity: 2,000 gallons.
- (e) One (1) horizontal above ground transmix (pour back) storage tank, identified as Tank No. 11, constructed in 2002, capacity: 1,000 gallons
- (f) One (1) vertical above ground petroleum contact water (spillage and rain water from loading rack) storage tank, identified as Tank No. 12, constructed in 1981, capacity: 12,523 gallons.
- (g) One (1) horizontal above ground transmix (slop) storage tank, identified as Tank No. 14, constructed in 1981, capacity: 1,000 gallons.
- (h) One (1) horizontal above ground fuel additive storage tank, identified as Tank No. 15, constructed in 1983, capacity: 10,000 gallons.

- (i) Paved and unpaved roads and parking lots with public access.

### Existing Approvals

The source has been operating under the following previous approvals including:

- (a) FESOP 069-7564-00004, issued on June 12, 1998,
- (b) First Administrative Amendment AAF 069-16476-00004, issued on April 30, 2003, and
- (c) Second Administrative Amendment AAF 069-18115-00004, issued on September 25, 2003.

All terms and conditions from previous approvals issued pursuant to the permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous approvals are superseded upon issuance of this permit.

The following terms and conditions from previous approvals have been revised in this permit:

- (a) FESOP 069-7564-00004, issued on June 12, 1998, Conditions D.1.1 and D.2.1:
  - (1) Pursuant to Operation Permit CP 35-05-90-0140, issued on January 30, 1987, and Amendment to Operation Permit CP 35-05-90-0140, issued on October 31, 1995, the throughput of gasoline distillates, ethanol, and additive to the storage tanks at the source shall each be limited to 172,982,000 gallons of gasoline, 150,000,000 gallons of distillates, 17,298,200 gallons of ethanol, and 17,298,200 gallons of additive per twelve (12) month period rolled on a monthly basis.
  - (2) The above throughput limits shall limit the total potential to emit of volatile organic compounds (VOC), single HAP, and total HAP emissions from the storage tanks to 24.0, 2.6, and 3.9 tons per year, respectively, such that source-wide emissions of VOC, worst case single HAP, and total HAPs are limited to less than 100, 10, and 25 tons per twelve (12) month period, rolled on a monthly basis, respectively. Therefore, the requirements of 326 IAC 2-7 and 40 CFR Part 63.410, Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.
  - (3) Pursuant to Operation Permit CP 35-05-90-0140, issued on January 30, 1987, and Amendment to Operation Permit CP 35-05-90-0140, issued on October 31, 1995, the loading of gasoline distillates, ethanol, and additive through the truck loading rack is limited to 172,982,000 gallons of gasoline, 150,000,000 gallons of distillates, 17,298,200 gallons of ethanol, and 17,298,200 gallons of additive per twelve (12) month period rolled on a monthly basis.
  - (4) The above throughput limits shall limit the total potential to emit of volatile organic compounds (VOC), single HAP, and total HAP emissions from the truck loading rack to 34.6, 4.1, and 5.9 tons per year, respectively, such that source-wide emissions of VOC, worst case single HAP, and total HAPs are limited to less than 100, 10, and 25 tons per twelve (12) month period, rolled on a monthly basis, respectively. Therefore, the requirements of 326 IAC 2-7 and 40 CFR Part 63.410, Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

Reason not incorporated: In order to allow more flexibility in operation of the bulk gasoline terminal, as part of this renewal, this source has elected to limit the potential to emit VOC

from the entire source to less than one hundred (100) tons per year by limiting only the loading rack throughput. Any change or modification to the storage tanks and/or insignificant activities that may increase the limited potential to emit to greater than Part 70 thresholds, will require prior IDEM, OAQ approval.

In order to render the requirements of 326 IAC 2-7 and the 40 CFR 63 Subpart R not applicable, as part of this renewal, the loading rack will be limited as follows:

- (1) The throughput of any petroleum product with a true vapor pressure of 1.50 psia or greater and/or ethanol at the one (1) truck loading rack, identified as LR1, will be limited to a total of 250,000,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month at an emission rate of 0.495 pounds per thousand (1,000) gallons of throughput, equivalent to 61.9 tons of VOC per year.
- (2) The throughput and emission factor limits are also equivalent to a potential to emit of 2.10 tons per year of any single HAP and 2.78 tons per year of any combination of HAPs from the one (1) truck loading rack.

The throughput limit in combination with the emission factor limit will ensure that the potential to emit VOC from the entire source is less than one hundred (100) tons per year, the potential to emit any single HAP from the entire source is less than ten (10) per year, and the potential to emit any combination of HAPs is less than twenty-five (25) tons per year, and renders the requirements of 326 IAC 2-7 and 40 CFR 60 Subpart R not applicable.

- (b) FESOP 069-7564-00004, issued on June 12, 1998, Condition D.2.3:

Pursuant to 326 IAC 8-4-4, the Permittee shall not permit the loading of gasoline into any transport unless:

- (1) The gasoline loading equipment is equipped with a vapor control system in good working order, which will control VOC emissions to the atmosphere from the equipment being controlled to no more than 80 milligrams per liter of gasoline loaded.
- (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.

If employees of the owner of the source 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 source shall take all responsible steps to insure that owners of transports loading at the terminal during unsupervised times comply with this rule.

Compliance with the VOC emission limit of 35 milligrams of total organic compounds per liter of gasoline loaded, pursuant to 40 CFR 60.502, Subpart XX, shall ensure compliance with the VOC emission limit of 80 milligrams per liter of gasoline loaded.

Reason not incorporated: Pursuant to 326 IAC 8-4-1(d), 326 IAC 8-4-2 through 8-4-5 and

326 IAC 8-4-7 through 8-4-9 applies to all new sources as of January 1, 1980. Since this source was constructed prior to January 1, 1980 in Huntington County, the requirements of 326 IAC 8-4-4 are not applicable.

(c) FESOP 069-7564-00004, issued on June 12, 1998, Condition D.2.4:

Pursuant to 326 IAC 8-4-9, the Permittee shall:

- (1) Ensure the following requirements are met, before allowing a gasoline transport subject to this rule to be filled or emptied:
  - (A) The gasoline transport is tested annually according to test procedures consistent with Appendix A of "Control of Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems", EPA-450/2-78-051, or equivalent procedure approved by the commissioner.
  - (B) The gasoline transport sustains a pressure change of no more than seven hundred fifty (750) pascals in five (5) minutes when pressurized to a gauge pressure of four thousand five hundred (4,500) pascals or evacuated to a gauge pressure of one thousand five hundred (1,500) pascals during the testing required in (1)(A).
  - (C) The gasoline transport is repaired by the owner or operator of the transport and retested within fifteen (15) days of testing if it does not meet the criteria of (1)(B).
  - (D) The gasoline transport displays a sticker which shows the date that the gasoline tank truck last passed the test required in (1)(A) through (1)(B). Such sticker shall be displayed near the Department of Transportation Certification Plate required by 49 CFR 178.340-10b.
- (2) The owner of the transport shall be responsible for compliance with subsection (1). The Permittee shall take all reasonable steps to ensure that transports loading at its facility comply with subsection (2), and shall, in all cases when its employees are present to supervise or perform loading, be responsible for compliance with (1)(D).
- (3) The Permittee, which owns and operates a vapor control system subject to this rule shall:
  - (A) Design and operate the applicable system and the gasoline loading equipment in a manner that prevents:
    - (i) gauge pressure from exceeding four thousand five hundred (4,500) pascals in the gasoline tank truck;

- (ii) a reading equal to or greater than one hundred percent (100%) of the lower explosive limit (LEL, measured as propane) at two and five-tenths (2.5) centimeters from all points on the perimeter of a potential leak source when measured by the method referenced in Appendix B of "Control of Organic Compound leaks from Gasoline Tank Trucks and Vapor Collection Systems", EPA 450/2-78-051, or an equivalent procedure approved by IDEM during loading or unloading operations; and
  - (iii) avoidable visible liquid leaks during loading or unloading operations.
- (B) Repair and retest a vapor collection or control system that exceeds the limits in (3)(A) within fifteen (15) days.
- (4) The OAQ staff may, at any time monitor a gasoline tank truck, vapor balance referenced, to confirm continuing compliance with subsection (1) or (2).
  - (5) If IDEM allows alternative test procedures in subsection (1)(A) or (3)(A)(ii), such method shall be submitted to the U.S. EPA as a SIP revision.

Reason not incorporated: Pursuant to 326 IAC 8-4-1(d), 326 IAC 8-4-2 through 8-4-5 and 326 IAC 8-4-7 through 8-4-9 applies to all new sources as of January 1, 1980. Since this source was constructed prior to January 1, 1980 in Huntington County, the requirements of 326 IAC 8-4-9 are not applicable.

(d) FESOP 069-7564-00004, issued on June 12, 1998, Condition D.2.9:

- (1) Daily checks for liquid leaks during loading or unloading operations of the truck loading rack, the vapor collection system and the vapor combustion unit shall be performed during normal daylight operations when the facility is in operation. A trained employee will record any visible liquid leaks and the date of such leaks.
- (2) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup and shut down time.
- (3) In the case of batch or discontinuous operations, checks shall be taken during the part of the operation that would normally be expected to cause the greatest potential for liquid leaks.
- (4) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance characteristics of liquid leaks for that specific process.
- (5) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a liquid is leaked.
- (6) All checks for visible liquid leaks made to comply with this condition shall be conducted in accordance with 326 IAC 8-4-9.

Reason not incorporated: Since the requirements of 326 IAC 8-4-9 (Petroleum Sources; Leaks from Transports and Vapor Collection Systems; Records) are not applicable it is no longer necessary to monitor equipment leaks in accordance with 326 IAC 8-4-9.

- (e) FESOP 069-7564-00004, issued on June 12, 1998, Condition D.2.10(c):

To document compliance with Condition D.2.4, the Permittee shall maintain records in accordance with all certification and testing repairs. The records must identify the following:

- (1) The gasoline tank truck, vapor collection system, or vapor control system.
- (2) The date of the test or repair.
- (3) If applicable, the type of repair and the date of the retest.

The records must be maintained in a legible, readily available condition for at least two (2) years after the date the testing or repair was completed.

Reason not incorporated: Since the requirements of 326 IAC 8-4-9 (Petroleum Sources; Leaks from Transports and Vapor Collection Systems; Records) are not applicable it is no longer necessary to require record keeping to document compliance with 326 IAC 8-4-9.

#### **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 June 7, 2002. Additional information was received on November 11, 2003.

#### **Emission Calculations**

See Pages 1 through 4 of 4 in Appendix A of this document for detailed emissions calculations.

#### **Unrestricted Potential Emissions**

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

<b>Pollutant</b>	<b>Unrestricted Potential Emissions (tons/year)</b>
PM	10.0
PM <sub>10</sub>	10.0
SO <sub>2</sub>	-
VOC	7,147
CO	0.049

Pollutant	Unrestricted Potential Emissions (tons/year)
NO <sub>x</sub>	0.291

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

HAPs	Unrestricted Potential Emissions (tons/year)
2,2,4 Trimethylpentane	21.3
Benzene	14.3
Cumene	0.142
Ethyl benzene	1.43
n-Hexane	14.2
MTBE	243
Toluene	21.7
Xylene	5.83
TOTAL	322

- (a) The unrestricted potential emissions of VOC are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Note that this source is not one of the 28 listed major PSD source categories because the storage capacity of the entire source is less than 300,000 barrels (12,600,000 gallons).

**Potential to Emit After Issuance**

The source, issued a FESOP on June 12, 1998, 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 the Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Source-wide Storage Tanks (significant and insignificant)	-	-	-	31.6	-	-	Single 0.527 Total 0.994
Loading Rack (LR1) when using Gasoline and/or Ethanol	-	-	-	61.9	-	-	Single 2.10 Total 2.78
Loading Rack (LR1) When using Remaining Capacity as Distillates (Petroleum Products With Vapor Pressure < 1.50 psia)	-	-	-	0.386	-	-	Single 0.023 Total 0.035
Combustion from VCU and Insignificant Space heater	0.009	0.009	-	0.005	0.049	0.291	Negligible
Pumps, Valves, Flanges, and Other	-	-	-	0.489	-	-	Negligible
Paved and Unpaved Roads	10.0	10.0	-	-	-	-	Negligible
Total PTE After Issuance	10.0	10.0	-	94.4	0.049	0.291	Single less than 10 Total less than 25

Potential emissions after issuance at this source are based on a total limited throughput of 250,000,000 gallons of throughput of gasoline and/or ethanol per twelve (12) consecutive month period and a VOC emission factor limit of 0.495 pounds per thousand (1000) gallons through loading rack (LR1), after control by the vapor combustion unit (VCU) and the vapor collection system (LRFUG).

Note that the limited potential to emit in the above table is based on a total loading rack throughput of 919,880,000 gallons of liquid products per year. The preceding throughput limit has been included as part of that total throughput.

### County Attainment Status

The source is located in Huntington County.

Pollutant	Status
PM <sub>10</sub>	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Huntington County has been designated as attainment or unclassifiable for ozone.
- (b) Huntington County has been classified as attainment, maintenance attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Federal Rule Applicability

- (a) Tank Nos. 1 through 5, 7 through 12, as well as 14 and 15 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60, Subpart K), because Tank Nos. 1 through 5, 7 through 12, as well as 14 and 15 were all constructed before June 11, 1973, or after May 19, 1978 and/or have a capacity less than 65,000 gallons (246 cubic meters).
- (b) Tank No. 6 is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110, Subpart K) because it was constructed after June 11, 1973 and prior to May 19, 1978 and has a capacity greater than 65,000 gallons. Since Tank No. 6 can store liquid with a true vapor pressure of greater than 1.5 pounds per square inch (psia) and less than 11.1 psia, the tank will be equipped with a floating roof, a vapor recovery system or the equivalents at all times. The Permittee is required to maintain a record of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective period.
- (c) Tank Nos. 1 through 5, and 8 through 11 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60, Subpart Ka), because Tanks No. 1 through 6, and 8 through 11, were all constructed before May 18, 1978, or after June 23, 1984.
- (d) Tank Nos. 7, 12, 14, and 15, construct after May 18, 1978, but before June 23, 1984, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60, Subpart Ka) because Tank Nos. 7, 12, 14, and 15 have storage capacities that are less than 151,416 liters (40,000 gallons), each.

- (e) On October 15, 2003, revisions to 40 CFR 60, Subpart Kb, became effective. As of the date this permit is being issued these revisions have not been incorporated into the Indiana state rules. Therefore, the requirements from the previous version of 40 CFR 60, Subpart Kb, published in the federal register on August 8, 1987, which is referenced by 326 IAC 12, will remain applicable until the revisions are incorporated into the Indiana State Implementation Plan (SIP) and the condition is modified in a subsequent permit action.
- (1) Tank Nos. 1 through 7, 12, 14, and 15 were all constructed before July 23, 1984. Therefore, Tank Nos. 1 through 7, 12, 14, and 15 will still not be subject to the New Source Performance Standard, 326 IAC 12 (40 CFR Part 60, Subpart Kb) after the rule revision.
- (2) Tank Nos. 8 through 11 will still not be subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60, Subpart Kb) after the rule revision because the tanks, constructed after July 23, 1984, have storage capacities less than 10,567 gallons (40 cubic meters), each.
- (f) The one (1) loading rack, identified as LR1, is subject to the New Source Performance Standards (326 IAC 12) (40 CFR 60.500 through 60.506, Subpart XX, Standards of Performance for Bulk Gasoline Terminals) because the one (1) loading rack, identified as LR1, was modified in 1983 which is after the rule applicability date of December 17, 1980. The operation of the VCU satisfies the emission requirements of this subpart, specifically that the VOC emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks will not exceed thirty-five (35) milligrams of total organic compounds per liter of gasoline loaded.

The total VOC emissions from the submerged gasoline loading rack with dedicated normal balance service are shown on page 2 of 4 of Appendix A based on a submerged loading rack emission factor of 15.47 pounds of VOC per kilogallon of gasoline loaded with a 98.12% vapor control system control efficiency. Note that the 98.12% control efficiency (the minimum control efficiency needed to comply with this subpart) was multiplied by the 98.65% capture efficiency to obtain the overall reduction efficiency (eff) term used to calculate the throughput limit.

$15.47 \text{ pounds} = 15.47 \times 453.59 \text{ grams per pound} \times 1,000 \text{ milligrams per gram} = 7,017,037.3 \text{ milligrams}$

$1 \text{ kilogallon} = 1,000 \text{ gallons} \times 3.7853 \text{ liters per gallon} = 3,785.3 \text{ liters}$

Therefore, 15.47 pounds per kilogallon is equivalent to 7,017,037.3 milligrams per 3,785.3 liters or 1,853.76 milligrams per liter. With a 98.12% control efficiency, the controlled VOC emission rate from the submerged gasoline loading rack will be 1,853.76 milligrams per liter  $\times (1 - 0.9815) = 34.9 \text{ milligrams per liter}$ . This emission rate complies with the NSPS Subpart XX standard of less than thirty-five (35) milligrams per liter.

- (g) The equipment at this source does not contain or contact a fluid that is at least ten percent (10%) benzene by weight. Therefore, pursuant to 40 CFR 61.111, this source is not in benzene service and is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR Part 61, Subpart J.
- (h) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR Part 61, Subpart V, because this source is not considered to be in volatile hazardous air pollutant (VHAP) service, as defined by 40 CFR 61.241.

- (i) This source is not subject to Gasoline Distribution NESHAP 40 CFR Part 63, Subpart R, Gasoline Distribution because this source will operate as a FESOP source pursuant 326 IAC 2-8-4, which limits the potential to emit of the entire source to less than ten (10) tons per year of any single HAP and twenty-five (25) tons per year of any combination of HAPs.

#### **State Rule Applicability - Entire Source**

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

- (a) Tank Nos. 1 through 6 and the one (1) loading rack, identified as LR1, were all constructed prior to August 7, 1977 and have a potential greater than a total of 250 tons of VOC per year. In addition, this source is not one of the 28 listed major PSD sources. Therefore, a PSD permit pursuant 326 IAC 2-2, was not required for this major source.
- (b) The potential to emit VOC from Tank Nos. 7, 12, and 14, constructed in 1981, was less than forty (40) tons per year total. Therefore, the construction of those emission units was considered a minor modification to an existing major PSD source.
- (c) The increase in potential to emit VOC from the entire source as a result of the construction of Tank No. 15 and the modification to the one (1) loading rack, identified as LR1, in 1983, was less than forty (40) tons per year total. Therefore, the construction and modification was considered a minor modification to an existing major PSD source.
- (d) The source was issued CP 35-05-90-01, on January 30, 1987, limiting the entire source to less than two hundred fifty (250) tons of VOC per year, making the source a minor PSD source.
- (e) This source is still a minor PSD source because pursuant to 326 IAC 2-8-4 (FESOP), the potential to emit VOC shall be limited to less than one hundred (100) tons per year for the entire source.

Note that this source is not operating as one of the 28 listed major PSD source categories because the storage capacity of the entire source is less than 300,000 barrels (12,600,000 gallons).

##### 326 IAC 2-6 (Emission Reporting)

This source is located in Huntington County and the potential to emit VOC is less than limited to less than one hundred (100) tons per year. Therefore 326 IAC 2-6 does not apply.

##### 326 IAC 2-4.1-1 (New source toxics control)

The entire source except for Tank Nos. 6, 10 and 11 were constructed before July 27, 1997. The potential to emit any single HAP from Tank Nos. 6, 10 and 11 are less than ten (10) tons per year each and the potential to emit any combination of HAPs from Tank Nos. 10 and 11 are less than twenty-five (25) tons per year each. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply.

##### 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. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply. The following limitation shall apply to the one (1) loading rack, identified as LR1:

The total throughput of gasoline and/or ethanol to the loading rack, identified as LR1, will be limited to 250,000,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month at an emission rate of 0.495 pounds per thousand (1000) gallons, equivalent to 61.9 tons of VOC per year. This throughput limit in combination with 0.386 tons per year potential from loading rack using the remaining throughput available as distillate distillates (any petroleum product with a vapor pressure less than 1.5 psia), the 31.6 tons per year potential VOC emissions from the storage tanks and the 0.489 tons per year potential VOC emissions from fugitive emissions, limits the potential to emit VOC from entire source to less than one hundred (100) tons per year. This throughput also limits the potential to emit of each individual HAP to 2.10 tons per year, total HAPs to 2.78 tons per year from the one (1) loading rack, identified as LR1 and less than ten (10) tons per year for each individual HAP and twenty-five (25) tons per year of the combination of HAPs from the entire source. The vapor combustion unit (VCU) and the vapor collection system shall be in operation at all times in order to comply with this limitation.

#### 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 forty percent (40%) 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 8-1-6 (New facilities, general reduction requirements)

- (a) Since the modification done to the loading rack, identified as LR1, after January 1, 1980 was not defined as a reconstruction, the requirements of 326 IAC 8-1-6 do not apply to the loading rack.
- (b) The potential to emit VOC from Tank Nos. 8 through 12, 14 and 15, constructed after January 1, 1980, is less than twenty-five (25) tons per year each. Therefore, the requirements of 326 IAC 8-1-6 do not apply to these storage tanks.

##### 326 IAC 8-4 (Petroleum Sources)

Pursuant to 326 IAC 8-4-1(d), 326 IAC 8-4-2 through 8-4-5 and 326 IAC 8-4-7 through 8-4-9 applies to all new sources as of January 1, 1980. Since this source was constructed prior to January 1, 1980 in Huntington County, the requirements of 326 IAC 8-4-4, 8-4-7, and 8-4-9 are not applicable.

##### 326 IAC 8-6 (Organic Solvent Emission Limitations)

This source commenced operation prior to October 7, 1974 in Huntington County. Therefore, the requirements of 326 IAC 8-6 are not applicable.

##### 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This source located in Huntington is not subject to 326 IAC 8-9 because the source is not located in Clark, Floyd, Lake or Porter County.

#### 326 IAC 14-7 (Emission Standards for Equipment Leaks (Fugitive Emission Sources) of Benzene)

The source is not subject to 326 IAC 14-7 because the amount of benzene emitted is less than ten percent (10%) of the total HAPs and therefore, not classified as a benzene service defined in 40 CFR 60, Subpart J.

#### 326 IAC 14-8 (Emission Standard for Equipment Leaks (Fugitive Emission Sources))

The source is not subject to 326 IAC 14-8 because the amount of VHAP in petroleum products are less than ten percent (10%) of the total molecular weight of a liquid or a gas that passes through a flare, valve, or range and therefore, is not classified as a VHAP service defined in 40 CFR 60, Subpart V.

### Testing Requirements

A stack test conducted at the one (1) loading rack, identified as LR1, on September 26, 2002, measured VOC emissions of 8.63 milligrams per liter of gasoline loaded over a six (6) hour period. The 8.63 milligrams per liter of gasoline loaded is below the 35 milligram per liter limit that is necessary to comply with 40 CFR 60 Subpart XX.

To demonstrate compliance with 326 IAC 2-8-4 and 40 CFR 60 Subpart XX, a compliance stack test shall be performed by September 26, 2007 which corresponds to five (5) years since the latest valid stack test at the loading. This test shall be performed on the vapor combustion system (VCU) with the vapor collection systems according to 40 CFR 60, Appendix A, Methods 25 and 25A.

### 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, OAQ, 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 Section D of the permit 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 Section D of the permit. 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 this source are as follows:

The vapor combustion unit (VCU) has applicable compliance monitoring conditions as specified below:

- (a) The Permittee shall perform daily checks of the pilot flame presence at the vapor combustion unit (VCU).
- (b) Quarterly reports shall be submitted to OAQ. These reports shall include the petroleum products and ethanol throughput to the truck loading rack.

These monitoring conditions are necessary because the vapor combustion unit (VCU) must operate properly to ensure compliance with 326 IAC 2-8 (FESOP).

All compliance requirements from previous approvals were incorporated into this FESOP except the following:

- (a) Daily checks for liquid leaks during loading or unloading operations of the truck loading rack, the vapor collection system and the vapor combustion unit shall be performed during normal daylight operations when the facility is in operation. A trained employee will record any visible liquid leaks and the date of such leaks.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup and shut down time.
- (c) In the case of batch or discontinuous operations, checks shall be taken during the part of the operation that would normally be expected to cause the greatest potential for liquid leaks.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance characteristics of liquid leaks for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a liquid is leaked.

All checks for visible liquid leaks made to comply with this condition shall be conducted in accordance with 326 IAC 8-4-9.

Reason not incorporated: Since the requirements of 326 IAC 8-4-9 (Petroleum Sources; Leaks from Transports and Vapor Collection Systems; Records) are not applicable it is no longer necessary to monitor equipment leaks in accordance with 326 IAC 8-4-9 because the source was constructed prior to January 1, 1980 in Huntington County.

## **Conclusion**

The operation of this bulk gasoline terminal shall be subject to the conditions of the attached proposed FESOP Renewal No.: F 069-15724-00004.

**Appendix A: Emissions Calculations  
VOC and HAP Emissions  
From Storage Tanks**

**Company Name: Citgo Petroleum Corporation  
Address City IN Zip: 4393 North Meridian Road, Huntington, Indiana 46750  
FESOP: F 069-15724  
Plt ID: 069-00004  
Reviewer: Michael S. Schaffer  
Application Date: June 7, 2002**

**Tank Capacity**

Tank #	capacity (gallons)	capacity (barrels)
1	3150000	75002
2	1057669	25183
3	1488424	35439
4	1050000	25001
5	42142	1003
6	2310000	55001
7	29614	705
8	1000	23.8
9	1000	23.8
10	2000	47.6
11	1000	23.8
12	12523	298
14	1000	23.8
15	10000	238
<b>Total:</b>	<b>9156372</b>	<b>218013</b>

**VOC Emissions**

Tank #	Potential to Emit VOC (lbs/year)	Potential to Emit VOC (tons/year)
1	7620	3.81
2	4560	2.28
3	6660	3.330
4	7460	3.73
5	11520	5.76
6	11340	5.67
7	10620	5.310
8	6.360	0.0032
9	6.360	0.0032
10	20.00	0.010
11	280	0.140
12	2700	1.35
14	320	0.16
15	2.72	0.001
<b>Total:</b>	<b>63115</b>	<b>31.6</b>

Capacity (barrels) = Capacity (gallons) \* (0.02381 barrels/gallon)

Note: Worst case product stored in Tank Nos. 1, 2, 4, and 6, is Gasoline RVP 15, Tank No. 3 No. 2 Distillate Fuel Oil, Tank Nos. 5 and 7 is Denatured Ethanol, Tank Nos. 8, 9, 10, and 15 is fuel additive, Tank Nos. 11 and 14 is Transmix, Tank No.12 is Petroleum Contact Water

**State Potential Emissions**

METHODOLOGY FOR TANKS: Tanks 4.0

METHODOLOGY FOR LOADING RACK: See page 2

**Gasoline HAP Emissions**

HAP	Worst Case Weight % in gasoline vapor	Potential to Emit VOC from Gasoline (tanks only) (lbs/yr)	HAP Emissions from Gasoline (lbs/yr)	Worst Case HAP Emissions (tanks only) (tons/yr)
2,2,4- Trimethylpent.	0.300%	30980	92.9	0.046
Benzene	0.200%	30980	62.0	0.031
Cumene	0.002%	30980	0.620	0.0003
Ethyl benzene	0.020%	30980	6.20	0.003
n-Hexane	0.200%	30980	62.0	0.031
MTBE	3.400%	30980	1053	0.527
Toluene	0.300%	30980	92.9	0.046
Xylene	0.070%	30980	21.7	0.011
<b>Subtotal HAPs:</b>				<b>0.696</b>

**No. 2 Distillate Fuel Oil HAP Emissions**

HAP	Worst Case Weight % in No. 2 Distillate vapor	Potential to Emit VOC from No. 2 Distillate (tanks only) (lbs/yr)	HAP Emissions from No. 2 Distillate (lbs/yr)	Worst Case HAP Emissions (tanks only) (tons/yr)
Benzene	0.200%	6660	13.3	0.007
Ethyl benzene	0.300%	6660	20.0	0.010
n-Hexane	0.060%	6660	4.00	0.002
Toluene	2.40%	6660	160	0.080
Xylene	6.00%	6660	400	0.200
<b>Subtotal HAPs:</b>				<b>0.298</b>
<b>Total HAPs from Tanks (tons/yr):</b>				<b>0.994</b>

**Methodology**

HAP % \* VOC Emissions (lbs/yr) = HAPs Emissions (lbs/yr) / (2000lbs/ton) = HAPs Emission (tons/yr)

Note that Ethanol, Fuel Additives and Transmix do not contain any HAPs

**Appendix A: Emissions Calculations  
VOC and HAP Emissions  
From Loading Racks**

**Company Name: Citgo Petroleum Corporation  
Address City IN Zip: 4393 North Meridian Road, Huntington, Indiana 46750  
FESOP: F 069-15724  
PII ID: 069-00004  
Reviewer: Michael S. Schaffer  
Application Date: June 7, 2002**

**Loading Bay No. 1 and 2 Total "Worst Case" VOC Emissions**

Fugitive Source	Gasoline Emission Factor (lbs/1000gal)	Annual Throughput (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)	Uncontrolled VOC Emissions (tons/yr)	Overall Reduction Efficiency	Controlled VOC Emissions (tons/yr)
Loading Rack	15.47	919800000	14229306	7115	7115	96.80%	227.7

Note that "Worst Case" VOC emissions are based on the Maximum Pipeline Throughput using gasoline RVP 15

**Loading Bay No. 1 and 2 "Worst Case" Limited VOC Emissions**

Fugitive Source	Gasoline Emission Factor (lbs/1000gal)	Limited Annual Throughput (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)	Limited Uncontrolled VOC Emissions (tons/yr)	Overall Reduction Efficiency	Limited Controlled VOC Emissions (tons/yr)
Loading Rack	15.47	250000000	3867500	1934	1934	96.80%	61.9

Fugitive Source	No. 2 Distillate Fuel Oil Emission Factor (lbs/1000gal)	Annual Throughput (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)	Uncontrolled VOC Emissions (tons/yr)	Overall Reduction Efficiency	Controlled VOC Emissions (tons/yr)
Loading Rack	0.036	669800000	24113	12.06	12.06	96.80%	0.386

**Methodology**

Emission Factor is based on the equation  $L = 12.46 \text{ SPM} / T$  from (AP-42 page 5.2-4)  
 $L$  = Loading Loss,  $S$  = a saturation factor which is based on a dedicated normal service of gasoline and No. 2 Distillate Fuel Oil loading with a submerged fillpipe,  $P$  = True Vapor Pressure,  $T$  = Temperature of Bulk liquid loaded  
 "Worst Case" product is gasoline and No. 2 Distillate Fuel Oil representing distillates based on Gasoline RVP 15 and No. 2 Distillate Fuel Oil @ 80 degrees F (AP-42 table 7.1-2)  
 Overall Reduction Efficiency =  $\text{eff} = \text{capture efficiency percentage} \times \text{vapor collection system control efficiency} = 98.65\% \times 98.12\%$  (control efficiency needed to comply with 40 CFR 60 Subpart XX)  
 (Emission Factor (lbs/1000gal) \* Total Limited Annual or Annual Throughput (gallons)) / 1000 gallons = Emissions (lbs/yr) / 2000 (lbs/ton) = Emissions (tons/yr)  
 Total Maximum Annual Throughput (gallons/yr) = 919,800,000 gallons per year which is the maximum amount of liquid that can be delivered to the source.  
 Note that emissions from gasoline also includes ethanol and any petroled product with a true vapor pressure of 1.50 psia or greater .  
 Since gasoline, ethanol, and any petroleum product with a true vapor pressure of 1.50 psia or greater are limited, the source can still load the remaining throughput with No. 2 Distillate Fuel Oil or any other distillate (petroleum product with a true vapor pressure of less than 1.50 psia).

**Potential HAP Emissions After Limitations**

HAP	Worst Case Weight % in Gasoline Vapor	Amount of "Worst Case" VOC Emissions From Gasoline (lbs/yr)	Amount of "Worst Case" HAPs Emissions From Gasoline (lbs/yr)	Amount of "Worst Case" HAPs Emissions From Gasoline Before Controls (tons/yr)	VOC Emissions From Gasoline After Gasoline Limitation (lbs/yr)	HAPs Emissions From Gasoline After Gasoline Limitation (lbs/yr)	HAPs Emissions From Gasoline After Gasoline Limitation Before Controls (tons/yr)	Overall Control Efficiency	HAPs Emissions From Gasoline After Gasoline Limitation After Controls (tons/yr)
2,2,4- Trimethylpent.	0.300%	14229306	42688	21.3	3867500	11603	5.80	96.80%	0.186
Benzene	0.200%	14229306	28459	14.2	3867500	7735	3.87	96.80%	0.124
Cumene	0.002%	14229306	284.6	0.142	3867500	77.4	0.039	96.80%	0.001
Ethyl benzene	0.020%	14229306	2846	1.42	3867500	774	0.387	96.80%	0.012
n-Hexane	0.200%	14229306	28459	14.2	3867500	7735	3.87	96.80%	0.124
MTBE	3.400%	14229306	483796	242	3867500	131495	65.7	96.80%	2.10
Toluene	0.300%	14229306	42688	21.3	3867500	11603	5.80	96.80%	0.186
Xylene	0.070%	14229306	9961	4.98	3867500	2707	1.35	96.80%	0.043
<b>Total HAPs:</b>			<b>639180</b>	<b>320</b>		<b>173728</b>	<b>86.9</b>		<b>2.78</b>

HAP	Worst Case Weight % in No. 2 Distillate Fuel Oil vapor	VOC Emissions From No. 2 Distillate Fuel Oil After Gasoline Limitation (lbs/yr)	HAPs Emissions From No. 2 Distillate Fuel Oil After Gasoline Limitation (lbs/yr)	HAPs Emissions From No. 2 Distillate Fuel Oil After Gasoline Limitation Before Controls (tons/yr)	Overall Control Efficiency	HAPs Emissions From No. 2 Distillate Fuel Oil After Gasoline Limitation After Controls (tons/yr)
Benzene	0.200%	24113	48.2	0.024	96.80%	0.001
Ethyl benzene	0.300%	24113	72.3	0.036	96.80%	0.001
n-Hexane	0.060%	24113	14.5	0.007	96.80%	0.0002
Toluene	2.40%	24113	579	0.289	96.80%	0.009
Xylene	6.00%	24113	1447	0.723	96.80%	0.023
<b>Total HAPs:</b>			<b>2161</b>	<b>1.08</b>		<b>0.035</b>

**Flanges, Pumps, Valves, and Others Potential to Emit**

Fugitive Source	Emission Factor (lbs/hr)	Number Leaking	Fugitive Emissions (lbs/hr)	Fugitive Emissions (tons/yr)
Valves	0.0001	375	0.036	0.156
Flanges	0.00002	522.0	0.009	0.040
Pump Seals	0.001	13.0	0.015	0.068
Other	0.0003	179.0	0.051	0.225
<b>Total VOC:</b>			<b>0.112</b>	<b>0.489</b>

**Appendix A: Emission Calculations  
Emissions From Combustion**

**Company Name:** Citgo Petroleum Corporation  
**Address City IN Zip:** 4393 North Meridian Road, Huntington, Indiana 46750  
**FESOP:** F 069-15724  
**Plt ID:** 069-00004  
**Reviewer:** Michael S. Schaffer  
**Application Date:** June 7, 2002

**Total Propane-Fired Combustion Emissions**      Heat Input Capacity: 0.317 mmbtu/hr  
*One Space Heaters rated at 0.100 mmbtu/hr*      Liquid Propane Heat Content: 90500 Btu/gal  
*One (1) VCU burner rated at 0.217 mmbtu/hr*

Pollutant	Emission Factors (lbs/kgal)	Emission Factors (lbs/mmbtu)	Emissions (lbs/yr)	Potential Emissions (tons/yr)
PM*	0.60	0.01	0.002	<b>0.009</b>
PM-10*	0.60	0.01	0.002	<b>0.009</b>
NOx	19.00	0.21	0.067	<b>0.291</b>
VOC*	0.50	0.01	0.002	<b>0.008</b>
CO	3.20	0.04	0.011	<b>0.049</b>

\*PM (lbkgal) emission factor is filterable PM only. PM10 lb/kgal emission factor is assumed to be the same as PM based on a footnote in Table 1.5-1, therefore PM10 is filterable only as well.

\*\*The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

**Methodology**

Emission Factor (lbs/MMBtu) = (Emission Factor (lbs/kgal) \* 1,000,000 Btu/MMBtu) / ( Liquid Propane Heat Content (90,5000 Btu/gal) \* 1000gal/kgal)

Emissions (lbs/hr) = Heat Input Capacity (mmbtu/hr) \* Emission Factor (lbs/mmbtu)

Emissions (tons/yr) = Emissions (lbs/hr) \* 8760hrs/yr\*1 ton/2000 lbs

**Appendix A: Emission Calculations  
Limited and Control Emissions Summary**

**Company Name:** Citgo Petroleum Corporation  
**Address City IN Zip:** 4393 North Meridian Road, Huntington, Indiana 46750  
**FESOP:** F 069-15724  
**Plt ID:** 069-00004  
**Reviewer:** Michael S. Schaffer  
**Application Date:** June 7, 2002

**VOC Emissions including Limits and Controls**

Tank #	Potential to Emit VOC (lbs/year)	Potential to Emit VOC (tons/year)	VOC Control Efficiency	Potential to Emit VOC after control (lbs/year)	Potential to Emit VOC after control (tons/year)
1	7620	3.810	0.00%	7620	3.81
2	4560	2.280	0.00%	4560	2.28
3	6660	3.33	0.00%	6660	3.33
4	7460	3.73	0.00%	7460	3.73
5	11520	5.76	0.00%	11520	5.76
6	11340	5.67	0.00%	11340	5.67
7	10620	5.310	0.00%	10620	5.31
8	6.36	0.003	0.00%	6.36	0.003
9	6.36	0.003	0.00%	6.36	0.003
10	20.0	0.010	0.00%	20.0	0.010
11	280	0.140	0.00%	280	0.140
12	2700	1.350	0.00%	2700	1.35
14	320	0.160	0.00%	320	0.160
15	2.72	0.001	0.00%	2.72	0.001
<b>Loading Racks (gasoline or Denatured Ethanol)</b>	<b>3867500</b>	<b>1934</b>	<b>96.80%</b>	<b>123760</b>	<b>61.9</b>
<b>Loading Racks (No. 2 Distillate Fuel Oil or other Distillates)</b>	<b>24133</b>	<b>12.07</b>	<b>96.80%</b>	<b>772</b>	<b>0.386</b>
<b>Pumps</b>	136.0	0.068	0.00%	136.0	0.068
<b>Flanges</b>	80.0	0.040	0.00%	80	0.040
<b>Valves</b>	312.0	0.156	0.00%	312.0	0.156
<b>Other</b>	450	0.225	0.00%	450.00	0.225
<b>Combustion</b>	0.002	0.000001	0.00%	0.002	0.000001
<b>Total:</b>	<b>3955726</b>	<b>1978</b>		<b>188626</b>	<b>94.3</b>

**Gasoline HAP Emissions**

HAP	Tank HAP Emissions from Gasoline (lbs/yr)	Worst Case HAP Emissions (tanks only) (tons/yr)	Loading Rack HAP Emissions from Gasoline (lbs/yr)	Loading Rack HAP Emissions (tons/yr) Before Control	Loading Rack HAP Emissions (tons/yr) After Control	Entire Source gasoline HAP Emissions (tons/yr) After Control
2,2,4- Trimethylpent.	92.9	0.046	11603	5.8	0.186	0.232
Benzene	62.0	0.031	7735	3.87	0.124	0.155
Cumene	0.620	0.0003	77.4	0.04	0.001	0.002
Ethyl benzene	6.20	0.003	774	0.39	0.012	0.015
n-Hexane	62.0	0.031	7735	3.87	0.124	0.155
MTBE	1053	0.527	131495	65.75	2.104	2.63
Toluene	92.9	0.046	11603	5.80	0.186	0.232
Xylene	21.7	0.011	2707	1.35	0.043	0.054
<b>Total HAPs:</b>		<b>0.696</b>	<b>173729</b>	<b>86.9</b>	<b>2.78</b>	<b>3.48</b>

**No. 2 Distillate Fuel Oil HAP Emissions**

HAP	Tank HAP Emissions from No. 2 Distillate Fuel Oil (lbs/yr)	Worst Case HAP Emissions (tanks only) (tons/yr)	Loading Rack HAP Emissions from No. 2 Distillate Fuel Oil (lbs/yr)	Loading Rack HAP Emissions (tons/yr) Before Control	Loading Rack HAP Emissions (tons/yr) After Control	Entire Source No. 2 Distillate Fuel Oil HAP Emissions (tons/yr) After Control
Benzene	13.3	0.007	48.2	0.024	0.001	0.007
Ethyl benzene	20.0	0.010	72.3	0.036	0.001	0.011
n-Hexane	4.00	0.002	14.5	0.0073	0.0002	0.002
Toluene	160	0.080	579	0.290	0.009	0.089
Xylene	400	0.200	1447	0.724	0.023	0.223
<b>Total HAPs:</b>		<b>0.298</b>	<b>2161</b>	<b>1.08</b>	<b>0.035</b>	<b>0.333</b>