

December 2, 2003

Mr. Wade Gray  
VP Racing Fuels Inc.  
P. O. Box 47878  
San Antonio, TX 78265-7878

Re: Registered Construction and Operation Status,  
167-17945-00134

Dear Mr. Gray.:

The application from VP Racing Fuels Inc., received on July 16, 2003, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following chemical blending operation, to be located at 4100 Steelton Avenue, Terre Haute, Indiana, is classified as registered:

1. Above ground storage tank, identified as AST-1, storing unleaded fuel, with a capacity of 19,800 gallons (74.95 cubic meters).
2. Above ground storage tank, identified as AST-2, storing leaded fuel, with a capacity of 19,800 gallons (74.95 cubic meters).
3. Above ground storage tank, identified as AST-3, storing leaded fuel, with a capacity of 19,800 gallons (74.95 cubic meters).
4. Above ground storage tank, identified as AST-4, storing aviation gas, with a capacity of 19,800 gallons (74.95 cubic meters).
5. Above ground storage tank, identified as AST-5, storing methanol, with a capacity of 21,000 gallons (79.49 cubic meters).
6. Above ground storage tank, identified as AST-6, storing blended fuel, with a capacity of 19,800 gallons (74.95 cubic meters).

The following conditions shall be applicable:

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

- (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 15 minutes (60 readings) in a 6-hour period 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.

Pursuant to 326 IAC 12-1-1 (New Source Performance Standards) the source shall keep the following information on tanks AST-1, AST-2, AST-3, AST-4, AST-5, and AST-6 for the life of the source:

- (a) Readily accessible records showing the dimension of each storage vessel; and
- (b) An analysis showing the capacity of the each storage vessel.

This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to Vigo County Air Pollution Control and the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

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

and

**Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to Vigo County Air Pollution Control (VCAPC) and the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by George M. Needham  
George M. Needham  
Director  
Vigo County Air Pollution Control

**RKH**

cc: Mindy Hahn - IDEM, OAQ - Permit Branch  
Winter Bottum - IDEM, OAQ

## Registration

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

<b>Company Name:</b>	VP Racing Fuels Inc.
<b>Address:</b>	4100 Steelton Avenue
<b>City:</b>	Terre Haute, Indiana 47805
<b>Authorized individual:</b>	
<b>Phone #:</b>	
<b>Registration #:</b>	167-17945-00134

I hereby certify that VP Racing Fuels Inc. is still in operation and is in compliance with the requirements of Registration **167-17945-00134**.

<b>Name (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
Vigo County Air Pollution Control**

**Technical Support Document (TSD) for a Registration**

**Source Background and Description**

**Source Name:** VP Racing Fuels Inc.  
**Source Location:** 4100 Steelton Avenue, Terre Haute, Indiana 47805  
**County:** Vigo County  
**SIC Code:** 2999  
**Registration No.:** 167-17945-00134  
**Permit Reviewer:** Rob Harmon - VCAPC

Vigo County Air Pollution Control (VCAPC) has reviewed an application from VP Racing Fuels Inc. relating to the construction and operation of a new chemical blending operation.

**Permitted Emission Units and Pollution Control Equipment**

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

1. Above ground storage tank, identified as AST-1, storing unleaded fuel, with a capacity of 19,800 gallons (74.95 cubic meters).
2. Above ground storage tank, identified as AST-2, storing leaded fuel, with a capacity of 19,800 gallons (74.95 cubic meters).
3. Above ground storage tank, identified as AST-3, storing leaded fuel, with a capacity of 19,800 gallons (74.95 cubic meters).
4. Above ground storage tank, identified as AST-4, storing aviation gas, with a capacity of 19,800 gallons (74.95 cubic meters).
5. Above ground storage tank, identified as AST-5, storing methanol, with a capacity of 21,000 gallons (79.49 cubic meters).
6. Above ground storage tank, identified as AST-6, storing blended fuel, with a capacity of 19,800 gallons (74.95 cubic meters).

**Existing Approvals**

This application covered construction of a new source. Therefore, no previous approvals exist.

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Commissioner that the construction and operation 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 application for the purposes of this review was received on July 16, 2003, with additional information received on September 2, 2003 and November 3, 2003.

### Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document.

### Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	neg
PM-10	neg
SO <sub>2</sub>	neg
VOC	10.28
CO	neg
NO <sub>x</sub>	neg

HAP's	Potential To Emit (tons/year)
Methanol	less than 10
TOTAL	less than 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. Therefore, the source is not 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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Actual Emissions

No previous emission data has been received from the source (new source).

**County Attainment Status**

The source is located in Vigo County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	maintenance 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. Vigo County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Vigo County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Source Status**

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	neg
PM10	neg
SO <sub>2</sub>	neg
VOC	10.28
CO	neg
NO <sub>x</sub>	neg
Single HAP	2.57
Combination HAPs	10.28

This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

**Part 70 Permit Determination**

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

### **Federal Rule Applicability**

- (a) Tanks AST-1, AST-2, AST-3, AST-4, and AST-6 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb), due to the volume of the tanks. This Subpart was amended on October 15, 2003 and now states only tanks storing Volatile Organic Liquids with a capacity greater than or equal to 75 cubic meters are subject to the requirements. These five (5) tanks all have capacities below 75 cubic meters.

However, 326 IAC 12-1-1(New Source Performance Standards) incorporated by reference this Subpart as of December 20, 2001. That means the State rule no longer matches the current Federal rule. The version incorporated into the State rules under 326 IAC 12-1-1 required tanks with capacities above 40 cubic meters, but less than 75 cubic meters to comply with the provisions of 40 CFR 60.116b (a) and (b), but exempted them from the rest of the requirements. The requirement from (b) is: "The owner or operator of each storage vessel as specified in 110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel." Further (a) requires any records from (b) shall be kept for the life of the source.

- (b) Tank AST-5 is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb), due to the vapor pressure of the product stored. This Subpart was amended on October 15, 2003 and now states only tanks storing Volatile Organic Liquids with a capacity between 75 cubic meters and 151 cubic meters with a maximum true vapor pressure greater than or equal to 15.0 kPa are subject to the requirements. This tank stores Methanol which has a vapor pressure less than that threshold.

However, 326 IAC 12-1-1(New Source Performance Standards) incorporated by reference this Subpart as of December 20, 2001. That means the State rule no longer matches the current Federal rule. The version incorporated into the State rules under 326 IAC 12-1-1 required tanks with capacities above 75 cubic meters, but less than 151 cubic meters storing liquids with a true vapor pressure less than 15.0 kPa to comply with the provisions of 40 CFR 60.116b (a) and (b), but exempted them from the rest of the requirements. The requirement from (b) is: "The owner or operator of each storage vessel as specified in 110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel." Further (a) requires any records from (b) shall be kept for the life of the source.

- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

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

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

This source is located in Vigo County and the potential to emit all criteria pollutants is less than one hundred (100) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential to emit PM10 is less than one-hundred (100) tons per year including fugitive emissions,

therefore, 326 IAC 2-6 does not apply.

The source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of fee assessment.

#### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), 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 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.

This is the appropriate emission limit because this source is not located in the small area of Vigo County subject to the more stringent opacity limitation.

#### **State Rule Applicability - Individual Facilities**

##### 326 IAC 8-1-6

This source is not subject to the requirements of 326 IAC 8-1-6 because the potential to emit VOC is below 25 tons per year.

##### 326 IAC 8-4

None of the provisions under 326 IAC 8-4 apply to VP Racing Fuels. They are applying for a fuel blending plant. They are not a petroleum refinery. None of the tanks are 39,000 gallons or bigger. They are not a bulk gasoline terminal. They are not a bulk gasoline plant. They are not a gasoline dispensing facility. The transports themselves are not part of this stationary source. And finally, the leak provisions do not apply because the underlying provisions don't apply.

#### **Conclusion**

The construction and operation of this chemical blending operation shall be subject to the conditions of the attached proposed registration 167-17845-00134.