

September 7, 2004

Mr. William J. Day
Marathon Ashland Petroleum LLC
539 South Main Street
Findlay, OH 45840-3295

Certified Mail: 7000 0600 0023 5188 1720

Re: 097-19125-00159 First Significant Permit Modification to Part 70 Permit No. 097-16068-00159

Dear Mr. Day:

Marathon Ashland Petroleum LLC was issued a permit (T 097-16068-00159) on October 6, 2003 relating to the operation of a petroleum distribution terminal.

On May 11, 2004, an application from Marathon Ashland Petroleum LLC was received, requesting an amendment to the frequency of the inspections of the carbon absorber and carbon bed pressure records specified in Condition D.1.9 (a) of the Part 70 Operating Permit. The Permittee has requested that the frequency of compliance monitoring in Condition D.1.9 (a) be changed from once per day to once per scheduled work day.

On April 6, 2004, an application was received requesting that the emission statement condition be revised due to the revisions to 326 IAC 2-6 (Emission Reporting) which became effective on March 27, 2004. The Permittee is no longer required to submit an annual emission statement; therefore, the emission statement condition will be removed from the permit.

This application has been reviewed. Based on the data submitted by the source, it has been determined that the additions listed above represent a relaxation of a monitoring. Therefore, pursuant to the provisions of 326 IAC 2-7-12(d), a permit modification to the Part 70 Operating Permit number T 097-16068-00159 is being issued. The permit is hereby modified as follows. The bold language is new language that has been added, and the language with a line through it has been taken out. These are only being used in this letter to emphasize the changes made. The permit will be revised as follows:

1. The emission statement condition has been revised as follows:

C.16 Emission Statement [~~326 IAC 2-7-5(3)(C)(iii)~~] [~~326 IAC 2-7-5(7)~~] [~~326 IAC 2-7-19(c)~~]
[~~326 IAC 2-6~~]

(a) **Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three years thereafter**, the Permittee shall submit **by July 1** an annual emission statement **covering the previous calendar year**. ~~certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement~~ **The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and** shall meet the following requirements:

(1) Indicate estimated actual emissions of ~~criteria~~ **all** pollutants ~~from the source, in compliance with listed in~~ **326 IAC 2-6(a) (Emission Reporting)**;

- (2) Indicate estimated actual emissions of ~~other~~ regulated pollutants (as defined by 326 IAC 2-7-1)(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purposes of ~~Part 70~~ fee assessment.

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:~~

The statement must be submitted to:

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

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

2. Condition D.1.9 (a) is amended as follows:

D.1.9 Monitoring

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

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

Each scheduled workday, the ~~The~~ Permittee shall conduct an ~~daily~~ inspection of the carbon bed pressure records for any deviations in the carbon bed regeneration cycle time mentioned above since the last daily inspection. **The Permittee shall maintain an automated system which prevents the loading of gasoline and alerts the facility's operators when the carbon bed regeneration cycle time exceeds fifteen (15) minutes.** The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when the regeneration cycle is outside the above mentioned range for any one (1) reading. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Angelique Oliger, at (317) 327-2846.

Sincerely,

ORIGINAL SIGNED BY

John B. Chavez
Administrator

Attachments: FESOP Administrative Amendment AAF 097-19125-00159 (three pages)
Technical Support Document (two pages)

cc: OES Files - 2 copies
Compliance - Matt Mosier
USEPA - R5
Marion County Health Dept.
IDEM, Mindy Hahn

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

PART 70 OPERATING PERMIT RENEWAL

OFFICE OF AIR QUALITY AND CITY OF INDIANAPOLIS, OFFICE OF ENVIRONMENTAL SERVICES

**Marathon Ashland Petroleum LLC
4955 Robison Road
Indianapolis, Indiana 46268**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: T097-16068-00159	
Issued by: ORIGINAL SIGNED BY John B. Chavez, Administrator Office of Environmental Services	Issuance Date: October 6, 2003 Expiration Date: October 6, 2008

First Significant Permit Modification: SPM 097-19125-00159	Pages Affected: 25 and 31
Issued by: ORIGINAL SIGNED BY John B. Chavez, Administrator Office of Environmental Services	Issuance Date: September 7, 2004

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all listed in 326 IAC 2-6(a);
- (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1)(32)("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (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 or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

In order to comply with Conditions D.1.2, D.1.3, D.1.4, and D.1.5, the carbon adsorber or vapor combustor for VOC and HAP control shall be in operation at all times when loading operations are taking place.

D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) During the period between 30 and 36 months after issuance of this permit, in order to demonstrate compliance with single HAP emission limit of 0.66 pounds per hour and the combination HAP emission limit of 2.13 pounds per hour in Condition D.1.3, the Permittee shall perform HAP testing on the carbon adsorber utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) To demonstrate compliance with Condition D.1.5, the Permittee shall perform testing required in Condition D.1.5.
- (c) If the commissioner allows alternative test procedures in Condition D.1.5, such methods shall be submitted to the U.S. EPA as a SIP revision.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring

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

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

Each scheduled workday, the Permittee shall conduct an inspection of the carbon bed pressure records for any deviations in the carbon bed regeneration cycle time mentioned above since the last daily inspection. The Permittee shall maintain an automated system which prevents the loading of gasoline and alerts the facility's operators when the carbon bed regeneration cycle time exceeds fifteen (15) minutes. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when the regeneration cycle is outside the above mentioned range for any one (1) reading. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) When operating the vapor combustor (flare) to control VOC and HAP emissions, the Permittee shall install and maintain a monitor to detect the presence of a flame at the flare tip. The presence of a flame at the flare tip shall be monitored at all times when the vapors are being vented to the flare. The monitor shall be

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

**Technical Support Document (TSD) for a Part 70
Significant Permit Modification**

Source Background and Description

Source Name:	Marathon Ashland Petroleum LLC
Source Location:	4955 Robison Road, Indianapolis, Indiana 46268
County:	Marion
SIC Code:	5171
Operation Permit No.:	T097-16068-00159
Operation Permit Issuance Date:	October 6, 2003
Sig. Permit Mod. No.:	097-19125-00159
Permit Reviewer:	Angelique Oliger

The Office of Air Quality (OAQ) and Office of Environmental Services (OES) have reviewed a permit modification application from Marathon Ashland Petroleum LLC related to amending monitoring conditions in their current Part 70 Operating Permit.

Explanation of the Modification

On May 11, 2004, an application from Marathon Ashland Petroleum LLC was received, requesting an amendment to the frequency of the inspections of the carbon absorber and carbon bed pressure records specified in Condition D.1.9 (a) of the Part 70 Operating Permit. The facility is typically staffed five days per week and operates the truck loading rack with driver loading seven days per week. Both the permanent carbon adsorber vapor recovery unit and the trailer mounted portable vapor combustors are equipped with control circuits to shut down the truck loading, sound an alarm, and notify terminal personnel (even remotely by an autodialer) if a fault condition exists, indicating improper operation, or in the case of the portable combustors, the pilot flame presence is not detected. Therefore, the Permittee has requested that the frequency of compliance monitoring in Condition D.1.9 (a) be changed from once per day to once per scheduled work day.

Justification for Modification

The Part 70 operating permit is being modified through a Part 70 Significant Permit Modification. The source was issued a Title V Permit on October 6, 2003. This is a significant permit modification because it relaxes a monitoring condition. This is a significant permit modification because it does not qualify for a minor permit modification under 326 IAC 2-7-12(b).

Recommendation

The staff recommends to the Administrator that the Part 70 Significant Permit Modification 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 May 10, 2004.

Conclusion

This proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 097-19125-00159.