



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(317) 232-8603  
(800) 451-6027  
[www.in.gov/idem](http://www.in.gov/idem)

**NOTICE OF 30-DAY PERIOD  
FOR PUBLIC COMMENT**

**Preliminary Findings Regarding the Renewal of a Federally Enforceable State Operating Permit  
for Buckeye Terminals, LLC – Clermont Terminal in Hendricks County**

**FESOP No.: F 063-23468-00004**

The Indiana Department of Environmental Management (IDEM) has received an application from Buckeye Terminals, LLC – Clermont Terminal located at 10470 E 300 N, Clermont, Indiana 46234, for the renewal of a Federally Enforceable State Operating Permit (FESOP). IDEM's Office of Air Quality (OAQ) issues this type of permit to regulate the operation of sources that release air pollutants.

IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow Buckeye Terminals, LLC – Clermont Terminal to continue to operate a bulk gasoline terminal. If this would operate 365 days a year, 24 hours a day, 7 days a week, it could potentially release 5.00 tons of PM, 5.00 tons of PM<sub>10</sub>, 2,696 tons of VOC, 60.3 tons of an individual HAP (MTBE), and 150 tons of a combination of all HAPs per year. The FESOP will limit emissions to less than one hundred (100) tons of VOC, less than 10.0 tons of an individual HAP, and less than twenty-five (25.0) tons of a combination of all HAPs per year. The permit requires production limits and the use of air pollution control equipment to limit the amount of air pollution that can be released.

This draft FESOP Renewal does not contain any new equipment that would emit air pollutants, and no conditions from previously issued permits/approvals have been changed.

A copy of the permit application and IDEM's preliminary findings are available at:

Speedway Public Library  
5633 W. 25<sup>th</sup> Street  
Indianapolis, Indiana 46224

A copy of the preliminary findings is available on the Internet at: [www.in.gov/idem/permits/air/pending.html](http://www.in.gov/idem/permits/air/pending.html).

**How can you participate in this process?**

The day after this announcement is published in a newspaper marks the beginning of a 30-day public comment period. During that 30-day period, you may comment on this permit. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this permit. If adverse comments concerning the **air pollution impact** of this permit are received, with a request for a public hearing, IDEM may hold a public hearing. If a public hearing is held, IDEM will make a separate announcement of the date, time, and location of that hearing. At a hearing, you would have an opportunity to submit written comments, make verbal comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation or a request for a public hearing should be sent in writing to IDEM. If you do not want to comment at this time, but would like to be added to IDEM's mailing list to receive notice of future action related to this permit application, please contact IDEM. Please refer to permit number F 063-23468-00004 in all correspondence.

**To Contact IDEM:**

IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 3-6878

Pursuant to Contract No. A 305-5-66, IDEM, OAQ has assigned the processing of this permit application to Meteorological Evaluation Services Co., Inc. Therefore, questions should be directed to Michael A. Morrone of Meteorological Evaluation Services Co., Inc.

**To Contact the Permit Reviewer:**

Michael A. Morrone  
Meteorological Evaluation Services Co., Inc.  
165 Broadway  
Amityville, New York 11701  
Dial directly: (631) 691-3395, ext. 15  
E-mail: mmorrone@mesamity.com

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

**What will happen after IDEM makes a decision?**

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 North Senate Avenue, Indianapolis.

If you have any questions please contact Michael A. Morrone at the above address.

Nisha Sizemore, Chief  
Permits Branch  
Office of Air Quality

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: [www.in.gov/idem/permits/guide/](http://www.in.gov/idem/permits/guide/).

MAM/MES



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

DRAFT

100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(317) 232-8603  
(800) 451-6027  
www.in.gov/idem

# Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Buckeye Terminals, LLC - Clermont Terminal  
10470 E 300 N  
Clermont, Indiana 46234**

(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. 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.**

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.

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 063-23468-00004	
Issued by/Original Signed By:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: September 26, 2007  Expiration Date: September 26, 2012

## TABLE OF CONTENTS

<b>SECTION A</b>	<b>SOURCE SUMMARY</b> .....	4
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
<b>SECTION B</b>	<b>GENERAL CONDITIONS</b> .....	6
B.1	Definitions [326 IAC 2-8-1]	
B.2	Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Severability [326 IAC 2-8-4(4)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.9	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11	Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.12	Emergency Provisions [326 IAC 2-8-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14	Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]	
B.17	Permit Renewal [326 IAC 2-8-3(h)]	
B.18	Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]	
B.19	Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]	
B.20	Source Modification Requirement [326 IAC 2-8-11.1] [326 IAC 2-2-2] [326 IAC 2-3-2]	
B.21	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.24	Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]	
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS</b> .....	15
	<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	<b>Testing Requirements [326 IAC 2-8-4(3)]</b>	
C.8	Performance Testing [326 IAC 3-6]	
	<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.9	Compliance Requirements [326 IAC 2-1.1-11]	

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

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

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

- C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

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

- C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

- C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

**SECTION D.1 FACILITY OPERATION CONDITIONS: Tank Truck Loading Rack and Storage Tanks 22**

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

- D.1.1 Volatile Organic Compounds [326 IAC 2-3] [326 IAC 2-8-4]
- D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]
- D.1.3 Volatile Organic Compounds [326 IAC 8-4-3]
- D.1.4 Volatile Organic Compounds [326 IAC 8-4-4]
- D.1.5 Volatile Organic Compounds [326 IAC 8-4-9]
- D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.1.7 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]
- D.1.8 Volatile Organic Compounds (VOC) Control

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

- D.1.9 Monitoring

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

- D.1.10 Record Keeping Requirements
- D.1.11 Reporting Requirements

<b>Certification Form</b> .....	27
<b>Emergency/Occurrence Form</b> .....	28
<b>Quarterly Report Form</b> .....	30
<b>Quarterly Deviation and Compliance Monitoring Report Form</b> .....	31

## 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)]

---

The Permittee owns and operates a bulk gasoline terminal.

Source Address:	10470 E 300 N, Clermont, Indiana 46234
Mailing Address:	P.O. Box 368, Emmaus, Pennsylvania 18049
General Source Phone Number:	(484) 232-4491
SIC Code:	5171
County Location:	Hendricks
Source Location Status:	Nonattainment for PM <sub>2.5</sub> and 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

---

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

- (a) One (1) truck loading rack, constructed in 1963, identified as #12, equipped with a flare vapor combustion unit (VCU), installed in 1993, and a vapor collection system, capacity: 99,000 gallons of petroleum products and/or denatured ethanol per hour and a throughput of 867,240,000 gallons of petroleum products and/or denatured ethanol per year.
- (b) Two (2) fixed roof cone storage tanks, constructed in 1962, identified as Tanks # 1 and #2, capacity: 1,260,000 gallons of petroleum products (excluding gasoline), each.
- (c) Two (2) internal floating roof storage tanks, constructed in 1962, identified as Tanks # 3 and #4, capacity: 1,260,000 gallons of petroleum products, each.
- (d) Two (2) internal floating roof storage tanks, identified as Tank #5, constructed in 1969, and Tank #6, constructed in 1971, capacity: 3,360,000 gallons of petroleum products, each.
- (e) One (1) fixed roof cone storage tank, identified as Tank #7, constructed in 1963, capacity: 42,000 gallons of petroleum products (excluding gasoline) and denatured ethanol.
- (f) Three (3) fixed roof cone storage tanks, identified as Tanks #8 through #10, constructed in 1991, capacity: 30,000 gallons of petroleum products (excluding gasoline), each.
- (g) One (1) fixed roof cone storage tank, identified as Tank #11, constructed in 1991, capacity: 10,000 gallons of petroleum products (excluding gasoline).

### A.3 Specifically Regulated 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 which are specifically regulated, as defined in 326 IAC 2-7-1(21):

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

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) to renew for a Federally Enforceable State Operating Permit (FESOP).

## **SECTION B GENERAL CONDITIONS**

### **B.1 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.2 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]**

- 
- (a) This permit, F 063-23468-00004, 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 of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

### **B.3 Term of Conditions [326 IAC 2-1.1-9.5]**

---

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### **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 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.6 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.7 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 an "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.8 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. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 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 no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (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, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.10 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.11 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) 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 PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) 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.12 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 describe 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 Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865

- (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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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 an "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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, 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) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

---

- (a) All terms and conditions of permits established prior to F 063-23468-00004 and issued pursuant to permitting programs approved into the state implementation plan have been either:

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted.

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

**B.14 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.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

---

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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 not need to be included in this report.

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

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

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

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modi-

fication, 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 an "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.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and 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 an "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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) 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) 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 being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by an "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.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a 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 limitations provided in 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- 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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)

through (d). The Permittee shall make such records available, upon reasonable request, for 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 emissions increases and decreases at 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.
- (d) **Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.**

**B.20 Source Modification Requirement [326 IAC 2-8-11.1]**

---

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]**

---

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

---

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "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.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission 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 [326 IAC 6-3-2]

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 five hundred fifty-one thousandths (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) The 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. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(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]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 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 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 two hundred sixty (260) linear feet on pipes or one hundred sixty (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  
MC 61-52 IGCN 1003  
Indianapolis, Indiana 46204-2251

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 an "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 seventy-five hundredths (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.

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

#### **C.8 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "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 an "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 Permittee 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.9 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 commis-

sioner or the U.S. EPA.

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

#### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

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

#### **C.11 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.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

#### **C.13 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.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air

pollution control practices for minimizing emissions.

- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

C.15 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 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

### **C.16 General Record Keeping 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 record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

### **C.17 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 an "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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## **Stratospheric Ozone Protection**

### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

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

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



- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: Truck loading rack and storage tanks

- (a) One (1) truck loading rack, constructed in 1963, identified as #12, equipped with a flare vapor combustion unit (VCU), installed in 1993, and a vapor collection system, capacity: 99,000 gallons of petroleum products and/or denatured ethanol per hour and a throughput of 867,240,000 gallons of petroleum products and/or denatured ethanol per year.
- (b) Two (2) fixed roof cone storage tanks, constructed in 1962, identified as Tanks #1 and #2, capacity: 1,260,000 gallons of petroleum products (excluding gasoline), each.
- (c) Two (2) internal floating roof storage tanks, constructed in 1962, identified as Tanks #3 and #4, capacity: 1,260,000 gallons of petroleum products, each.
- (d) Two (2) internal floating roof storage tanks, identified as Tank #5, constructed in 1969, and Tank #6, constructed in 1971, capacity: 3,360,000 gallons of petroleum products, each.
- (e) One (1) fixed roof cone storage tank, identified as Tank #7, constructed in 1963, capacity: 42,000 gallons of petroleum products (excluding gasoline) and denatured ethanol.
- (f) Three (3) fixed roof cone storage tanks, identified as Tanks #8 through #10, constructed in 1991, capacity: 30,000 gallons of petroleum products (excluding gasoline), each.
- (g) One (1) fixed roof cone storage tank, identified as Tank #11, constructed in 1991, capacity: 10,000 gallons of petroleum products (excluding gasoline).

(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 Volatile Organic Compounds [326 IAC 2-3] [326 IAC 2-8-4]

- (a) The throughput of petroleum products and/or denatured ethanol at the tank trucking loading rack, identified as #12, shall be limited to 709,813,559 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month, which is equivalent to VOC emissions of 83.8 tons per year
- (b) The VOC emissions from the tank truck loading rack shall not exceed 0.236 pounds of VOC per one thousand (1,000) gallons of throughput.

Compliance with these limitations, in combination with unrestricted potential VOC emissions from the eleven (11) storage tanks, identified as Tank #1 through Tank #11, and from insignificant activities, shall render this source, which is not one (1) of the twenty-eight (28) source categories, a minor source pursuant to 326 IAC 2-3, Emission Offset, and shall make the requirements of 326 IAC 2-3, Emission Offset, not applicable.

#### D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

- (a) Compliance with the throughput limit described in Condition D.1.1 shall limit the individual HAP emissions to less than 1.55 tons per year and the combination of all HAPs to less than 4.28 tons per year from the tank truck loading rack, identified as #12.
- (b) The individual HAP emissions shall be limited to less than ten (10.0) tons per year and the combination of all HAPs emissions shall be limited to less than twenty-five (25.0) tons per

year from the entire source.

Compliance with these limitations shall make the requirements of 326 IAC 2-7, Part 70, not applicable.

D.1.3 Volatile Organic Compounds [326 IAC 8-4-3]

Pursuant to 326 IAC 8-4-3, the four (4) storage tanks, identified as Tank #3 through Tank #6, shall be equipped with internal floating roofs.

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

(a) Pursuant to 326 IAC 8-4-4, no owner or operator of a bulk gasoline terminal shall permit the loading of gasoline into any transport, excluding railroad tank cars, or barges, unless:

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

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

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

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

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

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

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

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

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

Pursuant to 326 IAC 8-4-9 (Leaks from transports and vapor collection systems; records), the owner or operator of a vapor balance system or vapor control system shall:

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

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

(A) Conduct the pressure and vacuum tests for the transport's cargo tank using a time period of five (5) minutes. The initial pressure for the pressure test shall be four hundred sixty (460) millimeters H<sub>2</sub>O (eighteen (18) inches H<sub>2</sub>O) gauge. The initial vacuum for the vacuum test shall be one hundred fifty

- (150) millimeters H<sub>2</sub>O (six (6) inches H<sub>2</sub>O) gauge. The maximum allowable pressure or vacuum change is twenty-five (25) millimeters H<sub>2</sub>O (one (1) inch H<sub>2</sub>O) in five (5) minutes.
- (B) Conduct the pressure test of the cargo tank's internal vapor valve as follows:
- (i) After completing the test under clause (A), use the procedures in 40 CFR 60, Appendix A, Method 27\* to repressurize the tank to four hundred sixty (460) millimeters H<sub>2</sub>O (eighteen (18) inches H<sub>2</sub>O) gauge. Close the transport's internal vapor valve or valves, thereby isolating the vapor return line and manifold from the tank.
  - (ii) Relieve the pressure in the vapor return line to atmospheric pressure, then reseal the line. After five (5) minutes, record the gauge pressure in the vapor return line and manifold. The maximum allowable five (5) minute pressure increase is one hundred thirty (130) millimeters H<sub>2</sub>O (five (5) inches H<sub>2</sub>O).
- (2) Repairs by the gasoline transport owner or operator, if the transport does not meet the criteria of subdivision (1), and retesting to prove compliance with the criteria of subdivision (1).
- (b) The annual test data remain valid until the end of the twelfth calendar month following the test. The owner of the gasoline transport shall be responsible for compliance with subsection (b) and shall provide the owner of the loading facility with the most recent valid modified 40 CFR 60, Appendix A, Method 27\* test results upon request. The owner of the loading facility shall take all reasonable steps, including reviewing the test date and tester's signature, to ensure that gasoline transports loading at its facility comply with subsection (a).
- (c) Design and operate the applicable system and the gasoline loading equipment in a manner that prevents:
- (1) Gauge pressure from exceeding four thousand five hundred (4,500) pascals (eighteen (18) inches of H<sub>2</sub>O) and a vacuum from exceeding one thousand five hundred (1,500) pascals (six (6) inches of H<sub>2</sub>O) in the gasoline transport;
  - (2) Except for sources subject to 40 CFR 60.503(b) (Standards of Performance for New Stationary Sources) or 40 CFR 63.425(a) (National Emission Standards for Hazardous Air Pollutants) requirements, a reading equal to or greater than twenty-one thousand (21,000) parts per million as propane, from all points on the perimeter of a potential leak source when measured by the method referenced in 40 CFR 60, Appendix A, Method 21, or an equivalent procedure approved by the commissioner during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and
  - (3) Avoidable visible liquid leaks during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and
- (d) Within fifteen (15) days, repair and retest a vapor balance, collection, or control system that exceeds the limits in subdivision (a).
- (e) Maintain records of all certification testing, identifying the following:

- (1) The vapor balance, vapor collection, or vapor control system.
- (2) The date of the test and, if applicable, retest.
- (3) The results of the test and, if applicable, retest.

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

- (f) During compliance tests conducted under 326 IAC 3-6 (stack testing), each vapor balance or control system shall be tested applying the standards described in 326 IAC 8-4-9 (d)(1)(B). Testers shall use 40 CFR 60, Appendix A, Method 21 to determine if there are any leaks from the hatches and the flanges of the gasoline transports. If any leak is detected, the transport cannot be used for the capacity of the compliance test of the bulk gas terminal. The threshold for leaks shall be as follows:
- (1) Five hundred (500) parts per million methane for all bulk gas terminals subject to NESHAP/MACT (40 CFR 63, Subpart R).
  - (2) Ten thousand (10,000) parts per million methane for all bulk gas terminals subject to New Source Performance Standards (40 CFR 60, Subpart XX) and for all other bulk gas terminals.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the tank truck loading rack and its flare vapor combustion unit and its vapor collection system.

### **Compliance Determination Requirements**

#### **D.1.7 Testing Requirements [326 IAC 2-8-5(a)(1), (4) [326 IAC 2-1.1-11]**

Within ninety (90) days after restart of the terminal, in order to demonstrate compliance with Condition D.1.5, the Permittee shall perform VOC testing for the tank truck loading rack utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

#### **D.1.8 Volatile Organic Compounds (VOC) Control**

In order to comply with Conditions D.1.1 and D.1.5, the flare vapor combustion unit and the vapor collection system shall be in operation and control emissions from the tank truck loading rack at all times when the tank truck loading rack is in operation.

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

#### **D.1.9 Monitoring**

To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform daily checks of the key operating parameters for the flare vapor combustion unit, including pilot flame presence.

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

#### **D.1.10 Record Keeping Requirements**

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records at the source of the volume (in gallons) of each fuel received, including purchase orders and invoices necessary to verify the type and amount used.

- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records all certification testing, identifying the following:
  - (1) The vapor balance, vapor collection, or vapor control system.
  - (2) The date of the test and, if applicable, retest.
  - (3) The results of the test and, if applicable, retest.

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

- (c) To document compliance with Condition D.1.2, the Permittee shall maintain records at the source of the fuels used that contain any HAPs. The records shall be complete and sufficient to establish compliance with the HAP emission limits in Condition D.1.2. 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.
- (d) To document compliance with Condition D.1.9, the Permittee shall maintain records of the pilot flame presence when the flare vapor combustion unit is in operation.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 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. The report submitted by the Permittee does require 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**

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

Source Name: Buckeye Terminals, LLC - Clermont Terminal  
Source Address: 10470 E 300 N, Clermont, Indiana 46234  
Mailing Address: P.O. Box 368, Emmaus, Pennsylvania 18049  
FESOP No.: F 063-23468-00004

**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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

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

Source Name: Buckeye Terminals, LLC - Clermont Terminal  
Source Address: 10470 E 300 N, Clermont, Indiana 46234  
Mailing Address: P.O. Box 368, Emmaus, Pennsylvania 18049  
FESOP No.: F 063-23468-00004

**This form consists of 2 pages**

**Page 1 of 2**

- |   |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|---|

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <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: Buckeye Terminals, LLC - Clermont Terminal  
Source Address: 10470 E 300 N, Clermont, Indiana 46234  
Mailing Address: P.O. Box 368, Emmaus, Pennsylvania 18049  
FESOP No.: F 063-23468-00004  
Facility: Tank truck loading rack  
Parameter: Petroleum Products and/or denatured ethanol throughput  
Limit: 709,813,559 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

Month	Petroleum Products and/or denatured ethanol loaded (gallons)	Petroleum Products and/or denatured ethanol loaded (gallons)	Petroleum Products and/or denatured ethanol loaded (gallons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
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: Buckeye Terminals, LLC - Clermont Terminal  
Source Address: 10470 E 300 N, Clermont, Indiana 46234  
Mailing Address: P.O. Box 368, Emmaus, Pennsylvania 18049  
FESOP No.: F 063-23468-00004

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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does 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>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<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>	
<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>	

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**Indiana Department of Environmental Management**  
Office of Air Quality

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

### Source Background and Description

<b>Source Name:</b>	Buckeye Terminals, LLC – Clermont Terminal
<b>Source Location:</b>	10470 E 300 N, Clermont, Indiana 46234
<b>County:</b>	Hendricks
<b>SIC Code:</b>	5171
<b>Permit Renewal No.:</b>	F 063-23468-00004
<b>Permit Reviewer:</b>	Michael A. Morrone/MES

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Buckeye Terminals, LLC – Clermont Terminal (formerly Equilon Enterprises, LLC) relating to the operation of a bulk gasoline terminal.

### History

On August 7, 2006, Buckeye Terminals, LLC – Clermont Terminal submitted an application to the OAQ requesting to renew its operating permit. Buckeye Terminals, LLC – Clermont Terminal was issued a FESOP Renewal (F 063-14875-00004) on July 2, 2002.

In an e-mail dated August 24, 2007, Buckeye Terminals, LLC – Clermont Terminal stated that the terminal has been idle since October 1, 2004 when they purchased the facility from Equilon Enterprises, LLC. However, they stated they wish to keep the permit active in case the terminal can be restarted.

The last compliant VOC emissions test for the truck loading rack was conducted on November 2, 2000. Another stack test was required by Condition D.1.8(a) of F 063-14875-00004, issued on July 7, 2002, by November 7, 2002. This test was never completed by the former owner of the company, Equilon Enterprises, LLC. As a result, to keep this permit valid and active, and to demonstrate compliance with 40 CFR 60, Subpart XX, a VOC compliance test of the truck loading rack will be required within ninety (90) days after restart of this terminal.

### Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) truck loading rack, constructed in 1963, identified as #12, equipped with a flare vapor combustion unit (VCU), installed in 1993, and a vapor collection system, capacity: 99,000 gallons of petroleum products and/or denatured ethanol per hour and a throughput of 867,240,000 gallons of petroleum products and/or denatured ethanol per year.
- (b) Two (2) fixed roof cone storage tanks, constructed in 1962, identified as Tanks #1 and #2, capacity: 1,260,000 gallons of petroleum products (excluding gasoline), each.
- (c) Two (2) internal floating roof storage tanks, constructed in 1962, identified as Tanks #3 and #4, capacity: 1,260,000 gallons of petroleum products, each.
- (d) Two (2) internal floating roof storage tanks, identified as Tank #5, constructed in 1969, and Tank #6, constructed in 1971, capacity: 3,360,000 gallons of petroleum products, each.

- (e) One (1) fixed roof cone storage tank, identified as Tank #7, constructed in 1963, capacity: 42,000 gallons of petroleum products (excluding gasoline) and denatured ethanol.
- (f) Three (3) fixed roof cone storage tanks, identified as Tanks #8 through #10, constructed in 1991, capacity: 30,000 gallons of petroleum products (excluding gasoline), each.
- (g) One (1) fixed roof cone storage tank, identified as Tank #11, constructed in 1991, capacity: 10,000 gallons of petroleum products (excluding gasoline).

### **Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit**

The source does not contain any emission units or pollution control equipment that have been constructed and/or operated without a permit.

### **Emission Units and Pollution Control Equipment Removed From the Source**

No emission units and pollution control equipment have been removed from the source.

### **Insignificant Activities**

The source also includes the following insignificant activities:

- (a) The following VOC and HAP storage containers: Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (b) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

### **Existing Approvals**

Since the issuance of the **FESOP 063-14875-00004** on July 2, 2002, the source has constructed or has been operating under the following approvals as well:

Administrative Amendment 063-20028-00004, issued on October 21, 2004.

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

### **Enforcement Issue**

There are no enforcement actions pending.

### **Stack Summary**

This source is a bulk gasoline terminal and has no stacks in operation.

### **Emission Calculations**

See Appendix A of this document for detailed emission calculations.

## County Attainment Status

The source is located in Hendricks County

Pollutant	Status
PM <sub>10</sub>	attainment
PM <sub>2.5</sub>	nonattainment
SO <sub>2</sub>	attainment
NO <sub>x</sub>	attainment
8-hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

- (a) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Hendricks County as nonattainment for PM<sub>2.5</sub>. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone standards. Hendricks County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.
- (c) Hendricks County has been classified as attainment or unclassifiable in Indiana for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 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 emissions are not counted toward determination of PSD or Emission Offset applicability.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	0.00
PM <sub>10</sub>	0.00
SO <sub>2</sub>	0.00
VOC	2,696
CO	0.00
NO <sub>x</sub>	0.00

HAPs	tons/year
MTBE	60.3
Xylene	20.2
Toluene	20.1
2,2,4 Trimethylpentane	18.2
n-Hexane	16.1
Benzene	9.09
Cumene	0.055
Napthalene	0.006
Total	150

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than one hundred (100) tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their VOC emissions to less than Title V levels, therefore the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other attainment criteria pollutants are less than one hundred (<100) tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the source has agreed to limit their single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP.

#### Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

### Actual Emissions

No previous emission data has been received from the source.

### Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP 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 (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Truck Tank Rack Loading	0.00	0.00	0.00	83.8	0.00	0.00	1.55 single (MTBE); 4.28 total
Tank #1	0.00	0.00	0.00	0.228	0.00	0.00	0.003 single (Toluene); 0.007 total
Tank #2	0.00	0.00	0.00	0.172	0.00	0.00	0.003 single (Toluene); 0.005 total
Tank #3	0.00	0.00	0.00	2.07	0.00	0.00	0.046 single (MTBE); 0.085 total
Tank #4	0.00	0.00	0.00	2.06	0.00	0.00	0.046 single (MTBE); 0.085 total
Tank #5	0.00	0.00	0.00	4.24	0.00	0.00	0.095 single (MTBE); 0.174 total
Tank #6	0.00	0.00	0.00	4.25	0.00	0.00	0.095 single (MTBE); 0.175 total
Tank #7	0.00	0.00	0.00	0.671	0.00	0.00	0.027 single (Toluene); 0.073 total
Tank #8	0.00	0.00	0.00	0.012	0.00	0.00	0.0002 single (Toluene); 0.0004 total
Tank #9	0.00	0.00	0.00	0.012	0.00	0.00	0.0002 single (Toluene); 0.0004 total
Tank #10	0.00	0.00	0.00	0.012	0.00	0.00	0.0002 single (Toluene); 0.0004 total
Tank #11	0.00	0.00	0.00	0.001	0.00	0.00	0.00001 single (Toluene); 0.00002 total
Insignificant Activities	5.00	5.00	0.00	1.00	0.00	0.00	1.00
<b>Total</b>	<b>5.00</b>	<b>5.00</b>	<b>0.00</b>	<b>Less than 100</b>	<b>0.00</b>	<b>0.00</b>	<b>Less than 10.0 single; Less than 25.0 total</b>
<b>Major Source Threshold</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>100</b>	<b>250</b>	<b>250</b>	<b>-</b>

- (a) This existing stationary source is not major for PSD because the emissions of each attainment criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is not major for Emission Offset because source has agreed to limit the emissions of the nonattainment pollutant, VOC, to less than one hundred (<100) tons per year.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

### **Federal Rule Applicability**

The following federal rules are applicable to the source:

- (a) This source is not a petroleum refinery. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart J, Standards of Performance for Petroleum Refineries, are not included in the permit.
- (b) The seven (7) storage tanks, identified as Tank #1 through Tank #7, each have capacities of greater than 40,000 gallons. However, all were constructed before June 11, 1973. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978, are not included in the permit.
- (c) The four (4) storage tanks, identified as Tank #8 through Tank #11, were constructed after May 19, 1978. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978, are not included in the permit.
- (d) The seven (7) storage tanks, identified as Tank #1 through Tank #7, each have capacities of greater than 40,000 gallons. However, all were constructed before May 18, 1978. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, are not included in the permit.
- (e) The four (4) storage tanks, identified as Tank #8 through Tank #11, were constructed after July 23, 1984. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, are not included in the permit.
- (f) The seven (7) storage tanks, identified as Tank #1 through Tank #7, each have capacities of greater than 75 m<sup>3</sup> (19,812.9 gallons). However, all were constructed before July 23, 1984. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, are not included in the permit.

- (g) The three (3) storage tanks, identified as Tank #8 through Tank #10, were constructed after July 23, 1984 and have capacities of greater than 75 m<sup>3</sup> (19,812.9 gallons), each. However, pursuant to 40 CFR 60.110b(4), each of the tanks have a capacity of less than 1,589.874 m<sup>3</sup> and are used for petroleum or condensate stored, processed, or treated prior to custody transfer. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, are not included in the permit.
- (h) The storage tank, identified as Tank #11, was constructed after July 23, 1984, but has a capacity of less than 75 m<sup>3</sup> (19,812.9 gallons). Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, are not included in the permit.
- (i) The truck loading rack, identified as #12, was constructed in 1963, which is before December 17, 1980. The addition of a vapor combustion unit in 1993 was not considered a modification because it is a control device. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals, are not included in the permit.
- (j) This source is not a petroleum refinery. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart GGG, Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries, are not included in the permit.
- (k) There are no other New Source Performance Standards (40 CFR 60 and 326 IAC 12) included in the permit for this source.
- (l) This source is an area source for HAPs. Therefore, the requirements of the National Emission Standard for Hazardous Air Pollutants, 40 CFR 63, Subpart R, National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations), are not included in the permit for this source.
- (m) This source is an area source for HAPs. Therefore, the requirements of the National Emission Standard for Hazardous Air Pollutants, 40 CFR 63, Subpart CC, National Emission Standards for Hazardous Air Pollutants From Petroleum Refineries, are not included in the permit for this source.
- (n) There are no other National Emission Standards for Hazardous Air Pollutants (40 CFR 63) included in the permit for this source.

### **State Rule Applicability – Entire Source**

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

The unrestricted potential to emit of each attainment criteria pollutants is less than two hundred and fifty (250) tons per year. Therefore, this source, which is not one (1) of the twenty-eight (28) listed source categories, is a minor source pursuant to 326 IAC 2-2, PSD.

### 326 IAC 2-3 (Emission Offset)

The unrestricted potential to emit VOC is greater than one hundred (100) tons per year. However, the source will limit VOC emissions to less than one hundred (100) tons per year as specified below:

- (1) The throughput of petroleum products and/or denatured ethanol at the tank trucking loading rack, identified as #12, shall be limited to 709,813,559 gallons per twelve (12) consecutive month period, equivalent to 83.8 tons per year, with compliance determined at the end of each month.
- (2) The VOC emissions from the tank truck loading rack shall not exceed 0.236 pounds of VOC per one thousand (1,000) gallons of throughput.

Compliance with these limitations, in combination with the unrestricted potential to emit VOC from storage tanks #1 through #11 and from insignificant activities shall make this source, which is not one (1) of the twenty-eight (28) source categories, a minor source pursuant to 326 IAC 2-3, Emission Offset.

### 326 IAC 2.4-1 (Major Sources of Hazardous Air Pollutants (HAPs))

All emission units in operation at this source were constructed before the July 27, 1997 applicability date of this rule. Therefore, the requirements of 326 IAC 2.4-1 (Major Sources of Hazardous Air Pollutants (HAPs)) are not applicable.

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

This source is located in Hendricks County and the potential to emit of each criteria pollutant is less than one hundred (<100) tons per year. Therefore, 326 IAC 2-6 does not apply.

### 326 IAC 2-8-4 (FESOP)

This source, which is not one (1) of the twenty-eight (28) listed source categories, shall comply with the following requirements to render the requirements of 326 IAC 2-7, Part 70, not applicable:

- (a) The petroleum products and/or denatured ethanol throughput at the tank truck loading rack, identified as #12, shall be limited to 709,819,559 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC emissions from the tank truck loading rack, identified as #12, shall not exceed 0.236 pounds of VOC per one thousand (1,000) gallons of throughput.
- (c) As a result of the limits described in (a) and (b) above, the amount of an individual HAP shall be limited to less than 1.55 tons per year and the amount of a combination of all HAPs shall be limited to less than 4.28 tons per year from the tank truck loading rack, identified as #12, and less than ten (10.0) tons per year for an individual HAP and less than twenty-five (25.0) tons per year for a combination of all HAPs from the entire source.
- (d) The flare vapor combustion unit and the vapor collection system shall be in operation and control emissions from the tank truck loading rack, identified as #12, at all times that the facility is in operation.

### 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 the 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.

### 326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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).

### **State Rule Applicability – Individual Facilities**

#### 326 IAC 8-1-6 (New facilities; general reduction requirements)

- (a) The truck loading rack, identified as #12, is subject to 326 IAC 8-4-4 (Bulk Gasoline Terminals). Therefore, pursuant to 326 IAC 8-1-6(3)(A), the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) are not applicable to this facility.
- (b) The seven (7) storage tanks, identified as Tank #1 through Tank #7, were constructed prior to January 1, 1980. Therefore, the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) are not applicable.
- (c) The four (4) storage tanks, identified as Tank #8 through Tank #11, were all constructed after January 1, 1980, but have VOC emissions of less than twenty-five (25.0) tons per year, each. Therefore, pursuant to 326 IAC 8-1-6(1), the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) are not applicable to these facilities.

#### 326 IAC 8-4-2 (Petroleum Refineries)

This source is not a petroleum refinery. Therefore, the requirements of 326 IAC 8-4-2 (Petroleum Refineries) are not applicable.

#### 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

- (a) The three (3) storage tanks, identified as Tank #1, Tank #2, and Tank #7, each have capacities of greater than 39,000 gallons, but store petroleum liquid with true vapor pressures of less than 10.5 kPa (1.52 psia). Therefore, the requirements of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities) are not applicable to these facilities.
- (b) The four (4) storage tanks, identified as Tank #8 through Tank #11, each have capacities of less than 39,000 gallons. Therefore, the requirements of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities) are not applicable to these facilities.
- (c) The four (4) storage tanks, identified as Tank #3 through Tank #6, each have capacities greater than 39,000 gallons and store petroleum liquids with true vapor pressures of

greater than 10.5 kPa (1.52 psia). Therefore, the requirements of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities) are applicable to these facilities. Pursuant to 326 IAC 8-4-3, the four (4) storage tanks, identified as Tank #3 through Tank #6, shall comply with the following record keeping and reporting requirements:

Owners or operators of petroleum liquid storage vessels shall maintain records of the types of volatile petroleum liquid stored, the maximum true vapor pressure of the liquid as stored, and the results of the inspections performed on the storage vessels. Such records shall be maintained for a period of two (2) years and shall be made available to the commissioner upon written request.

The four (4) storage tanks, identified as Tank #3 through Tank #6, are equipped with internal floating roofs and can comply with this rule.

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

- (a) This source is a bulk gasoline terminal. Pursuant to 326 IAC 8-4-4 (Bulk Gasoline Terminals), no owner or operator of a bulk gasoline terminal shall permit the loading of gasoline into any transport, excluding railroad tank cars, or barges, unless:
  - (1) The bulk gasoline terminal is equipped with a vapor control system, in good working order, in operation and consisting of one of the following:
    - (A) An adsorber or condensation system which processes and recovers vapors and gases from the equipment being controlled, releasing no more than 80 mg/l of VOC to the atmosphere.
    - (B) A vapor collection system which directs all vapors to a fuel gas system or incinerator.
    - (C) An approved control system, demonstrated to have control efficiency equivalent to or greater than clause (A) above.
  - (2) Displaced vapors and gases are vented only to the vapor control system.
  - (3) A means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
  - (4) All loading and vapor lines are equipped with fittings which make vapor-tight connections and which will be closed upon disconnection.
- (b) If employees of the owner of the bulk gasoline terminal are not present during loading, it shall be the responsibility of the owner of the transport to make certain the vapor control system is attached to the transport. The owner of the terminal shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with this section.

This source operates a vapor collection system and a flare vapor combustion unit at the tank truck loading rack, identified as #12, and is therefore can comply with this rule.

#### 326 IAC 8-4-5 (Bulk Gasoline Plants)

This source is not a bulk gasoline plants. Therefore, the requirements of 326 IAC 8-4-5 (Bulk Gasoline Plants) are not applicable.

### 326 IAC 8-4-6 (Gasoline Dispensing Facilities)

This source is not a gasoline dispensing facility. Therefore, the requirements of 326 IAC 8-4-6 (Gasoline Dispensing Facilities) are not applicable.

### 326 IAC 8-4-7 (Gasoline Transports)

This source is not a gasoline transport. Therefore, the requirements of 326 IAC 8-4-7 (Gasoline Transports) are not applicable.

### 326 IAC 8-4-8 (Leaks from petroleum refineries; monitoring; reports)

This source is not a petroleum refinery. Therefore, the requirements of 326 IAC 8-4-8 (Leaks from petroleum refineries; monitoring; reports) are not applicable.

### 326 IAC 8-4-9 (Leaks from transports and vapor collection systems; records)

This source is subject to 326 IAC 8-4-4 and operates a vapor collection system. Therefore, pursuant to 326 IAC 8-4-9(a)(1), the requirements of 326 IAC 8-4-9 (Leaks from transports and vapor collection systems; records) are applicable to this source. Pursuant to 326 IAC 8-4-9, the owner or operator of a vapor balance system or vapor control system shall:

- (a) No person shall allow a gasoline transport that is subject to this rule and that has a capacity of two thousand (2,000) gallons or more to be filled or emptied unless the gasoline transport completes the following:
  - (1) Annual leak detection testing before the end of the twelfth calendar month following the previous year's test, according to test procedures contained in 40 CFR 63.425(e), as follows:
    - (A) Conduct the pressure and vacuum tests for the transport's cargo tank using a time period of five (5) minutes. The initial pressure for the pressure test shall be four hundred sixty (460) millimeters H<sub>2</sub>O (eighteen (18) inches H<sub>2</sub>O) gauge. The initial vacuum for the vacuum test shall be one hundred fifty (150) millimeters H<sub>2</sub>O (six (6) inches H<sub>2</sub>O) gauge. The maximum allowable pressure or vacuum change is twenty-five (25) millimeters H<sub>2</sub>O (one (1) inch H<sub>2</sub>O) in five (5) minutes.
    - (B) Conduct the pressure test of the cargo tank's internal vapor valve as follows:
      - (i) After completing the test under clause (A), use the procedures in 40 CFR 60, Appendix A, Method 27\* to repressurize the tank to four hundred sixty (460) millimeters H<sub>2</sub>O (eighteen (18) inches H<sub>2</sub>O) gauge. Close the transport's internal vapor valve or valves, thereby isolating the vapor return line and manifold from the tank.
      - (ii) Relieve the pressure in the vapor return line to atmospheric pressure, then reseal the line. After five (5) minutes, record the gauge pressure in the vapor return line and manifold. The maximum allowable five (5) minute pressure increase is one hundred thirty (130) millimeters H<sub>2</sub>O (five (5) inches H<sub>2</sub>O).

- (2) Repairs by the gasoline transport owner or operator, if the transport does not meet the criteria of subdivision (1), and retesting to prove compliance with the criteria of subdivision (1).
- (b) The annual test data remain valid until the end of the twelfth calendar month following the test. The owner of the gasoline transport shall be responsible for compliance with subsection (b) and shall provide the owner of the loading facility with the most recent valid modified 40 CFR 60, Appendix A, Method 27\* test results upon request. The owner of the loading facility shall take all reasonable steps, including reviewing the test date and tester's signature, to ensure that gasoline transports loading at its facility comply with subsection (a).
- (c) Design and operate the applicable system and the gasoline loading equipment in a manner that prevents:
  - (1) Gauge pressure from exceeding four thousand five hundred (4,500) pascals (eighteen (18) inches of H<sub>2</sub>O) and a vacuum from exceeding one thousand five hundred (1,500) pascals (six (6) inches of H<sub>2</sub>O) in the gasoline transport;
  - (2) Except for sources subject to 40 CFR 60.503(b) (Standards of Performance for New Stationary Sources) or 40 CFR 63. 425(a) (National Emission Standards for Hazardous Air Pollutants) requirements, a reading equal to or greater than twenty-one thousand (21,000) parts per million as propane, from all points on the perimeter of a potential leak source when measured by the method referenced in 40 CFR 60, Appendix A, Method 21, or an equivalent procedure approved by the commissioner during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and
  - (3) Avoidable visible liquid leaks during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and
- (d) Within fifteen (15) days, repair and retest a vapor balance, collection, or control system that exceeds the limits in subdivision (a).
- (e) Maintain records of all certification testing, identifying the following:
  - (1) The vapor balance, vapor collection, or vapor control system.
  - (2) The date of the test and, if applicable, retest.
  - (3) The results of the test and, if applicable, retest.

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

- (f) During compliance tests conducted under 326 IAC 3-6 (stack testing), each vapor balance or control system shall be tested applying the standards described in 326 IAC 8-4-9 (d)(1) (B). Testers shall use 40 CFR 60, Appendix A, Method 21 to determine if there are any leaks from the hatches and the flanges of the gasoline transports. If any leak is detected, the transport cannot be used for the capacity of the compliance test of the bulk gas terminal. The threshold for leaks shall be as follows:
  - (1) Five hundred (500) parts per million methane for all bulk gas terminals subject to NESHAP/MACT (40 CFR 63, Subpart R).

- (2) Ten thousand (10,000) parts per million methane for all bulk gas terminals subject to New Source Performance Standards (40 CFR 60, Subpart XX) and for all other bulk gas terminals.

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

This source is located in Hendricks County. Therefore, pursuant to 326 IAC 8-9-1(a), the requirements of 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) are not applicable to this source.

**Previous Stack Tests**

On November 2, 2000, the previous owner conducted a VOC emissions test of the loading rack to demonstrate compliance with Condition D.1.1(b) of F 063-5123-00004, which required VOC emissions not to exceed 35 milligrams per liter of gasoline loaded. The facility was found to be in compliance with this limit.

**Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in 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 Determination Requirements applicable to this source are as follows:

The tank truck loading rack, identified as #12, has applicable compliance determination conditions as specified below:

- (1) Within ninety (90) days after restart of the terminal, the Permittee shall perform VOC testing at the flare vapor combustion unit and the vapor collection system that controls emissions from the tank truck loading rack.
- (2) The flare vapor combustion unit and the vapor collection system shall be in operation and control emissions from the tank truck loading rack at all times when the facility is in operation.

The Compliance Monitoring Requirements applicable to this source are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Flare Vapor Combustion Unit	Pilot Flame Presence	Daily	Present	Response Steps
			Not Present	

These monitoring conditions are necessary because the flare vapor combustion unit for the tank truck loading rack must operate properly to ensure compliance with 326 IAC 2-3 (Emission Offset) and 326 IAC 2-8-4 (FESOP).

### **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 application for the purposes of this review was received on August 7, 2006.

### **Conclusion**

The operation of this bulk gasoline terminal shall be subject to the conditions of the attached **FESOP Renewal No. F 063-23468-00004**.

**Appendix A: Emission Calculations  
Loading Rack Emissions - Gasoline**

**Company Name: Buckeye Terminals, LLC - Clermont Terminal  
Address City IN Zip: 10470 E 300 N, Clermont, Indiana 46234  
FESOP Renewal: F 063-23468-00004  
Reviewer: Michael A. Morrone/MES  
Date: August 13, 2007**

**Gasoline Loading**

LL = 12.46(S\*P\*M/T) - AP 42 Section 5.2

**Where:**

LL = Loading Loss, pounds per 1000 gallons (lb/10<sup>3</sup> gal) of liquid loaded  
S = Saturation factor (AP 42, Table 5.2-1) (0.6 for submerged loading)  
P = True vapor pressure of liquid loaded, pounds per square inch absolute (psia)  
M = Molecular weight of vapors, pounds per pound-mole (lb/lb-mole)  
T = Temperature of bulk liquid loaded °R (°F +460)

**For Gasoline:**

S = 0.600 (from AP 42, Table 5.2-1)  
P = 6.90 psia (at 60°F, -520°R) (from AP-42, Table 7.1-2)  
M = 62.0 lb/lbmol  
T = 520 °R  
LL = 6.15 lb/10<sup>3</sup> gal

**Total Gasoline Throughput**

Max Annual Throughput = 867,240,000 gals/yr gasoline

**Uncontrolled VOC Emissions**

LL	6.15	lb/10 <sup>3</sup> gal
Max Annual Throughput	867,240,000	gal/yr gasoline
Annual VOC Emissions	5333914	lbs/yr
Annual VOC Emissions	2667	tons/yr

**Controlled VOC Emissions\***

LL =	0.236	lb/10 <sup>3</sup> gal
Max Annual Throughput =	867,240,000	gals/yr gasoline
Annual VOC Emissions	204807	lbs/yr
Annual VOC Emissions	102	tons/yr

**Limited Throughput VOC Emissions**

LL =	6.15	lb/10 <sup>3</sup> gal
Max Annual Throughput =	709,813,559	gals/yr gasoline
Annual VOC Emissions	4365353	lbs/yr
Annual VOC Emissions	2183	tons/yr

**Controlled VOC Emissions after Throughput Limit\*\***

LL =	0.236	lb/10 <sup>3</sup> gal
Max Annual Throughput =	709,813,559	gals/yr gasoline
Annual VOC Emissions	167516	lbs/yr
Annual VOC Emissions	83.8	tons/yr

**METHODOLOGY**

Annual VOC Emissions (lbs/yr) = LL \* Max Annual Throughput  
Annual VOC Emissions (tons/yr) = Annual VOC Emissions (lbs/yr) /2000 lbs/ton  
\*Controlled LL factor based on a flare vapor combustion unit efficiency of 96.16%.

**Appendix A: Emission Calculations  
Loading Rack Emissions - No. 2 Fuel Oil**

**Company Name: Buckeye Terminals, LLC - Clermont Terminal  
Address City IN Zip: 10470 E 300 N, Clermont, Indiana 46234  
FESOP Renewal: F 063-23468-00004  
Reviewer: Michael A. Morrone/MES  
Date: August 13, 2007**

**No. 2 Fuel Oil Loading - Submerged Loading - Dedicated Normal Service**

LL = 12.46(S\*P\*M/T) - AP 42 Section 5.2

**Where:**

LL = Loading Loss, pounds per 1000 gallons (lb/10<sup>3</sup> gal) of liquid loaded  
S = Saturation factor (AP 42, Table 5.2-1) (0.6 for submerged loading)  
P = True vapor pressure of liquid loaded, pounds per square inch absolute (psia)  
M = Molecular weight of vapors, pounds per pound-mole (lb/lb-mole)  
T = Temperature of bulk liquid loaded °R (°F +460)

**For No.2 Fuel Oil:**

S = 0.600 (from AP 42, Table 5.2-1)  
P = 0.0065 psia (at 60°F, -520°R) (from AP-42, Table 7.1-2)  
M = 130.0 lb/lbmol  
T = 520 °R  
LL = 0.012 lb/10<sup>3</sup> gal

**Total No. 2 Fuel Oil Throughput**

Max Annual Throughput = 867,240,000 gals/yr No. 2 Fuel Oil

**Annual VOC Emissions (Truck Loading) (uncontrolled)**

LL	0.012	lb/10 <sup>3</sup> gal
Max Annual Throughput	867,240,000	gal/yr No. 2 Fuel Oil
Annual VOC Emissions	10536	lbs/yr
<b>Annual VOC Emissions</b>	<b>5.27</b>	<b>tons/yr</b>

**Controlled and Limited VOC Emissions\***

LL =	0.0005	lb/10 <sup>3</sup> gal
Max Annual Throughput =	709,813,559	gals/yr No. 2 fuel oil
Annual VOC Emissions	331	lbs/yr
<b>Annual VOC Emissions</b>	<b>0.166</b>	<b>tons/yr</b>

**METHODOLOGY**

Annual VOC Emissions (lbs/yr) = LL \* Max Annual Throughput  
Annual VOC Emissions (tons/yr) = Annual VOC Emissions (lbs/yr) /2000 lbs/ton  
\*Using a vapor combustion unit efficiency of 96.16%.

**Appendix A: Emission Calculations  
Loading Rack Emissions - Ethyl Alcohol**

**Company Name: Buckeye Terminals, LLC - Clermont Terminal  
Address City IN Zip: 10470 E 300 N, Clermont, Indiana 46234  
FESOP Renewal: F 063-23468-00004  
Reviewer: Michael A. Morrone/MES  
Date: August 13, 2007**

**Ethyl Alcohol Loading - Submerged Loading - Dedicated Normal Service**

LL = 12.46(S\*P\*M/T) - AP 42 Section 5.2

**Where:**

LL = Loading Loss, pounds per 1000 gallons (lb/10<sup>3</sup> gal) of liquid loaded  
S = Saturation factor (AP 42, Table 5.2-1) (0.6 for submerged loading)  
P = True vapor pressure of liquid loaded, pounds per square inch absolute (psia)  
M = Molecular weight of vapors, pounds per pound-mole (lb/lb-mole)  
T = Temperature of bulk liquid loaded °R (°F +460)

**For Ethyl Alcohol:**

S = 0.600 (from AP 42, Table 5.2-1)  
P = 0.6190 psia (at 60°F, -520°R) (from AP-42, Table 7.1-2)  
M = 130.0 lb/lbmol  
T = 520 °R  
LL = 1.157 lb/10<sup>3</sup> gal

**Total Ethyl Alcohol Throughput**

Max Annual Throughput = 867,240,000 gals/yr No. 2 Fuel Oil

**Annual VOC Emissions (Truck Loading) (uncontrolled)**

LL	1.157	lb/10 <sup>3</sup> gal
Max Annual Throughput	867,240,000	gal/yr Ethyl Alcohol
Annual VOC Emissions	1003319	lbs/yr
<b>Annual VOC Emissions</b>	<b>502</b>	<b>tons/yr</b>

**Controlled and Limited VOC Emissions\***

LL =	0.050557011	lb/10 <sup>3</sup> gal
Max Annual Throughput =	709,813,559	gals/yr Ethyl Alcohol
Annual VOC Emissions	35886	lbs/yr
<b>Annual VOC Emissions</b>	<b>17.9</b>	<b>tons/yr</b>

**METHODOLOGY**

Annual VOC Emissions (lbs/yr) = LL \* Max Annual Throughput  
Annual VOC Emissions (tons/yr) = Annual VOC Emissions (lbs/yr) /2000 lbs/ton  
\*Using a vapor combustion unit control efficiency of 96.16%.

**Appendix A: Emissions Calculations  
Process Fugitive Emissions**

**Company Name:** Buckeye Terminals, LLC - Clermont Terminal  
**Address City IN Zip:** 10470 E 300 N, Clermont, Indiana 46234  
**FESOP Renewal:** F 063-23468-00004  
**Reviewer:** Michael A. Morrone/MES  
**Date:** August 13, 2007

Component Type	Service	Emission Factor (lbs/hr-component)	Quantity	VOC Emissions (lbs/hr)	VOC Emissions (tons/yr)
Flange/screwed Connections	Gas	0.0001	86	0.008	0.035
Valves	Gas	0.0001	190	0.017	0.073
Pump seals	Gas	0.0001	13	0.0011	0.005
Others	Gas	0.0001	60	0.005	0.023
			<b>Total</b>	<b>0.026</b>	<b>0.136</b>

Component Type	Service	Weight % Benzene	Weight % Toluene	Weight % Xylene	Weight % Ethylbenzene	Weight % n-Hexane	Weight % 2,2,4 Trimethylpentane	Weight % MTBE	Weight % Cumene	Weight % Napthalene	Benzene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Xylene Emissions (tons/yr)	Ethylbenzene Emissions (tons/yr)	Hexane Emissions (tons/yr)	2,2,4 Trimethylpentane Emissions (tons/yr)	MTBE Emissions (tons/yr)	Cumene Emissions (tons/yr)	Napthalene Emissions (tons/yr)	Total HAPs Emissions (tons/yr)
Flange/screwed Connections	Gas	0.337%	0.01%	0.500%	0.032%	0.596%	0.676%	2.24%	0.002%	0.0002%	0.0001	0.000002	0.0002	0.00001	0.0002	0.0002	0.001	0.000001	0.0000001	0.002
Valves	Gas	0.337%	0.01%	0.500%	0.032%	0.596%	0.676%	2.24%	0.002%	0.0002%	0.0002	0.00001	0.0004	0.00002	0.0004	0.0005	0.002	0.000001	0.0000001	0.003
Pump seals	Gas	0.337%	0.01%	0.500%	0.032%	0.596%	0.676%	2.24%	0.002%	0.0002%	0.00002	0.0000004	0.00003	0.000002	0.00003	0.00003	0.0001	0.0000001	0.0000001	0.0002
Others	Gas	0.337%	0.01%	0.500%	0.032%	0.596%	0.676%	2.24%	0.002%	0.0002%	0.0001	0.000002	0.0001	0.00001	0.0001	0.0002	0.001	0.0000005	0.00000005	0.001
							<b>Total</b>				<b>0.0005</b>	<b>0.00001</b>	<b>0.001</b>	<b>0.00004</b>	<b>0.001</b>	<b>0.001</b>	<b>0.003</b>	<b>0.000003</b>	<b>0.0000003</b>	<b>0.005</b>

**METHODOLOGY**

Emission Factors from AP-42, Chapter 5- Related Emission Factor Documents - Protocol for Equipment Leak Emission Estimates - Table 2-3  
VOC emissions (lbs/hr) = Emission Factor X Quantity  
VOC Emissions (tons/yr) = VOC Emissions (lbs/hr) X (8760 hrs/yr/2000 lbs/ton)  
HAP Emissions (tons/yr) = VOC Emissions (tons/yr) X Weight % HAP  
Assumed worst case service (gasoline for entire source).

**Appendix A: Emissions Calculations  
Tank VOC Emissions - Potential to Emit**

**Company Name: Buckeye Terminals, LLC - Clermont Terminal  
Address City IN Zip: 10470 E 300 N, Clermont, Indiana 46234  
FESOP Renewal: F 063-23468-00004  
Reviewer: Michael A. Morrone/MES  
Date: August 13, 2007**

Tank Number	Product Stored	Losses (Tons per Year)							Total Potential to Emit VOC (tons/yr)
		Standing	Breathing	Working	Withdrawal	Rim Seal	Deck Fitting	Deck Seam	
#1	No. 2 fuel oil	0.00	0.075	0.153	0.00	0.00	0.00	0.00	0.228
#2	No. 2 fuel oil	0.000	0.075	0.097	0.00	0.00	0.00	0.00	0.172
#3	Gasoline (RVP 13)	2.04	0.00	0.00	0.025	0.480	1.56	0.000	2.07
#4	Gasoline (RVP 13)	2.04	0.00	0.00	0.021	0.480	1.56	0.00	2.06
#5	Gasoline (RVP 13)	4.22	0.00	0.00	0.021	0.788	3.43	0.00	4.24
#6	Gasoline (RVP 13)	4.22	0.00	0.00	0.036	0.788	3.43	0.00	4.25
#7	Ethyl Alcohol	0.00	0.106	0.566	0.000	0.000	0.000	0.00	0.671
#8	No. 2 fuel oil	0.00	0.002	0.010	0.000	0.000	0.000	0.00	0.012
#9	No. 2 fuel oil	0.00	0.002	0.010	0.000	0.000	0.000	0.00	0.012
#10	No. 2 fuel oil	0.00	0.002	0.010	0.000	0.00	0.000	0.00	0.012
#11	No. 2 fuel oil	0.00	0.001	0.0002	0.000	0.000	0.000	0.00	0.001
<b>TOTALS</b>		<b>12.5</b>	<b>0.26</b>	<b>0.85</b>	<b>0.10</b>	<b>2.54</b>	<b>9.98</b>	<b>0.000</b>	<b>13.7</b>

**METHODOLOGY**

IDEM, OAQ has calculated all storage tanks emissions using USEPA's TANKs 4.09d software program and all emissions are based on the estimated maximum annual throughput for each tank.

**Appendix A: Emissions Calculations  
Tank or Loading Rack HAP  
Emissions - Potential to Emit**

**Company Name: Buckeye Terminals, LLC - Clermont Terminal  
Address City IN Zip: 10470 E 300 N, Clermont, Indiana 46234  
FESOP Renewal: F 063-23468-00004  
Reviewer: Michael A. Morrone/MES  
Date: August 13, 2007**

Tank Number or Loading Rack	Product Stored	VOC Emissions (tons/yr)	Weight % Benzene	Weight % Toluene	Weight % Ethylbenzene	Weight % Xylene	Weight % 2,2,4 Trimethylpentane	Weight % n-Hexane	Weight % MTBE	Weight % Cumene	Weight % Naphthalene	Benzene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Ethylbenzene Emissions (tons/yr)	Xylene Emissions (tons/yr)	2,2,4 Trimethylpentane Emissions (tons/yr)	n-Hexane Emissions (tons/yr)	MTBE Emissions (tons/yr)	Cumene Emissions (tons/yr)	Naphthalene Emissions (tons/yr)	Total HAPs (tons/yr)
#1	No. 2 fuel oil	0.228	0.140%	1.52%	0.170%	1.000%	0.00%	0.030%	0.00%	0.080%	0.030%	0.0003	0.003	0.0004	0.002	0.00	0.0001	0.00	0.0002	0.0001	0.007
#2	No. 2 fuel oil	0.172	0.140%	1.52%	0.170%	1.000%	0.00%	0.030%	0.00%	0.080%	0.030%	0.0002	0.003	0.0003	0.002	0.00	0.0001	0.00	0.0001	0.0001	0.005
#3	Gasoline (RVP 13)	2.07	0.337%	0.007%	0.032%	0.222%	0.676%	0.596%	2.24%	0.002%	0.0002%	0.007	0.0001	0.001	0.005	0.014	0.012	0.046	0.00004	0.000004	0.085
#4	Gasoline (RVP 13)	2.06	0.337%	0.007%	0.032%	0.222%	0.676%	0.596%	2.24%	0.002%	0.0002%	0.007	0.0001	0.001	0.005	0.014	0.012	0.046	0.00004	0.000004	0.085
#5	Gasoline (RVP 13)	4.24	0.337%	0.007%	0.032%	0.222%	0.676%	0.596%	2.24%	0.002%	0.0002%	0.014	0.0003	0.001	0.009	0.029	0.025	0.095	0.0001	0.00001	0.174
#6	Gasoline (RVP 13)	4.25	0.337%	0.007%	0.032%	0.222%	0.676%	0.596%	2.24%	0.002%	0.0002%	0.014	0.0003	0.001	0.009	0.029	0.025	0.095	0.0001	0.00001	0.175
#7	Ethyl Alcohol	0.671	0.999%	4.00%	0.900%	4.00%	0.00%	0.999%	0.00%	0.002%	0.0002%	0.007	0.027	0.006	0.027	0.00	0.007	0.000	0.00001	0.000001	0.073
#8	No. 2 fuel oil	0.012	0.140%	1.52%	0.170%	1.00%	0.00%	0.030%	0.00%	0.080%	0.030%	0.00002	0.0002	0.00002	0.0001	0.00	0.000004	0.000	0.00001	0.000004	0.0004
#9	No. 2 fuel oil	0.012	0.140%	1.52%	0.170%	1.00%	0.00%	0.030%	0.00%	0.080%	0.030%	0.00002	0.0002	0.00002	0.0001	0.00	0.000004	0.000	0.00001	0.000004	0.0004
#10	No. 2 fuel oil	0.012	0.140%	1.52%	0.170%	1.00%	0.00%	0.030%	0.00%	0.080%	0.030%	0.00002	0.0002	0.00002	0.0001	0.00	0.000004	0.000	0.00001	0.000004	0.0004
#11	No. 2 fuel oil	0.001	0.140%	1.52%	0.170%	1.00%	0.00%	0.030%	0.00%	0.080%	0.030%	0.000001	0.00001	0.000001	0.00001	0.00	0.0000003	0.000	0.000001	0.0000003	0.00002
Tank Truck Loading	Gasoline (RVP 13)	2667	0.337%	0.007%	0.032%	0.222%	0.676%	0.596%	2.24%	0.002%	0.0002%	8.99	0.187	0.853	5.92	18.0	15.9	59.7	0.053	0.0053	110
Tank Truck Loading	No. 2 fuel oil	5.27	0.140%	1.520%	0.170%	1.000%	0.000%	0.030%	0.000%	0.080%	0.030%	0.007	0.080	0.009	0.053	0.00	0.002	0.00	0.004	0.002	0.156
Tank Truck Loading	Ethyl Alcohol	502	0.999%	3.999%	0.900%	3.999%	0.000%	0.999%	0.000%	0.002%	0.000%	5.01	20.1	4.51	20.1	0.00	5.01	0.00	0.010	0.0010	54.7
	<b>Worst Case Loading Rack</b>	<b>2667</b>									<b>Worst Case Loading Rack</b>	<b>8.99</b>	<b>20.1</b>	<b>4.51</b>	<b>20.1</b>	<b>18.0</b>	<b>15.9</b>	<b>59.7</b>	<b>0.053</b>	<b>0.005</b>	<b>147</b>
	<b>TOTALS</b>	<b>2681</b>									<b>TOTALS</b>	<b>9.04</b>	<b>20.1</b>	<b>4.53</b>	<b>20.1</b>	<b>18.1</b>	<b>16.0</b>	<b>60.0</b>	<b>0.054</b>	<b>0.005</b>	<b>148</b>

**Appendix A: Emissions Calculations  
Summary**

**Company Name: Buckeye Terminals, LLC - Clermont Terminal  
Address City IN Zip: 10470 E 300 N, Clermont, Indiana 46234  
FESOP Renewal: F 063-23468-00004  
Reviewer: Michael A. Morrone/MES  
Date: August 13, 2007**

**Summary of Emissions**

**Uncontrolled Potential Emissions**

Significant Emission Units	PM	PM-10	SO2	NOx	VOC	CO	Benzene	Toluene	Ethylbenzene	Xylene	2,2,4 Trimethylpentane	n-Hexane	MTBE	Cumene	Napthalene	Total HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)								
Truck Tank Rack Loading	0.00	0.00	0.00	0.00	2681	0.00	9.04	20.1	4.53	20.1	18.1	16.0	60.0	0.054	0.005	148
Tank #1	0.00	0.00	0.00	0.00	0.228	0.00	0.0003	0.003	0.0004	0.002	0.00	0.0001	0.00	0.0002	0.0001	0.007
Tank #2	0.00	0.00	0.00	0.00	0.172	0.00	0.0002	0.003	0.0003	0.002	0.00	0.0001	0.00	0.0001	0.0001	0.005
Tank #3	0.00	0.00	0.00	0.00	2.07	0.00	0.007	0.0001	0.001	0.005	0.014	0.012	0.046	0.00004	0.000004	0.085
Tank #4	0.00	0.00	0.00	0.00	2.06	0.00	0.007	0.0001	0.001	0.005	0.014	0.012	0.046	0.00004	0.000004	0.085
Tank #5	0.00	0.00	0.00	0.00	4.24	0.00	0.014	0.0003	0.001	0.009	0.029	0.025	0.095	0.0001	0.00001	0.174
Tank #6	0.00	0.00	0.00	0.00	4.25	0.00	0.014	0.0003	0.001	0.009	0.029	0.025	0.095	0.0001	0.00001	0.175
Tank #7	0.00	0.00	0.00	0.00	0.671	0.00	0.007	0.027	0.006	0.027	0.00	0.007	0.00	0.00001	0.000001	0.073
Tank #8	0.00	0.00	0.00	0.00	0.012	0.00	0.00002	0.0002	0.00002	0.0001	0.00	0.000004	0.00	0.00001	0.000004	0.0004
Tank #9	0.00	0.00	0.00	0.00	0.012	0.00	0.00002	0.0002	0.00002	0.0001	0.00	0.000004	0.00	0.00001	0.000004	0.0004
Tank #10	0.00	0.00	0.00	0.00	0.012	0.00	0.00002	0.0002	0.00002	0.0001	0.00	0.000004	0.00	0.00001	0.000004	0.0004
Tank #11	0.00	0.00	0.00	0.00	0.001	0.00	0.000001	0.00001	0.000001	0.00001	0.00	0.0000003	0.00	0.000001	0.0000003	0.00002
Fugitive Emissions	0.00	0.00	0.00	0.00	0.136	0.00	0.0005	0.00001	0.001	0.00004	0.0008	0.001	0.003	0.000003	0.0000003	0.005
Insignificant Activities	5.00	5.00	0.00	0.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.00
<b>Total</b>	<b>5.00</b>	<b>5.00</b>	<b>0.00</b>	<b>0.00</b>	<b>2696</b>	<b>0.00</b>	<b>9.09</b>	<b>20.1</b>	<b>4.54</b>	<b>20.2</b>	<b>18.2</b>	<b>16.1</b>	<b>60.3</b>	<b>0.055</b>	<b>0.006</b>	<b>150</b>

**Controlled Potential Emissions**

Significant Emission Units	PM	PM-10	SO2	NOx	VOC	CO	Benzene	Toluene	Ethylbenzene	Xylene	2,2,4 Trimethylpentane	n-Hexane	MTBE	Cumene	Napthalene	Total HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Truck Tank Rack Loading	0.00	0.00	0.00	0.00	102.4	0.00	0.289	0.643	0.145	0.644	0.580	0.511	1.92	0.002	0.0002	4.73
Tank #1	0.00	0.00	0.00	0.00	0.228	0.00	0.0003	0.003	0.0004	0.002	0.000	0.0001	0.000	0.0002	0.0001	0.007
Tank #2	0.00	0.00	0.00	0.00	0.172	0.00	0.0002	0.003	0.0003	0.002	0.000	0.0001	0.000	0.0001	0.0001	0.005
Tank #3	0.00	0.00	0.00	0.00	2.07	0.00	0.007	0.0001	0.001	0.005	0.014	0.012	0.046	0.00004	0.000004	0.085
Tank #4	0.00	0.00	0.00	0.00	2.06	0.00	0.007	0.0001	0.001	0.005	0.014	0.012	0.046	0.00004	0.000004	0.085
Tank #5	0.00	0.00	0.00	0.00	4.24	0.00	0.014	0.0003	0.001	0.009	0.029	0.025	0.095	0.0001	0.00001	0.174
Tank #6	0.00	0.00	0.00	0.00	4.25	0.00	0.014	0.0003	0.001	0.009	0.029	0.025	0.095	0.0001	0.00001	0.175
Tank #7	0.00	0.00	0.00	0.00	0.671	0.00	0.007	0.027	0.006	0.0268	0.00	0.007	0.00	0.00001	0.000001	0.073
Tank #8	0.00	0.00	0.00	0.00	0.012	0.00	0.00002	0.0002	0.00002	0.0001	0.00	0.000004	0.00	0.00001	0.000004	0.0004
Tank #9	0.00	0.00	0.00	0.00	0.012	0.00	0.00002	0.0002	0.00002	0.0001	0.00	0.000004	0.00	0.00001	0.000004	0.0004
Tank #10	0.00	0.00	0.00	0.00	0.012	0.00	0.00002	0.0002	0.00002	0.0001	0.00	0.000004	0.00	0.00001	0.000004	0.0004
Tank #11	0.00	0.00	0.00	0.00	0.001	0.00	0.000001	0.00001	0.000001	0.00001	0.00	0.0000003	0.00	0.000001	0.0000003	0.00002
Fugitive Emissions	0.00	0.00	0.00	0.00	0.136	0.00	0.0005	0.00001	0.001	0.00004	0.001	0.001	0.003	0.000003	0.0000003	0.005
Insignificant Activities	5.00	5.00	0.00	0.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.00
<b>Total</b>	<b>5.00</b>	<b>5.00</b>	<b>0.00</b>	<b>0.00</b>	<b>117</b>	<b>0.00</b>	<b>0.340</b>	<b>0.677</b>	<b>0.156</b>	<b>0.703</b>	<b>0.666</b>	<b>0.594</b>	<b>2.21</b>	<b>0.002</b>	<b>0.0003</b>	<b>6.35</b>

Company Name: Buckeye Terminals, LLC - Clermont Terminal  
 Address City IN Zip: 10470 E 300 N, Clermont, Indiana 46234  
 FESOP Renewal: F 063-23468-00004  
 Reviewer: Michael A. Morrone/MES  
 Date: August 13, 2007

Limited and Controlled Potential Emissions

Significant Emission Units	PM	PM-10	SO2	NOx	VOC	CO	Benzene	Toluene	Ethylbenzene	Xylene	2,2,4 Trimethylpentane	n-Hexane	MTBE	Cumene	Napthalene	Total HAPs	
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	
Truck Tank Rack Loading	0.00	0.00	0.00	0.00	83.8	0.00	Less than 1.55										Less than 4.28
Tank #1	0.00	0.00	0.00	0.00	0.228	0.00	0.0003	0.003	0.0004	0.002	0.00	0.0001	0.00	0.0002	0.0001	0.007	
Tank #2	0.00	0.00	0.00	0.00	0.172	0.00	0.0002	0.003	0.0003	0.002	0.00	0.0001	0.00	0.0001	0.0001	0.005	
Tank #3	0.00	0.00	0.00	0.00	2.07	0.00	0.007	0.0001	0.001	0.005	0.014	0.012	0.046	0.00004	0.000004	0.085	
Tank #4	0.00	0.00	0.00	0.00	2.06	0.00	0.007	0.0001	0.001	0.005	0.014	0.012	0.046	0.00004	0.000004	0.085	
Tank #5	0.00	0.00	0.00	0.00	4.24	0.00	0.014	0.0003	0.001	0.009	0.029	0.025	0.095	0.0001	0.00001	0.174	
Tank #6	0.00	0.00	0.00	0.00	4.25	0.00	0.014	0.0003	0.001	0.009	0.029	0.025	0.095	0.0001	0.00001	0.175	
Tank #7	0.00	0.00	0.00	0.00	0.671	0.00	0.007	0.027	0.006	0.027	0.00	0.007	0.00	0.00001	0.000001	0.073	
Tank #8	0.00	0.00	0.00	0.00	0.012	0.00	0.00002	0.0002	0.00002	0.0001	0.00	0.000004	0.00	0.00001	0.000004	0.004	
Tank #9	0.00	0.00	0.00	0.00	0.012	0.00	0.00002	0.0002	0.00002	0.0001	0.00	0.000004	0.00	0.00001	0.000004	0.004	
Tank #10	0.00	0.00	0.00	0.00	0.012	0.00	0.00002	0.0002	0.00002	0.0001	0.00	0.000004	0.00	0.00001	0.000004	0.004	
Tank #11	0.00	0.00	0.00	0.00	0.001	0.00	0.000001	0.00001	0.000001	0.00001	0.00	0.0000003	0.00	0.000001	0.0000003	0.00002	
Insignificant Activities	5.00	5.00	0.00	0.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.00	
<b>Total</b>	<b>5.00</b>	<b>5.00</b>	<b>0.00</b>	<b>0.00</b>	<b>Less than 100</b>	<b>0.00</b>	<b>Less than 10.0</b>										<b>Less than 25.0</b>

Please note that the emissions of each HAP have been proportionally reduced in accordance with the VOC limit (which takes into account the worst gase VOC emissions for gasoline). Since this source is not one of the twenty-eight listed source categories, fugitive emissions are not counted towards Part 70 or Emission Offset applicabilities.