



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant

DATE: June 16, 2008

RE: BP Products North America / 141-25535-00016

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Federally Enforceable State Operating Permit (FESOP) Renewal OFFICE OF AIR QUALITY

**BP Products North America - Granger Terminal
12694 Adams Road
Granger, Indiana 46530**

(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.

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.

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.

Operation Permit No.: F 141-25535-00016	
Issued by: Original signed by Tripurari P. Sinha, PhD, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 16, 2008 Expiration Date: June 16, 2018

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary bulk petroleum storage and transfer terminal.

Source Address:	12694 Adams Road, Granger, Indiana 46530
Mailing Address:	PO Box 70, Granger, Indiana 46530
General Source Phone Number:	(574) 272-2800
SIC Code:	5171
County Location:	St. Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD 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) petroleum distillates vertical fixed roof storage tank, identified as Tank 1, constructed in 1953, with a nominal storage capacity of 1,722,000 gallons, and exhausting at emission point S1.
- (b) One (1) petroleum distillates vertical fixed roof storage tank, identified as Tank 3, constructed in 1953, with a nominal storage capacity of 2,179,800 gallons, and exhausting at emission point S3.
- (c) One (1) petroleum distillates vertical fixed roof storage tank, identified as Tank 6, constructed in 1960, with a nominal storage capacity of 613,200 gallons, and exhausting at emission point S5.
- (d) One (1) petroleum product (gasoline) external floating roof with dome storage tank, identified as Tank 2, constructed in 1953, with a nominal storage capacity of 2,646,000 gallons, and exhausting at emission point S2.
- (e) One (1) petroleum product (gasoline) external floating roof with dome storage tank, identified as Tank 4, constructed in 1953, with a nominal storage capacity of 1,705,200 gallons, and exhausting at emission point S4.
- (f) One (1) petroleum product (gasoline) external floating roof with dome storage tank, identified as Tank 7, constructed in 1970, with a nominal storage capacity of 1,680,000 gallons, and exhausting at emission point S6.
- (g) One (1) horizontal fixed roof slop storage tank, identified as Tank T-10, constructed in 1980, with a maximum storage capacity of 6,000 gallons.
- (h) One (1) horizontal fixed roof diesel additive tank, identified as Tank T-20, constructed in

1997, with a maximum storage capacity of 6,000 gallons.

- (i) One (1) bottom loading two (2) bay tank truck loading rack, identified as Loading Rack, constructed in 1995, with a maximum throughput capacity of 65,890 gallons of petroleum product (gasoline) and/or petroleum distillates per hour, with the capability of loading petroleum product (gasoline) and/or petroleum distillates concurrently, using a carbon adsorption gasoline vapor recovery unit, identified as EU VRU, as control, and exhausting to stack V8.
- (j) One (1) soil vapor extraction system, identified as North System, constructed in 1993, with a gas flow rate of 2,000 actual cubic feet per minute (acfm), using a recuperative catalytic incineration system as control.
- (k) Two (2) ground water remediation air stripping systems, constructed in 1970, each with a maximum capacity of 950 gallons per minute with a gas flow rate of 7,200 actual cubic feet per minute (acfm), and exhausting to stacks S/V 001A and S/V 001B, respectively.

Note: Vertical fixed roof storage tanks (Tank 1, 3, and 6) store refined petroleum distillates, refined petroleum products with a vapor pressure less than that of refined petroleum distillates, or ethanol. Domed external floating roof storage tanks (Tank 2, 4, and 7) store refined petroleum gasoline, refined petroleum products with a vapor pressure less than that of refined petroleum gasoline, or ethanol.

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

This stationary source also includes the following insignificant activities:

- (a) Storage tanks with a capacity less than or equal to one thousand (1,000) gallons and annual throughputs less than or equal to twelve thousand (12,000) gallons. [326 IAC 2-7-1(21)(G)(iii)(AA)]
 - (1) One (1) box style ethanol additive storage tank, identified as Tank 9, with a maximum storage capacity of 350 gallons, constructed in 1996.
 - (2) One (1) box style diesel additive storage tank, identified as Tank 90, with a maximum storage capacity of 550 gallons, constructed in 1996.
 - (3) Two (2) horizontal fixed roof well recovery storage tanks, identified as Tank T-11 and Tank T-21, each with a maximum storage capacity of 1,000 gallons, constructed in 1990.
 - (4) One (1) red dye additive storage tank, identified as Tank 19, with a maximum storage capacity of 350 gallons, constructed in 1996.
 - (5) One (1) horizontal fixed roof used motor oil storage tank, identified as Tank T-13, with a maximum storage capacity of 1,000 gallons, constructed in 1991.
 - (6) One (1) horizontal diesel additive storage tank, identified as Tank 22, with a maximum storage capacity of 500 gallons, constructed in 2004.
 - (7) One (1) tote diesel additive storage tank, identified as Tank 93, with a maximum storage capacity of 500 gallons, constructed in 2006.
 - (8) One (1) tote yellow dye (gasoline additive) storage tank, identified as Tank T-92, with a maximum storage capacity of 350 gallons, constructed in 2005.
- (b) Emission units whose potential uncontrolled emission of volatile organic compounds (VOCs) are less than three (3) pounds per hour or fifteen (15) pounds per day. [326 IAC

2-7-1(21)(A)(iv)]

- (1) One (1) horizontal fixed roof gasoline detergent additive storage tank, identified as Tank T-8, with a maximum storage capacity of 3,000 gallons, constructed in 1986.
 - (2) One (1) well recovery storage tank, identified as Tank T-12, with a maximum storage capacity of 5,250 gallons, constructed in 1996.
 - (3) Three (3) horizontal fixed roof remediation recovery storage tanks, identified as Tank T-14, Tank T-15, and Tank T-16, each with a maximum storage capacity of 8,000 gallons, constructed in 1986.
 - (4) Two (2) storm water storage tanks, identified as Tank T-17 and Tank T-18, each with a maximum storage capacity of 12,000 gallons, constructed in 1990.
 - (5) One (1) horizontal lubricity additive (diesel additive) storage tank, identified as Tank T-94, with a maximum storage capacity of 6,000 gallons, constructed in 2005.
- (c) One (1) ground water recovery system consisting of twenty-one (21) recovery wells. [326 IAC 2-7-1(21)(G)(vii)(BB)]
- (d) One (1) natural gas-fired and/or propane-fired recuperative catalytic incineration system, used as control for the solid vapor extraction system, rated at 1.00 MMBtu/hr, constructed in 1993. [326 IAC 2-7-1(21)(G)(i)(AA)(aa) and (bb)]
- (e) One (1) oil/water separator.
- (f) Maintenance activities.
- (g) Fugitive VOC emissions from pumps, valves, flanges, etc.
- (h) Paved and unpaved roads and parking lots with public access. [326 IAC 2-7-1(21)(G)(xiii)]

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 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 141-25535-00016, is issued for a fixed term of ten (10) 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 April 15 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, and Northern Regional Office 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

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (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 141-25535-00016 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 modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by 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][IC 13-30-3-1]

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 Advanced Source Modification Approval [326 IAC 2-8-4(11)][326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.25 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 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (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 one hundred (100) 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 that the source's potential to emit does not exceed the above specified limits.

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

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue

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 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 Licensed 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 Licensed 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 Commissioner 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; and/or
 - (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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Storage Tanks and Loading Rack with Vapor Recovery Unit

- (a) One (1) petroleum distillates vertical fixed roof storage tank, identified as Tank 1, constructed in 1953, with a nominal storage capacity of 1,722,000 gallons, and exhausting at emission point S1.
- (b) One (1) petroleum distillates vertical fixed roof storage tank, identified as Tank 3, constructed in 1953, with a nominal storage capacity of 2,179,800 gallons, and exhausting at emission point S3.
- (c) One (1) petroleum distillates vertical fixed roof storage tank, identified as Tank 6, constructed in 1960, with a nominal storage capacity of 613,200 gallons, and exhausting at emission point S5.
- (d) One (1) petroleum product (gasoline) external floating roof with dome storage tank, identified as Tank 2, constructed in 1953, with a nominal storage capacity of 2,646,000 gallons, and exhausting at emission point S2.
- (e) One (1) petroleum product (gasoline) external floating roof with dome storage tank, identified as Tank 4, constructed in 1953, with a nominal storage capacity of 1,705,200 gallons, and exhausting at emission point S4.
- (f) One (1) petroleum product (gasoline) external floating roof with dome storage tank, identified as Tank 7, constructed in 1970, with a nominal storage capacity of 1,680,000 gallons, and exhausting at emission point S6.
- (g) One (1) horizontal fixed roof slop storage tank, identified as Tank T-10, constructed in 1980, with a maximum storage capacity of 6,000 gallons.
- (h) One (1) horizontal fixed roof diesel additive tank, identified as Tank T-20, constructed in 1997, with a maximum storage capacity of 6,000 gallons.
- (i) One (1) bottom loading two (2) bay tank truck loading rack, identified as Loading Rack, constructed in 1995, with a maximum throughput capacity of 65,890 gallons of petroleum product (gasoline) and/or petroleum distillates per hour, with the capability of loading petroleum product (gasoline) and/or petroleum distillates concurrently, using a carbon adsorption gasoline vapor recovery unit, identified as EU VRU, as control, and exhausting to stack V8.

Note: Vertical fixed roof storage tanks (Tank 1, 3, and 6) store refined petroleum distillates, refined petroleum products with a vapor pressure less than that of refined petroleum distillates, or ethanol. Domed external floating roof storage tanks (Tank 2, 4, and 7) store refined petroleum gasoline, refined petroleum products with a vapor pressure less than that of refined petroleum gasoline, or ethanol.

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

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

D.1.1 PSD and Part 70 Minor Limits [326 IAC 2-2][326 IAC 2-8-4(1)]

- (a) The throughput of petroleum product (gasoline) through the Loading Rack shall be less than 177,200,968 gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (b) The throughput of petroleum distillates through the Loading Rack shall be less than 400,000,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The uncontrolled VOC emissions, when loading petroleum product (gasoline) from the Loading Rack, shall not exceed 6.86 pounds per thousand gallons.
- (d) The VOC emissions, when loading petroleum distillates from the Loading Rack, shall not exceed 0.02 pounds per thousand gallons.
- (e) The minimum overall (capture and destruction) control efficiency of the vapor recovery unit (EU VRU) shall be at least ninety-five percent (95.71%) of the VOC emissions from the Loading Rack.

Compliance with the above limits and Conditions D.2.1 and D.3.1, combined with the potential to emit VOC and HAPs from all other emission units at this source, shall limit the source-wide potential to emit of VOC to less than one hundred (100) tons per twelve (12) consecutive month period, any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-3(b)]

Pursuant to 326 IAC 8-4-3(b), the source shall not permit the use of Tanks 2, 4 and 7 unless:

- (a) The facility has been retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with an equally effective alternative control which has been approved.
- (b) The facility is maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.
- (c) All openings, except stub drains, are equipped with covers, lids, or seals such that:
 - (1) the cover, lid, or seal is in the closed position at all times except when in actual use;
 - (2) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports; and
 - (3) rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-4-4]

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

- (a) The bulk gasoline terminal is equipped with a vapor control system, in good working order, in operation and consisting of one of the following:
 - (1) An adsorber or condensation system which processes and recovers vapors and gases from the equipment being controlled, releasing no more than 80 milligrams per liter (0.00067 pounds per thousand gallons) of VOC to the atmosphere.
 - (2) A vapor collection system which directs all vapors to a fuel gas system or

incinerator.

- (3) An approved control system, demonstrated to have control efficiency equivalent to or greater than (1) above.
- (b) Displaced vapors and gases are vented only to the vapor control system.
- (c) 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.
- (d) All loading and vapor lines are equipped with fittings which make vapor-tight connections and which will be closed upon disconnection.

If employees of the owner of the 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 rule.

Compliance with the VOC emission limit of 35 milligrams of total organic compounds per liter of petroleum product (gasoline) loaded (0.00029 pounds of total organic compounds per thousand gallons of petroleum product (gasoline) loaded), pursuant to 40 CFR 60.502, Subpart XX, shall ensure compliance with the VOC emission limit of 80 milligrams per liter (0.00067 pounds per thousand gallons) of petroleum product (gasoline) loaded.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-4-9]

Pursuant to 326 IAC 8-4-9:

- (a) The Permittee shall not allow a transport subject to this rule to be filled or emptied, unless the transport:
 - (1) is tested annually according to test procedures consistent with Appendix A of "Control of Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems", EPA-450/2-78-051, or equivalent procedures approved by the commissioner.
 - (2) sustains a pressure change of no more than 750 pascals (3 in. of H₂O) in 5 minutes when pressurized to a gauge pressure of 4,500 pascals (18 in. of H₂O) or evacuated to a gauge pressure of 1,500 pascals (6 in. of H₂O) during the testing required in subsection (a)(1).
 - (3) is repaired by the owner or operator of the transport and retested within 15 days of testing if it does not meet the criteria of subsection (a)(2).
 - (4) displays a sticker which shows the date that the gasoline tank truck last passed the test required in subsections (a)(1) and (a)(2). Such sticker shall be displayed near the Department of Transportation Certification Plate required by 49 CFR 178.340-10b.
- (b) The Permittee shall take all reasonable steps to ensure that transports loading at this facility comply with subsection (a) above; and shall, in all cases when its employees are present, to supervise or perform loading and be responsible for compliance with subsection (a)(4).
- (c) The Permittee shall design and operate the applicable system and the gasoline loading equipment in a manner that prevents:

- (1) the gauge pressure from exceeding 4,500 pascals (18 in. of H₂O) and the vacuum from exceeding 1,500 pascals (6 in. of H₂O) in the gasoline tank truck;
 - (2) a reading equal to or greater than 100% of the lower explosive limit (LEL, measured as propane) at 2.5 centimeters (0.98 inches) from all points on the perimeter of a potential leak source when measured by the method referenced in Appendix B of "Control of Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems", EPA 450/2-78-051, or an equivalent procedure approved by IDEM, during loading or unloading operations; and
 - (3) avoidable visible liquid leaks during loading or unloading operations.
- (d) The Permittee shall, within fifteen (15) days, repair and retest a vapor collection or control system that exceeds the limits in subsection (c).
 - (e) The Permittee shall allow IDEM, OAQ staff, at any time, to monitor a gasoline tank truck, vapor balance referenced, to confirm continuing compliance with subsection (a) or (b).
 - (f) The Permittee shall submit to the U.S. EPA as a SIP revision, any alternative test procedures in subsection (a)(1) or (c)(2) that IDEM, OAQ allows.

D.1.5 Preventative Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]

In order to comply with Condition D.1.1, the vapor recovery unit (EU VRU) shall be in operation and control emissions from the Loading Rack at all times the Loading Rack is in operation.

D.1.7 Testing Requirements [326 IAC 2-8-5(1)]

Before November 10, 2012 which corresponds to five (5) years since the latest valid stack test plus one hundred and eighty (180) days, the Permittee shall conduct a performance test to verify the minimum VOC control efficiency utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.1.8 Monthly Visible Checks for Liquid and Vapor Leaks

- (a) Monthly checks for liquid and vapor leaks shall be performed during normal daylight operations when the Loading Rack, the vapor collection system, and the vapor recovery unit (EU VRU) are in operation. A trained employee will record any visible liquid and vapor leaks and the date of such leaks.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a violation of this permit.
- (f) All checks for visible liquid leaks made to comply with this condition shall be conducted in accordance with 326 IAC 8-4-9.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be compiled monthly and shall be complete and sufficient to establish compliance with the usage limits and/or the VOC and HAP emission limits established in Condition D.1.1.
 - (1) The amount of total petroleum products (gasoline) and distillate throughput per month from storage tanks. Records shall include those documents as necessary to verify the type and amount of throughput. Examples may include, but are not limited to, shipping documents, bills of loading, purchase orders, pipeline schedules, throughput summaries, Material Safety Data Sheets, and/or other records that document volumes of the specific regulated material transferred.
 - (2) Total amounts of petroleum products (gasoline) and distillate throughput for 12 consecutive month periods from storage tanks.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records for the External Floating Roof Tanks 2, 4 and 7 in accordance with (1) through (3) below:
 - (1) the types of volatile petroleum liquids stored;
 - (2) the maximum true vapor pressure of the liquids stored; and
 - (3) the results of the inspections performed on the storage tanks.

Such records shall be maintained for a period of two (2) years and shall be made available to the commissioner upon written request.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of all certification testing and repairs. The records must identify the following:
 - (1) the gasoline tank truck, vapor collection system, or vapor control system;
 - (2) the date of the test or repair; and
 - (3) if applicable, the type of repair and the date of retest.

The records must be maintained in a legible, readily available condition for at least two

- (2) years after the date the testing or repair was completed.
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain records of monthly checks for liquid and vapor leaks of the Loading Rack and EU VRU stack exhaust.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 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).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Soil Vapor Extraction System

- (j) One (1) soil vapor extraction system, identified as North System, constructed in 1993, with a gas flow rate of 2,000 actual cubic feet per minute (acfm), using a recuperative catalytic incineration system as control.

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

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

D.2.1 PSD and Part 70 Minor Limits [326 IAC 2-2][326 IAC 2-8-4(1)]

The total daily influent to the one (1) soil vapor extraction system (North System) shall be limited to 2,000 actual cubic feet per minute. The minimum overall control efficiency of the recuperative catalytic incineration system shall be at least ninety-eight percent (98%) of the VOC emissions from the soil vapor extraction system (North System).

Compliance with the above limits and Conditions D.1.1 and D.3.1, combined with the potential to emit VOC and HAPs from all other emission units at this source, shall limit the source-wide potential to emit of VOC to less than one hundred (100) tons per twelve (12) consecutive month period, any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

D.2.2 Preventative Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.2.3 Recuperative Catalytic Incineration System

In order to comply with Condition D.2.1, the recuperative catalytic incineration system shall be in operation and control emissions from the soil vapor extraction system (North System) at all times the North System is in operation. When operating, the recuperative catalytic incineration system shall maintain a minimum 3 hour average catalyst inlet temperature of 600°F to maintain an overall control efficiency of not less than ninety-eight percent (98%) by weight of captured volatile organic compounds (VOC) in order to demonstrate compliance with Condition D.2.1. Compliance with this condition shall deem 326 IAC 2-8 satisfied.

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

D.2.4 Parametric Monitoring

A continuous monitoring system shall be calibrated, maintained, and operated on the recuperative catalytic incineration system for measuring the catalyst inlet temperature. For the purpose of this condition, continuous monitoring shall mean no less often than once per fifteen (15) minutes. The output from this monitoring system shall be recorded as the catalyst inlet temperature. The 3-hour average catalyst inlet temperature shall be determined once per fifteen (15) minutes either as an output of the data acquisition system or by other means. From the date of issuance of this permit until approved stack test results are available, the Permittee shall operate the recuperative catalytic incineration system at or above the 3-hour average catalyst

inlet temperature of 600 °F whenever the recuperative catalytic incineration system is in operation.

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

D.2.5 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain a record of the 3-hour average catalyst inlet temperatures.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Two (2) Air Strippers

- (k) Two (2) ground water remediation air stripping systems, constructed in 1970, each with a maximum capacity of 950 gallons per minute with a gas flow rate of 7,200 actual cubic feet per minute (acfm), and exhausting to stacks S/V 001A and S/V 001B, respectively.

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

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

D.3.1 PSD and Part 70 Minor Limits [326 IAC 2-2][326 IAC 2-8-4(1)]

The total daily influent to the two (2) air strippers shall be limited to 1,900 gallons per minute of water contaminated with a maximum concentration of petroleum hydrocarbons of 3082.3 $\mu\text{g/L}$ (0.026 lb/10³ gal) and a maximum concentration of 1,2-DCA of 20.6 $\mu\text{g/L}$ (0.00017 lb/10³ gal).

Compliance with the above limits and Conditions D.1.1 and D.3.1, combined with the potential to emit VOC and HAPs from all other emission units at this source, shall limit the source-wide potential to emit of VOC to less than one hundred (100) tons per twelve (12) consecutive month period, any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

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

D.3.2 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP emission limits established in Condition D.3.1.
- (1) Monthly throughput of petroleum hydrocarbon and 1,2 DCA contaminated water processed by the strippers and monthly data on the influent VOC concentration.
 - (2) Monthly throughput of contaminated storm water processed by the strippers and monthly data on the influent VOC concentration.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

NEW SOURCE PERFORMANCE STANDARDS (NSPS) FOR BULK GASOLINE TERMINALS [40 CFR Part 60, Subpart XX]

Emissions Unit Description: Loading Rack with Vapor Recovery Unit

- (i) One (1) bottom loading two (2) bay tank truck loading rack, identified as Loading Rack, constructed in 1995, with a maximum throughput capacity of 65,890 gallons of petroleum product (gasoline) and/or petroleum distillates per hour, with the capability of loading petroleum product (gasoline) and/or petroleum distillates concurrently, using a carbon adsorption gasoline vapor recovery unit, identified as EU VRU, as control, and exhausting to stack V8.

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

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

Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1 for the Loading Rack except as otherwise specified in 40 CFR Part 60, Subpart XX.

E.1.2 Standards of Performance for Bulk Gasoline Terminals NSPS [40 CFR Part 60, Subpart XX]

The Permittee which engages in Bulk Gasoline Terminals operations shall comply with the following provisions of 40 CFR Part 60, Subpart XX (included as Attachment A of this permit):

- (1) 40 CFR 60.500
- (2) 40 CFR 60.501
- (3) 40 CFR 60.502
- (4) 40 CFR 60.503
- (5) 40 CFR 60.505
- (6) 40 CFR 60.506

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

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

Source Name: BP Products North America - Granger Terminal
Source Address: 12694 Adams Road, Granger, Indiana 46530
Mailing Address: PO Box 70, Granger, Indiana 46530
FESOP Permit No.: F 141-25535-00016

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
MC 61-53 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: BP Products North America - Granger Terminal
Source Address: 12694 Adams Road, Granger, Indiana 46530
Mailing Address: PO Box 70, Granger, Indiana 46530
FESOP Permit No.: F 141-25535-00016

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">• 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• 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 |
|---|

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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: BP Products North America - Granger Terminal
 Source Address: 12694 Adams Road, Granger, Indiana 46530
 Mailing Address: PO Box 70, Granger, Indiana 46530
 FESOP Permit No.: F 141-25535-00016
 Facility: One (1) bottom loading two (2) bay tank truck loading rack (Loading Rack)
 Parameter: Petroleum Products (Gasoline) & Petroleum Distillates Throughputs
 Limit: Less than 177,200,968 gallons of Petroleum Products (Gasoline) and less than 400,000,000 gallons of Petroleum Distillates per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

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

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: BP Products North America - Granger Terminal
 Source Address: 12694 Adams Road, Granger, Indiana 46530
 Mailing Address: PO Box 70, Granger, Indiana 46530
 FESOP Permit No.: F 141-25535-00016

Months: _____ **to** _____ **Year:** _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

NEW SOURCE PERFORMANCE STANDARDS (NSPS)
FOR BULK GASOLINE TERMINALS [40 CFR Part 60, Subpart XX]

§ 60.500 *Applicability and designation of affected facility.*

(a) The affected facility to which the provisions of this subpart apply is the total of all the loading racks at a bulk gasoline terminal which deliver liquid product into gasoline tank trucks.

(b) Each facility under paragraph (a) of this section, the construction or modification of which is commenced after December 17, 1980, is subject to the provisions of this subpart.

(c) For purposes of this subpart, any replacement of components of an existing facility, described in paragraph (a) of this section, commenced before August 18, 1983 in order to comply with any emission standard adopted by a State or political subdivision thereof will not be considered a reconstruction under the provisions of 40 CFR 60.15.

Note: The intent of these standards is to minimize the emissions of VOC through the application of best demonstrated technologies (BDT). The numerical emission limits in this standard are expressed in terms of total organic compounds. This emission limit reflects the performance of BDT.

§ 60.501 *Definitions.*

The terms used in this subpart are defined in the Clean Air Act, in §60.2 of this part, or in this section as follows:

Bulk gasoline terminal means any gasoline facility which receives gasoline by pipeline, ship or barge, and has a gasoline throughput greater than 75,700 liters per day. Gasoline throughput shall be the maximum calculated design throughput as may be limited by compliance with an enforceable condition under Federal, State or local law and discoverable by the Administrator and any other person.

Continuous vapor processing system means a vapor processing system that treats total organic compounds vapors collected from gasoline tank trucks on a demand basis without intermediate accumulation in a vapor holder.

Existing vapor processing system means a vapor processing system [capable of achieving emissions to the atmosphere no greater than 80 milligrams of total organic compounds per liter of gasoline loaded], the construction or refurbishment of which was commenced before December 17, 1980, and which was not constructed or refurbished after that date.

Flare means a thermal oxidation system using an open (without enclosure) flame.

Gasoline means any petroleum distillate or petroleum distillate/alcohol blend having a Reid vapor pressure of 27.6 kilopascals or greater which is used as a fuel for internal combustion engines.

Gasoline tank truck means a delivery tank truck used at bulk gasoline terminals which is loading gasoline or which has loaded gasoline on the immediately previous load.

Intermittent vapor processing system means a vapor processing system that employs an intermediate vapor holder to accumulate total organic compounds vapors collected from gasoline tank trucks, and treats the accumulated vapors only during automatically controlled cycles.

Loading rack means the loading arms, pumps, meters, shutoff valves, relief valves, and other piping and valves necessary to fill delivery tank trucks.

Refurbishment means, with reference to a vapor processing system, replacement of components of, or addition of components to, the system within any 2-year period such that the fixed capital cost of the new components required for such component replacement or addition exceeds 50 percent of the cost of a comparable entirely new system.

Thermal oxidation system means a combustion device used to mix and ignite fuel, air pollutants, and air to provide a flame to heat and oxidize hazardous air pollutants. Auxiliary fuel may be used to heat air pollutants to combustion temperatures.

Total organic compounds means those compounds measured according to the procedures in §60.503.

Vapor collection system means any equipment used for containing total organic compounds vapors displaced during the loading of gasoline tank trucks.

Vapor processing system means all equipment used for recovering or oxidizing total organic compounds vapors displaced from the affected facility.

Vapor-tight gasoline tank truck means a gasoline tank truck which has demonstrated within the 12 preceding months that its product delivery tank will sustain a pressure change of not more than 750 pascals (75 mm of water) within 5 minutes after it is pressurized to 4,500 pascals (450 mm of water). This capability is to be demonstrated using the pressure test procedure specified in Method 27.

§ 60.502 Standard for Volatile Organic Compound (VOC) emissions from bulk gasoline terminals.

On and after the date on which §60.8(a) requires a performance test to be completed, the owner or operator of each bulk gasoline terminal containing an affected facility shall comply with the requirements of this section.

- (a) Each affected facility shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading.
- (b) The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded, except as noted in paragraph (c) of this section.
- (c) For each affected facility equipped with an existing vapor processing system, the emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 80 milligrams of total organic compounds per liter of gasoline loaded.
- (d) Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack.
- (e) Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:
 - (1) The owner or operator shall obtain the vapor tightness documentation described in §60.505(b) for each gasoline tank truck which is to be loaded at the affected facility.
 - (2) The owner or operator shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility.
 - (3)(i) The owner or operator shall cross-check each tank identification number obtained in paragraph (e)(2) of this section with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained:
 - (A) If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or
 - (B) If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually.

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

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

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

(6) Alternate procedures to those described in paragraphs (e)(1) through (5) of this section for limiting gasoline tank truck loadings may be used upon application to, and approval by, the Administrator.

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

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

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

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

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

§ 60.503 Test methods and procedures.

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

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

(c) The owner or operator shall determine compliance with the standards in §60.502 (b) and (c) as follows:

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

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

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

$$E = K \sum_{i=1}^n (V_{esi} C_{ei}) / (L 10^6)$$

where:

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

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

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

L=total volume of gasoline loaded, liters.

n=number of testing intervals.

i=emission testing interval of 5 minutes.

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

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

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

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

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

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

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

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

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

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

(e) The performance test requirements of paragraph (c) of this section do not apply to flares defined in §60.501 and meeting the requirements in §60.18(b) through (f). The owner or operator shall demonstrate that the flare and associated vapor collection system is in compliance with the requirements in §§60.18(b) through (f) and 60.503(a), (b), and (d).

(f) The owner or operator shall use alternative test methods and procedures in accordance with the alternative test method provisions in §60.8(b) for flares that do not meet the requirements in §60.18(b).

§ 60.504 [Reserved]

§ 60.505 Reporting and recordkeeping.

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

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

(1) Test title: Gasoline Delivery Tank Pressure Test—EPA Reference Method 27.

(2) Tank owner and address.

(3) Tank identification number.

(4) Testing location.

(5) Date of test.

(6) Tester name and signature.

(7) Witnessing inspector, if any: Name, signature, and affiliation.

(8) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs).

(c) A record of each monthly leak inspection required under §60.502(j) shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum, the following information:

(1) Date of inspection.

(2) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).

(3) Leak determination method.

(4) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).

(5) Inspector name and signature.

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

(e) As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in paragraphs (a), (c), and (d) of this section, an owner or operator may comply with the requirements in either paragraph (e)(1) or (2) of this section.

(1) An electronic copy of each record is instantly available at the terminal.

(i) The copy of each record in paragraph (e)(1) of this section is an exact duplicate image of the original paper record with certifying signatures.

(ii) The permitting authority is notified in writing that each terminal using this alternative is in compliance with paragraph (e)(1) of this section.

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

(i) The copy of each record in paragraph (e)(2) of this section is an exact duplicate image of the original paper record with certifying signatures.

(ii) The permitting authority is notified in writing that each terminal using this alternative is in compliance with paragraph (e)(2) of this section.

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

§ 60.506 Reconstruction.

For purposes of this subpart:

(a) The cost of the following frequently replaced components of the affected facility shall not be considered in calculating either the “fixed capital cost of the new components” or the “fixed capital costs that would be required to construct a comparable entirely new facility” under §60.15: pump seals, loading arm gaskets and swivels, coupler gaskets, overfill sensor couplers and cables, flexible vapor hoses, and grounding cables and connectors.

(b) Under §60.15, the “fixed capital cost of the new components” includes the fixed capital cost of all depreciable components (except components specified in §60.506(a)) which are or will be replaced pursuant to all continuous programs of component replacement which are commenced within any 2-year period following December 17, 1980. For purposes of this paragraph, “commenced” means that an owner or operator has undertaken a continuous program of component replacement or that an owner or operator has entered into a contractual obligation to undertake and complete, within a reasonable time, a continuous program of component replacement.

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

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

Source Background and Description

Source Name:	BP Products North America, Inc. - Granger Terminal
Source Location:	12694 Adams Road, Granger, Indiana 46530
County:	St. Joseph
SIC Code:	5171
Permit Renewal No.:	F 141-25535-00016
Permit Reviewer:	Joe Sachse

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from BP Products North America, Inc. - Granger Terminal relating to the operation of a stationary bulk petroleum storage and transfer terminal.

History

On November 14, 2007, BP Products North America, Inc. - Granger Terminal submitted an application to the OAQ requesting to renew its operating permit. BP Products North America, Inc. - Granger Terminal was issued a FESOP Renewal (F 141-16296-00016) on August 11, 2003.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) petroleum distillates vertical fixed roof storage tank, identified as Tank 1, constructed in 1953, with a nominal storage capacity of 1,722,000 gallons, and exhausting at emission point S1.
- (b) One (1) petroleum distillates vertical fixed roof storage tank, identified as Tank 3, constructed in 1953, with a nominal storage capacity of 2,179,800 gallons, and exhausting at emission point S3.
- (c) One (1) petroleum distillates vertical fixed roof storage tank, identified as Tank 6, constructed in 1960, with a nominal storage capacity of 613,200 gallons, and exhausting at emission point S5.
- (d) One (1) petroleum product (gasoline) external floating roof with dome storage tank, identified as Tank 2, constructed in 1953, with a nominal storage capacity of 2,646,000 gallons, and exhausting at emission point S2.
- (e) One (1) petroleum product (gasoline) external floating roof with dome storage tank, identified as Tank 4, constructed in 1953, with a nominal storage capacity of 1,705,200 gallons, and exhausting at emission point S4.
- (f) One (1) petroleum product (gasoline) external floating roof with dome storage tank, identified as Tank 7, constructed in 1970, with a nominal storage capacity of 1,680,000 gallons, and exhausting at emission point S6.
- (g) One (1) horizontal fixed roof slop storage tank, identified as Tank T-10, constructed in 1980, with a maximum storage capacity of 6,000 gallons.

- (h) One (1) horizontal fixed roof diesel additive tank, identified as Tank T-20, constructed in 1997, with a maximum storage capacity of 6,000 gallons.
- (i) One (1) bottom loading two (2) bay tank truck loading rack, identified as Loading Rack, constructed in 1995, with a maximum throughput capacity of 65,890 gallons of gasoline and/or distillates per hour, with the capability of loading gasoline and/or distillates concurrently, using a carbon adsorption gasoline vapor recovery unit, identified as EU VRU, as control, and exhausting to stack V8.
- (j) One (1) soil vapor extraction system, identified as North System, constructed in 1993, with a gas flow rate of 2,000 actual cubic feet per minute (acfm), using a recuperative catalytic incineration system as control.
- (k) Two (2) ground water remediation air stripping systems, constructed in 1970, each with a maximum capacity of 950 gallons per minute with a gas flow rate of 7,200 actual cubic feet per minute (acfm), and exhausting to stacks S/V 001A and S/V 001B, respectively.

Note: Vertical fixed roof storage tanks (Tank 1, Tank 3, and Tank 6) store refined petroleum distillates, refined petroleum products with a vapor pressure less than that of refined petroleum distillates, or ethanol. Domed external floating roof storage tanks (Tank 2, Tank 4, and Tank 7) store refined petroleum gasoline, refined petroleum products with a vapor pressure less than that of refined petroleum gasoline, or ethanol.

Insignificant Activities

- (a) Storage tanks with a capacity less than or equal to one thousand (1,000) gallons and annual throughputs equal to or less than twelve thousand (12,000) gallons. [326 IAC 2-7-1(21)(G)(iii)(AA)]
 - (1) One (1) box style ethanol additive storage tank, identified as Tank 9, with a maximum storage capacity of 350 gallons, constructed in 1996.
 - (2) One (1) box style diesel additive storage tank, identified as Tank 90, with a maximum storage capacity of 550 gallons, constructed in 1996.
 - (3) Two (2) horizontal fixed roof well recovery storage tanks, identified as Tank T-11 and Tank T-21, each with a maximum storage capacity of 1,000 gallons, constructed in 1990.
 - (4) One (1) red dye additive storage tank, identified as Tank 19, with a maximum storage capacity of 350 gallons, constructed in 1996.
 - (5) One (1) horizontal fixed roof used motor oil storage tank, identified as Tank T-13, with a maximum storage capacity of 1,000 gallons, constructed in 1991.
 - (6) One (1) horizontal diesel additive storage tank, identified as Tank 22, with a maximum storage capacity of 500 gallons, constructed in 2004.
 - (7) One (1) tote diesel additive storage tank, identified as Tank 93, with a maximum storage capacity of 500 gallons, constructed in 2006.
 - (8) One (1) tote yellow dye (gasoline additive) storage tank, identified as Tank T-92, with a maximum storage capacity of 350 gallons, constructed in 2005.
- (b) Emission units whose potential uncontrolled emission of volatile organic compounds (VOCs) are less than three (3) pounds per hour or fifteen (15) pounds per day. [326 IAC 2-7-1(21)(A)(iv)]
 - (1) One (1) horizontal fixed roof gasoline detergent additive storage tank, identified as Tank T-8, with a maximum storage capacity of 3,000 gallons, constructed in 1986.

- (2) One (1) well recovery storage tank, identified as Tank T-12, with a maximum storage capacity of 5,250 gallons, constructed in 1996.
 - (3) Three (3) horizontal fixed roof remediation recovery storage tanks, identified as Tank T-14, Tank T-15, and Tank T-16, each with a maximum storage capacity of 8,000 gallons, constructed in 1986.
 - (4) Two (2) storm water storage tanks, identified as Tank T-17 and Tank T-18, each with a maximum storage capacity of 12,000 gallons, constructed in 1990.
 - (5) One (1) horizontal lubricity additive (diesel additive) storage tank, identified as Tank T-94, with a maximum storage capacity of 6,000 gallons, constructed in 2005.
- (c) One (1) ground water recovery system consisting of twenty-one (21) recovery wells. [326 IAC 2-7-1(21)(G)(vii)(BB)]
 - (d) One (1) natural gas-fired and/or propane-fired recuperative catalytic incineration system, used as control for the solid vapor extraction system, rated at 1.00 MMBtu/hr, constructed in 1993. [326 IAC 2-7-1(21)(G)(i)(AA)(aa) and (bb)]
 - (e) One (1) oil/water separator.
 - (f) Maintenance activities.
 - (g) Fugitive VOC emissions from pumps, valves, flanges, etc.
 - (h) Paved and unpaved roads and parking lots with public access. [326 IAC 2-7-1(21)(G)(xiii)]

Existing Approvals

Since the issuance of the first FESOP Renewal (F141-16296-00016) on August 11, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) First Administrative Amendment No. F141-18851-00016 issued on April 07, 2004;
- (b) Second Administrative Amendment No. F141-19046-00016 issued on September 21, 2004; and
- (c) Third Administrative Amendment No. F141-21058-00016 issued on June 16, 2005.

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.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including St. Joseph County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.

(a) Ozone Standards

- (1) 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.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 and NO_x emissions are considered when evaluating the rule applicability relating to ozone. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM_{2.5}

St. Joseph County has been classified as attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions.

(c) Other Criteria Pollutants

St. Joseph County has been classified as attainment or unclassifiable in Indiana for SO₂, CO, PM₁₀, NO₂, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) 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.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	0.03
PM ₁₀	0.03
SO ₂	0.00
VOC	773.09
CO	0.37
NO _x	0.91

HAPs	tons/year
Hexane	28.14
Benzene	2.88
Toluene	5.97
Iso-Octane	5.44
Xylene	2.22
EthylBenzene	0.27
Total	44.91

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 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 criteria pollutants are less than 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.

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.

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 of the Entire Source After Issuance of FESOP (tons/year)							
	PM	PM ₁₀	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Storage Tanks	--	--	--	--	8.15	--	0.77	0.22 (Xylene)
Loading Rack (EU VRU)	--	--	--	--	29.13	--	2.03	1.00 (Hexane)
Two (2) Air Strippers	--	--	--	--	11.50	--	0.66	0.42 (Hexane)
Soil Vapor Extraction System (North System)	negl.	negl.	negl.	negl.	2.74	negl.	0.16	0.10 (Hexane)
Specifically Regulated Insignificant Activities	--	--	--	--	5.66	--	0.31	0.20 (Hexane)
Total PTE of Entire Source	negl.	negl.	negl.	negl.	57.18	negl.	3.93	1.72 (Hexane)
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	NA	NA
negl. = negligible								

(a) FESOP Status

This existing source is not a Title V major stationary source because the potential to emit of criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year for total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) The throughput of petroleum product (gasoline) to the Loading Rack shall be less than 177,200,968 gallons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (2) The throughput of petroleum distillates through the Loading Rack shall be less than 400,000,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (3) The uncontrolled VOC emissions, when loading gasoline from the Loading Rack shall not exceed 6.86 pounds per thousand gallons.

- (4) The VOC emissions, when loading distillates from the Loading Rack shall not exceed 0.015 pounds per thousand gallons.
- (5) The minimum overall (capture and destruction) control efficiency of the vapor recovery unit (EU VRU) shall be at least ninety-five percent (95.71%) of the VOC emissions from the Loading Rack.

Compliance with these limits, combined with the potential to emit VOC and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than one hundred (100) tons per twelve (12) consecutive month period, any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) & 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

- (b) 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

- (a) New Source Performance Standards (NSPS)
 - (1) The requirements of the New Source Performance Standard for 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, 40 CFR 60.110, Subpart K (326 IAC 12), 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, 40 CFR 60.110a-115a, Subpart Ka (326 IAC 12), and 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, 40 CFR 60.110b-117b, Subpart Kb (326 IAC 12), are not included in the permit, for the following reasons:
 - (a) Tanks 1, 2, 3, 4, 6, and 7 were constructed prior to June 11, 1973;
 - (b) Tanks T-8, 9, 90, T-10, T-11, T-12, T-13, T-14, T-15, T-16, 19 and T-20 have a storage capacity less than 75 m3 (19,813 gallons), which is the minimum applicable threshold for each of the three rules; and
 - (c) Tanks T-17 and T-18 do not store volatile organic compounds.
 - (2) The one (1) bottom loading two (2) bay tank truck loading rack, identified as Loading Rack, using a carbon adsorption gasoline vapor recovery unit, identified as EU VRU, as control, is subject to the New Source Performance Standard for Bulk Gasoline Terminals (40 CFR 60, Subpart XX), which is incorporated by reference as 326 IAC 12, because construction of this unit commenced after December 17, 1980.

Applicable portions of the NSPS are the following:

- (1) 40 CFR 60.500
- (2) 40 CFR 60.501
- (3) 40 CFR 60.502

- (4) 40 CFR 60.503
- (5) 40 CFR 60.505
- (6) 40 CFR 60.506

Nonapplicable portions of the NSPS will not be included in the permit.

The requirements of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to the unit except when otherwise specified in 40 CFR 60, Subpart XX.

- (3) There are no other New Source Performance Standards (NSPS)(40 CFR Part 60) included in the permit.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAP)
There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.
- (c) Compliance Assurance Monitoring (CAM)
Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under Potential to Emit After Issuance.

326 IAC 2-6 (Emission Reporting)
This source is located in St. Joseph 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 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in 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.

State Rule Applicability – Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
Tank T-20, constructed in 1997, will emit less than 10 tons per year of any single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply to Tank T-20.

326 IAC 8-1-6 (General Volatile Organic Compound Reduction Requirements)
The uncontrolled VOC potential emissions from the one (1) soil vapor extraction system (North System), constructed in 1993, is greater than twenty-five (25) tons per year. Pursuant to CP 141-3103-00016, issued on September 29, 1993, IDEM, OAQ determined that using the natural gas-fired recuperative catalytic incineration system rated at 98% overall control efficiency, with catalyst inlet temperature at a minimum of 600 °F is Best Available Control Technology (BACT)

for the soil vapor extraction system (North System). The PTE VOC after control is less than 2.74 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are satisfied.

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

The storage tanks identified as Tank 2, 4, and 7, each with a capacity greater than 39,000 gallons containing volatile organic liquid whose true vapor pressure is greater than 1.52 pounds per square inch (psi) are subject to the requirements of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities).

Pursuant to 326 IAC 8-4-3(b), the source shall not permit the use of Tanks 2, 4 and 7 unless:

- (a) The facility has been retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with an equally effective alternative control which has been approved.
- (b) The facility is maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.
- (c) All openings, except stub drains, are equipped with covers, lids, or seals such that:
 - (1) the cover, lid, or seal is in the closed position at all times except when in actual use;
 - (2) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports; and
 - (3) rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

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

Pursuant to 326 IAC 8-4-1, the loading of gasoline into any transports at this source is subject to the requirements of 326 IAC 8-4-4 (Bulk Gasoline Terminals) because the source is a bulk gasoline terminal having a capacity greater than 20,000 gallons per day. The source is in compliance with the requirements of this rule because the Loading Rack is equipped with an approved control system (Vapor Recovery Unit (EU VRU)) to control VOC emissions to less than 35 mg/l (0.000292 lb/10³ gal) of gasoline loaded (equivalent to an overall VOC control efficiency (including capture and destruction efficiencies) of 98.6%), which meets the required concentration of less than 80 mg/l (0.000668 lb/10³ gal) VOC.

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

The source is not subject to the requirements of 326 IAC 8-4-5 (Bulk Gasoline Plants) because the source does not meet the definition of a bulk gasoline plant, which requires a daily gasoline throughput of less than 20,000 gallons per day.

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

The source is not subject to the requirements of 326 IAC 8-4-6 (Gasoline Dispensing Facilities), because the source does not dispense gasoline into motor vehicle fuel tanks or portable containers and is not a gasoline dispensing facility.

326 IAC 8-4-7 (Gasoline Transports)

The source is not subject to the requirements of 326 IAC 8-4-7 (Gasoline Transports), because it is not an owner or operator of a gasoline transport.

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

Pursuant to 326 IAC 8-4-9, sources subject to the requirements of 326 IAC 8-4-4 are also subject to the requirements of 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems;

Records). Pursuant to this rule, the source will comply with the requirements of this rule because the Loading Rack is equipped with a collection system (vapor recovery unit (EU VRU)), which has been demonstrated to have an overall VOC control efficiency of 95.71%. The source will operate the vapor collection system in accordance with the specified work practice standards and will maintain the required records associated with the operation of the vapor collection and vapor control system (EU VRU).

326 IAC 8-6 (Organic Solvent Emission Limitations)

Pursuant to 326 IAC 8-6-1, the requirements of this rule apply to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source was constructed before the rule applicability date of October 7, 1974, and therefore is not subject to this rule.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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 and Monitoring Requirements applicable to this FESOP Renewal are as follows:

(a) Compliance Determination for the Vapor Recovery Unit (EU VRU)

Control Device	Next Test Date	Parameters	Frequency of Testing	Limit or Requirement
Vapor Recovery Unit (EU VRU) for the Loading Rack	Before November 10, 2012 *	VOC Control Efficiency	Every five years	326 IAC 2-8-4(1) Limit 95.71%

* The dates correspond to 5 years since the latest valid stack test plus 180 days.

(b) Compliance Monitoring Requirements for the vapor collection system and vapor recovery unit (EU VRU)

Control Device	Parameter	Frequency	Range	Excursions and Exceedances
Vapor Collection System and Vapor Recovery Unit (EU VRU) for the Loading Rack	Visible Liquid and Vapor Leaks	Monthly	Normal-Abnormal	Response Steps

(c) Compliance Determination for the Recuperative Catalytic Incineration System

Control Device	Parameters	Limit or Requirement
Recuperative Catalytic Incineration System for the Soil Vapor Extraction System (North System)	3 hour-average temperature	326 IAC 2-8-4(1)

(d) Compliance Monitoring Requirements for the Recuperative Catalytic Incineration System

Control Device	Parameter	Frequency	Range	Excursions and Exceedances
Recuperative Catalytic Incineration System for the Soil Vapor Extraction System (North System)	Temperature	Continuous and 3 hour average	≥ 600 °F	Response Steps

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 November 14, 2007.

Conclusion

The operation of this stationary bulk petroleum storage and transfer terminal shall be subject to the conditions of the attached FESOP Renewal No. F 141-16296-00016.

Company Name: BP Products North America, Inc. - Granger Terminal
 Address City IN Zip: 12694 Adams Road, Granger, Indiana 46530
 2nd Renewal FESOP No.: F141-25535-00016
 Reviewer: Joe Sachse

SUMMARY UNCONTROLLED & LIMITED PTE

Summary Uncontrolled PTE (tons/yr)

Pollutant	Storage Tanks	Loading Rack	Air Strippers	Soil Vapor Extraction System	Specifically Regulated Insignificant Activities *	TOTAL (tons/yr)
PM	--	--	--	--	0.03	0.03
PM ₁₀	--	--	--	--	0.03	0.03
SO ₂	--	--	--	--	--	--
NO _x	--	--	--	--	0.91	0.91
VOC	8.15	610.78	11.50	137.00	5.66	773.09
CO	--	--	--	--	0.37	0.37
total HAPs	0.77	35.30	0.66	7.84	0.31	44.88
worst case single HAP	0.22 (Xylene)	22.29 (Hexane)	0.42 (Hexane)	5.01 (Hexane)	0.20 (Hexane)	27.72 (Hexane)

Total emissions are based on rated capacities at 8,760 hours/year.

* Specifically Regulated Insignificant Activities: Oil / Water Separator, Maintenance Activities, Recuperative Catalytic Incinerator, & Process Fugitive VOC Emissions

Summary Limited PTE (tons/yr)

Pollutant	Storage Tanks	Loading Rack	Air Strippers	Soil Vapor Extraction System	Specifically Regulated Insignificant Activities *	TOTAL (tons/yr)
PM	--	--	--	--	0.03	0.03
PM ₁₀	--	--	--	--	0.03	0.03
SO ₂	--	--	--	--	--	--
NO _x	--	--	--	--	0.91	0.91
VOC	8.15	29.13	11.50	2.74	5.66	57.18
CO	--	--	--	--	0.37	0.37
total HAPs	0.77	2.03	0.66	0.16	0.31	3.93
worst case single HAP	0.22 (Xylene)	1.00 (Hexane)	0.42 (Hexane)	0.10 (Hexane)	0.20 (Hexane)	1.72 (Hexane)

Total emissions are based on rated capacities at 8,760 hours/year.

Single HAP and Total HAPs emissions shall be limited to 10 and 25 tons per year, respectively, to satisfy the requirements of 326 IAC 2-8-4.

* Specifically Regulated Insignificant Activities: Oil / Water Separator, Maintenance Activities, Recuperative Catalytic Incinerator, & Process Fugitive VOC Emissions

Company Name: BP Products North America, Inc. - Granger Terminal
 Address City IN Zip: 12694 Adams Road, Granger, Indiana 46530
 2nd Renewal FESOP No.: F141-25535-00016
 Reviewer: Joe Sachse

SUMMARY UNCONTROLLED and CONTROLLED PTE HAPs (tons/yr)

Summary Uncontrolled PTE HAPs (tons/yr)

Pollutant	Storage Tanks	Loading Rack	Air Strippers	Soil Vapor Extraction System	Specifically Regulated Insignificant Activities *	TOTAL (tons/yr)
Hexane	0.20	22.29	0.42	5.01	0.21	28.14
Benzene	0.04	2.27	0.04	0.51	0.02	2.88
Toluene	0.22	4.63	0.08	1.00	0.04	5.97
Iso-Octane	0.03	4.31	0.08	0.97	0.04	5.44
Xylene	0.22	1.62	0.03	0.32	0.04	2.22
EthylBenzene	0.06	0.18	0.00	0.03	0.00	0.27
total HAPs	0.77	35.30	0.66	7.84	0.35	44.91
worst case single HAP	0.22 (Xylene)	22.29 (Hexane)	0.42 (Hexane)	5.01 (Hexane)	0.21 (Hexane)	28.14 (Hexane)

Total emissions are based on rated capacities at 8,760 hours/year.

* Specifically Regulated Insignificant Activities: Oil / Water Separator, Maintenance Activities, Recuperative Catalytic Incinerator, & Process Fugitive VOC Emissions

Summary Controlled PTE HAPs (tons/yr)

Pollutant	Storage Tanks	Loading Rack	Air Strippers	Soil Vapor Extraction System	Specifically Regulated Insignificant Activities *	TOTAL (tons/yr)
Hexane	0.20	1.00	0.42	0.10	0.21	1.93
Benzene	0.04	0.12	0.04	0.01	0.02	0.23
Toluene	0.22	0.38	0.08	0.02	0.04	0.74
Iso-Octane	0.03	0.19	0.08	0.02	0.04	0.36
Xylene	0.22	0.28	0.03	0.01	0.04	0.57
EthylBenzene	0.06	0.07	0.00	0.00	0.00	0.13
total HAPs	0.77	2.03	0.66	0.16	0.35	< 25.0
worst case single HAP	0.22 (Xylene)	1.00 (Hexane)	0.42 (Hexane)	0.10 (Hexane)	.21 (Hexane)	< 10.0

Total emissions are based on rated capacities at 8,760 hours/year.

Single HAP and total HAPs emissions shall be limited to 10 and 25 tons per year, respectively, to satisfy the requirements of 326 IAC 2-8-4.

* Specifically Regulated Insignificant Activities: Oil / Water Separator, Maintenance Activities, Recuperative Catalytic Incinerator, & Process Fugitive VOC Emissions

STORAGE TANKS - UNCONTROLLED PTE VOC

External Floating Roof Tanks	Product Stored	Losses (tons/yr)				Total VOC (tons/yr)
		Breathing	Working	Standing	Withdrawal	
Tank 2	Gasoline	--	--	0.6012	0.3536	0.9548
Tank 4	Gasoline	--	--	0.5232	0.4421	0.9652
Tank 7	Gasoline	--	--	2.0757	0.4422	2.5178

Vertical Fixed Roof Tanks	Product Stored	Losses (tons/yr)				Total VOC (tons/yr)
		Breathing	Working	Standing	Withdrawal	
Tank 1	Distillates	0.1090	0.8838	--	--	0.9928
Tank 3	Distillates	0.1384	0.9846	--	--	1.1230
Tank 6	Distillates	0.0482	0.8046	--	--	0.8527

Horizontal Fixed Roof Tanks	Product Stored	Losses (tons/yr)				Total VOC (tons/yr)
		Breathing	Working	Standing	Withdrawal	
Tank T-8	gasoline additive	0.0002	0.0005	--	--	0.0008
Tank T-10	slop	0.1801	0.5429	--	--	0.7230
Tank T-20	diesel additive	0.0052	0.0135	--	--	0.0187

Losses (tons/yr)				Total VOC (tons/yr)
Breathing	Working	Standing	Withdrawal	
0.4811	3.2299	3.2000	1.2378	8.15

NOTE: Emissions were estimated using US EPA's Tanks 4.09 software program and are based on the estimated maximum annual throughput for each fuel/additive.

STORAGE TANKS - UNCONTROLLED PTE HAPs

GASOLINE

Pollutant		Hexane	Benzene	Toluene	Iso-Octane	Xylenes	EthylBenzene	Methanol	Total HAPs
HAP to VOC EF (% by wt.) *		3.66%	0.37%	0.73%	0.71%	0.23%	0.02%	0.00%	
Uncontrolled VOC (tons/yr)									
Tank 2	0.95	0.03	0.00	0.01	0.01	0.00	0.00	0.00	0.05
Tank 4	0.97	0.04	0.00	0.01	0.01	0.00	0.00	0.00	0.06
Tank 7	2.52	0.09	0.01	0.02	0.02	0.01	0.00	0.00	0.14
Total (tons/yr)		0.16	0.02	0.03	0.03	0.01	0.00	0.00	0.25

DISTILLATES

Pollutant		Hexane	Benzene	Toluene	Iso-Octane	Xylenes	EthylBenzene	Methanol	Total HAPs
HAP to VOC EF (% by wt.)		1.43%	0.67%	6.28%	0.00%	7.14%	1.97%	0.00%	
Uncontrolled VOC (tons/yr)									
Tank 1	0.99	0.01	0.01	0.06	0.00	0.07	0.02	0.00	0.17
Tank 3	1.12	0.02	0.01	0.07	0.00	0.08	0.02	0.00	0.20
Tank 6	0.85	0.01	0.01	0.05	0.00	0.06	0.02	0.00	0.15
Total (tons/yr)		0.04	0.02	0.19	0.00	0.21	0.06	0.00	0.52
TOTAL (tons/yr)		0.20	0.04	0.22	0.03	0.22	0.06	0.00	0.77

METHODOLOGY: Controlled PTE HAP (tons/yr) = Uncontrolled PTE VOC (tons/yr) x Weight % HAP

* NOTE: The worst case HAP content is from diesel and kerosene HAP contents.

LOADING RACK - PTE VOC

Uncontrolled and Controlled PTE VOC (Controlled by a Carbon Adsorption Gasoline Vapor Recovery Unit (EU VRU))

	Working Throughput (kgal/yr) *	Saturation Factor (S)	Molecular Weight (lb/lb-mole)	Temp. (°F)	Total Vapor Pressure (psi)	AP-42 EF (lb/kgal)	Uncontrolled PTE VOC (tons/yr)	Overall Control Efficiency	Controlled PTE VOC (tons/yr)	
Gasoline	177,201	1.0	66	49.07	4.2461	6.8592	607.73	95.71%	26.07	
Distillates	400,000	1.0	130	49.07	0.0048	0.0153	3.05	0.00%	3.05	
							Uncontrolled Total	610.78	Controlled Total	29.13

METHODOLOGY: AP-42 EF (lb/kgal) = 12.46 x S x MW x TVP / (T+460), from AP-42, Table 5.2-1, 5th ed, 1995.

METHODOLOGY: Uncontrolled PTE VOC (tons/yr) = Working Throughput (kgal/yr) x AP-42 EF (lb/kgal) x 1 ton/2000lbs

METHODOLOGY: Controlled PTE VOC (tons/yr) = Uncontrolled PTE VOC (tons/yr) x (1-Overall Control Efficiency)

* NOTE: The working throughputs are based upon the facility's maximum loading capacity that was determined by a stack test performed on November 28, 2000.

** NOTE: The capture efficiency for the Vapor Recovery Unit is estimated to be 99.12%, which is based on Bay Area Air Quality Management District (BAAQMD), EPA Transport Truck Studies (EPA-450/3-79-018) and BP's data. The same capture efficiency was used in FESOP Renewal No.: F 141-16296-00016, issued August 11, 2003.

LOADING RACK PTE HAPs

Uncontrolled PTE HAPs

(using GASOLINE as fuel)

HAP	Hexane	Benzene	Toluene	Iso-Octane	Xylenes	EthylBenzene	Methanol	Total HAPs
HAP to VOC EF (% by wt.)	3.66%	0.37%	0.73%	0.71%	0.23%	0.02%	0.00%	--
Uncontrolled PTE VOC	607.73	607.73	607.73	607.73	607.73	607.73	607.73	--
Uncontrolled PTE HAP	22.24	2.25	4.44	4.31	1.40	0.12	0.00	34.76

(using DISTILLATES as fuel)

HAP	Hexane	Benzene	Toluene	Iso-Octane	Xylenes	EthylBenzene	Methanol	Total HAPs
HAP to VOC EF (% by wt.)	1.43%	0.67%	6.28%	0.00%	7.14%	1.97%	0.00%	--
Uncontrolled PTE VOC	3.05	3.05	3.05	3.05	3.05	3.05	3.05	--
Uncontrolled PTE HAP	0.04	0.02	0.19	0.00	0.22	0.06	0.00	0.53

TOTAL

HAP	Hexane	Benzene	Toluene	Iso-Octane	Xylenes	EthylBenzene	Methanol	Total HAPs
Total Uncontrolled PTE HAP (tons/yr)	22.29	2.27	4.63	4.31	1.62	0.18	0.00	35.30

Controlled PTE HAPs

(using GASOLINE as fuel)

HAP	Hexane	Benzene	Toluene	Iso-Octane	Xylenes	EthylBenzene	Methanol	Total HAPs
HAP to VOC EF (% by wt.)	3.66%	0.37%	0.73%	0.71%	0.23%	0.02%	0.00%	--
Controlled PTE VOC	26.07	26.07	26.07	26.07	26.07	26.07	26.07	--
Controlled PTE HAP	0.95	0.10	0.19	0.19	0.06	0.01	0.00	1.49

(using DISTILLATES as fuel)

HAP	Hexane	Benzene	Toluene	Iso-Octane	Xylenes	EthylBenzene	Methanol	Total HAPs
HAP to VOC EF (% by wt.)	1.43%	0.67%	6.28%	0.00%	7.14%	1.97%	0.00%	--
Controlled PTE VOC	3.05	3.05	3.05	3.05	3.05	3.05	3.05	--
Controlled PTE HAP	0.04	0.02	0.19	0.00	0.22	0.06	0.00	0.53

TOTAL

HAP	Hexane	Benzene	Toluene	Iso-Octane	Xylenes	EthylBenzene	Methanol	Total HAPs
Total Uncontrolled PTE HAP (tons/yr)	1.00	0.12	0.38	0.19	0.28	0.07	0.00	2.02

TWO (2) AIR STRIPPERS (S/V 001A & 001B)

Uncontrolled and Controlled PTE VOC

Gas Flow Rate (acfm)	Uncontrolled PTE VOC (tons/yr)	Control Efficiency (%)	Controlled PTE VOC (tons/yr)
7200	11.50	0.00%	11.50

NOTE: The VOC emissions from the two (2) Air Strippers (S/V 001A & 001B) are from the FESOP Renewal No.: F141-16296-00016 and were provided by the source.

Uncontrolled PTE HAPs

HAP	Hexane	Benzene	Toluene	Iso-Octane	Xylenes	EthylBenzene	Methanol	Total HAPs
HAP to VOC EF (% by wt.)	3.66%	0.37%	0.73%	0.71%	0.23%	0.02%	0.00%	--
Uncontrolled PTE VOC (tons/yr)	11.50	11.50	11.50	11.50	11.50	11.50	11.50	--
Uncontrolled PTE HAPs (tons/yr)	0.42	0.04	0.08	0.08	0.03	0.00	0.00	0.66

METHODOLOGY: HAPs Emission Rate (tons/yr) = Uncontrolled PTE VOC (tons/yr) x Weight % HAP

NOTE: The worst case scenario is represented by using gasoline in the two (2) Air Strippers (S/V 001A & 001B).

OIL / WATER SEPARATOR & MAINTENANCE ACTIVITIES
(Specifically Regulated Insignificant Activities)

LIMITED PTE VOC and HAPs

Limited PTE VOC

	Limited PTE VOC (lb/day)	Limited PTE VOC (tons/yr)
Oil/Water Separator	15	2.74
Maintenance Activities	15	2.74
TOTAL		5.48

NOTE: The limited VOC emissions for the Oil / Water Separator and Maintenance Activities were obtained from the original FESOP No.: F141-5556-00016 and the Renewal FESOP No.: F141-16296-00016 and represent the insignificant threshold emission limit of 15 pounds per day.

Uncontrolled PTE HAPs

Pollutant	Hexane	Benzene	Toluene	Iso-Octane	Xylenes	Ethyl Benzene	Methanol	Total HAPs
HAP to VOC EF (% by wt.)	3.66%	0.37%	0.73%	0.71%	0.23%	0.02%	0.00%	--
Uncontrolled PTE HAPs (tons/yr) *	5.50	5.50	5.50	5.50	5.50	5.50	5.50	--
TOTAL (tons/yr)	0.20	0.02	0.04	0.04	0.01	0.00	0.00	0.31

Single HAP and total HAP emissions shall be limited to 10 and 25 tons per year, respectively, to satisfy the requirements of 326 IAC 2-8-4.

METHODOLOGY: Uncontrolled PTE HAPS emission rate (tons/yr) = Uncontrolled PTE VOC emission rate (tons/yr) x Weight % HAP x 1 ton/2000 lbs

* NOTE: The worst case scenario is represented by using gasoline as fuel and includes VOC emissions from the Recuperative Catalytic Incinerator System.

PROCESS FUGITIVE

Uncontrolled PTE

Component Type	Service	Average EF (lb/hr/unit)	Quantity	PTE VOC Emissions (lb/hr)	PTE VOC Emissions (tons/yr)
Fittings (connectors, flanges)	Light Liquid	1.76E-05	600	0.011	0.05
Others (compressors, relief valves)	Light Liquid	2.87E-04	2	0.001	0.00
Pumps	Light Liquid	1.19E-03	9	0.011	0.05
Valves	Light Liquid	9.48E-05	135	0.013	0.06
Load Arms	Light Liquid	2.87E-04	10	0.003	0.01
Total				0.03	0.16

NOTE: EFs were taken from US EPA OAQ Planning and Standards, Protocol for Equipment Leak Emission Estimates. (US EPA - Research Triangle Park, NC, EPA-453/R-95-017, 1995, Table 2-3)

METHODOLOGY: Uncontrolled PTE VOC (tons/yr) = Quantity x EF x (1 ton / 2000 lb) x (8760 hr / yr)

SOIL VAPOR EXTRACTION SYSTEM (NORTH SYSTEM) - PTE VOC and HAPs (Controlled by a Recuperative Catalytic Incineration System)

Uncontrolled and Controlled PTE VOC

Gas Flow Rate (acfm)	Uncontrolled PTE VOC (tons/yr)	Control Efficiency (%)	Controlled PTE VOC (tons/yr)
2000	137.00	98	2.74

NOTE: The uncontrolled PTE VOC was obtained from the Renewal FESOP No.: F141-16296-00016 and was provided by the source.

NOTE: The controlled PTE VOC for the Soil Vapor Extraction System represents the insignificant threshold emission limit of 15 pounds per day.

Uncontrolled PTE HAPs

HAP	Hexane	Benzene	Toluene	Iso-Octane	Xylenes	EthylBenzene	Methanol	Total HAPs
HAP to VOC EF (% by wt.)	3.66%	0.37%	0.73%	0.71%	0.23%	0.02%	0.00%	--
Maximum PTE VOC (tons/yr)	137.00	137.00	137.00	137.00	137.00	137.00	137.00	--
Maximum PTE HAPs (tons/yr)	5.01	0.51	1.00	0.97	0.32	0.03	0.00	7.84

METHODOLOGY: Uncontrolled PTE HAPs (tons/yr) = Uncontrolled PTE VOC (tons/yr) x Weight % HAP

NOTE: The worst case scenario is represented by using gasoline as fuel in the Soil Vapor Extraction System.

Controlled PTE HAPs

HAP	Hexane	Benzene	Toluene	Iso-Octane	Xylenes	EthylBenzene	Methanol	Total HAPs
HAP to VOC EF (% by wt.)	3.66%	0.37%	0.73%	0.71%	0.23%	0.02%	0.00%	--
Controlled PTE VOC (tons/yr)	2.74	2.74	2.74	2.74	2.74	2.74	2.74	--
Controlled PTE HAPs (tons/yr)	0.10	0.01	0.02	0.02	0.01	0.00	0.00	0.16

Single HAP and total HAP emissions shall be limited to 10 and 25 tons per year, respectively, to satisfy the requirements of 326 IAC 2-8-4.

METHODOLOGY: Controlled PTE HAPs (tons/yr) = Controlled PTE VOC (tons/yr) * Weight % HAP

NOTE: The worst case scenario is represented by using gasoline as fuel in the Soil Vapor Extraction System.

RECUPERATIVE CATALYTIC INCINERATION SYSTEM
(Control unit for Soil Vapor Extraction System (North System))
(Specifically Regulated Insignificant Activity)

(using Natural Gas as fuel)

	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)				
	1.00	8.76				
	PM *	PM ₁₀ *	SO ₂	NO _x **	VOC	CO
Emission Factor (lb/MMCF)	1.9	7.6	0.6	100.0	5.5	84.0
Uncontrolled PTE (tons/yr)	0.00	0.03	0.00	0.44	0.02	0.37

METHODOLOGY: EFs from AP-42, Ch. 1.4, Tables 1.4-1, 1.4-2, & 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, & 1-03-006-03. (SUPPLEMENT D 3/98)

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Uncontrolled PTE (tons/yr) = Potential Throughput (MMCF/yr) x EF (lb/MMCF) / (2,000 lbs/1 ton)

NOTE: * The PM EF represents filterable PM only. The PM₁₀ EF represents both filterable and condensable PM₁₀.

NOTE: ** The EFs for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, & Low NO_x Burners/Flue gas recirculation = 32.

(Using Propane as fuel)

	Heat Input Capacity (MMBtu/hr)	Potential Throughput (kgals/yr)	Sulfur Content (S) (grains/100ft ³)			
	1.00	95.74	0.00			
	PM *	PM ₁₀ *	SO ₂ **	NO _x	VOC ***	CO
Emission Factor (lb/kgal)	0.6	0.6	0.0	19.0	0.5	3.2
Uncontrolled PTE (tons/yr)	0.03	0.03	0.00	0.91	0.02	0.15

METHODOLOGY: one (1) gallon of LPG has a heating value of 94,000 Btu; one (1) gallon of propane has a heating value of 91,500 Btu;

(use this to convert EFs to an energy basis for propane); AP42 (Supplement B 10/96), page 1.5-1 & Table 1.5-1. (SCC #1-02-010-02)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x (1kgal / 1000 gallon) x (1 gal/0.0915 MMBtu)

Uncontrolled PTE (tons/yr) = Potential Throughput (MMCF/yr) x EF (lb/MMCF) / (2,000 lbs/1 ton)

NOTE: * The PM EF represents filterable PM only. The PM₁₀ EF represents both filterable and condensable PM₁₀.

** SO₂ Emission Factor = 0.10 x S.

*** VOC EF represents TOC. Methane EF = 0.2 lb/kgal.