



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: March 26, 2009

RE: BP Products / 097 - 25559 - 00076

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



**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](http://www.idem.IN.gov)

**Federally Enforceable State Operating Permit Renewal**

**OFFICE OF AIR QUALITY**

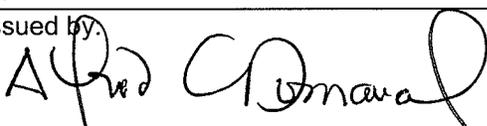
**BP Products North America Inc. - Indianapolis Terminal  
2500 North Tibbs Avenue  
Indianapolis, Indiana 46222**

(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.: F097-25559-00076	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: March 26, 2009 Expiration Date: March 26, 2019

## TABLE OF CONTENTS

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B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	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

**Compliance Requirements [326 IAC 2-1.1-11]**

- C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

**Stratospheric Ozone Protection**

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

**D.1. EMISSIONS UNIT OPERATION CONDITIONS ..... 24**

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

- D.1.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) [326 IAC 2-8-4]  
[326 IAC 20] [40 CFR 63 Subpart R]
- D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-4]
- D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-4-9]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.1.5 VOC and HAP
- D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1)] [326 IAC 2-1.1-11]

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

- D.1.7 Carbon Adsorber

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

- D.1.8 Record Keeping Requirements
- D.1.9 Reporting Requirements

**New Source Performance Standards (NSPS) Requirements**

- D.1.10 General Provisions relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]
- D.1.11 RNew Source Performance Standards (NSPS) standards of Performance for Bulk Gasoline  
Terminals [326 IAC 12] [40 CFR 60, Subpart XX]

**D.2. EMISSIONS UNIT OPERATION CONDITIONS ..... 30**

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

- D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-4-3]
- D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

- D.2.3 Monitoring

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

D.2.4 Record Keeping Requirements [326 IAC 8-4-3(d)]

**D.3. EMISSIONS UNIT OPERATION CONDITIONS ..... 32**

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

D.3.3 Particulate Emission Limitations for Sources of Indirect Heating (PM) [326 IAC 6-2-4]

**Certification Form..... 34**

**Emergency Occurrence Form..... 35**

**FESOP Quarterly Report Form..... 37**

**Quarterly Deviation and Compliance Monitoring Report Form ..... 38**

**ATTACHMENT A: 40 CFR Part 60 Subpart XX, New Source Performance Standards  
for Bulk Gasoline Terminals.....40**

## 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 petroleum product loading terminal.

Source Address:	2500 North Tibbs Avenue, Indianapolis, Indiana 46222
Mailing Address:	150 W. Warrenville Rd. Bldg. 502, 1225, Naperville, IL 60563
General Source Phone Number:	317-926-5471
SIC Code:	5171
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Nonattainment New Source Review Rules Minor Source, Section 112 of the Clean Air Act 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) loading rack for dispensing of petroleum product, with one (1) carbon adsorber, identified as V10, for control of volatile organic compounds. Loading rack installed in 1993.  
  
Under the Standards of Performance for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX), the petroleum products loading rack is an affected facility.
- (b) Storage tank # 1, equipped with a fixed roof, 1,365,000 gallons storage capacity, used to store HS diesel, and constructed in 1941.
- (c) Storage tank #2, equipped with an external pontoon floating roof with a dome, 672,000 gallon storage capacity, used to store Slop interface, and constructed in 1940.
- (d) Storage tank #3, equipped with an external pontoon floating roof with a dome, 672,000 gallon storage capacity, used to store ethanol, and constructed in 1941.
- (e) Storage tank # 4, equipped with a fixed roof, 1,365,000 gallon storage capacity, used to store LS diesel supreme, and constructed in 1941.
- (f) Storage tank # 5, equipped with a fixed roof, 1,365,000 gallon storage capacity, used to store Kerosene, and constructed in 1941.
- (g) Storage tank #6, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store Subgrade/regular gasoline, and constructed in 1941.

- (h) Storage tank #7, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store Subgrade/ regular gasoline, and constructed in 1941.
- (i) Storage tank #8, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store Premium gasoline, and constructed in 1942.
- (j) Storage tank # 10, equipped with a fixed roof, 92,400 gallon storage capacity, used to store Slop diesel, and constructed in 1941.
- (k) Storage tank # 11, equipped with a fixed roof, 3,360,000 gallon storage capacity, used to store LS diesel, and constructed in 1970.

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) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight. [326 IAC 6-2-4]
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluid.
- (e) Filling drums, pails or other packaging containers with lubricating oils, waxes, and grease.
- (f) Cleaners and solvents characterized as follows:
  - (1) having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100 °F) or ;
  - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20 degrees C (68 °F);
- (g) Groundwater oil recovery wells.
- (h) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (i) Process vessels degassing and cleaning to prepare for internal repair.
- (j) Paved and unpaved roads and parking lots with public access.
- (k) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (l) On-site fire and emergency response training approved by the department.
- (m) Filter or coalescer media changeout.

- (n) Laboratory as defined in 326 IAC 2-7-1(21)(D)
- (o) The following facilities with VOC emissions less than 3 (three) pounds per hour or (15) fifteen pounds per day which are not specified in form GSD10(a) of the application:
  - (1) Tank 12, 8,000 gallon diesel tank
  - (2) Tank 13, 1,000 gallon gasoline tank
  - (3) Tank 14, Oil/water separator
  - (4) Tank 14a, 6000 gallon underground storage tank
  - (4) Tank 15, 2,000 gallon pump-off tank
  - (5) Tank 16, 1,100 gallon heater oil tank for shop
  - (6) Tank 17, 8,000 gallon UST
  - (7) Tank 18, 1,000 gallon furnace oil UST
  - (8) Tank 19, 500 gallon oil recycling tank
  - (9) Tank 20, 8,200 gallon OGA additive tank
  - (10) Tank 21, 2,000 gallon VRU knock out tank
  - (11) Tank 22, 1,000 gallon ground water tank
  - (12) Tank 23, 1,000 gallon oil recovery tank
  - (13) Tank 24, 8,000 gallon additive tank
  - (14) Tank 25, 700 gallon additive tank
  - (15) Tank 26, 350 gallon additive tank
  - (16) Tank 27, 1,000 gallon oil recovery tank
  - (17) Air Stripper
  - (18) Other Miscellaneous Activities (loading, refueling, lab and maintenance)
- (p) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

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, F097-25559-00076, 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] [IC 13-17-12]**

---

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 and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

**B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

---

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance and Enforcement 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 F097-25559-00076 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 and Enforcement Branch, 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 Administration and Support Section, 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 Administration and Support Section, 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 Administration and Support Section, 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.

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 Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]**

---

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

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

---

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 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) Pursuant to 326 IAC 2-2 (PSD), 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.

(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  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 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 and Enforcement Branch, 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 or ninety (90) days of initial start-up, whichever is later. 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 and Enforcement 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 or ninety (90) days of initial start-up, whichever is later.

#### **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 and Enforcement Branch, 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[326 IAC 2-8-4(10)]:

- (a) One (1) loading rack for dispensing of petroleum product, with one (1) carbon adsorber, identified as V10, for control of volatile organic compounds. Loading rack installed in 1993.

Under the Standards of Performance for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX), the petroleum products loading rack is an affected facility.

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

- (a) The VOC emissions from the vapor recovery unit on the loading rack shall not exceed 35 milligrams per liter of gasoline loaded (0.292 lbs per 1000 gals).
- (b) The amount of gasoline and distillate oil product loaded at the loading rack are limited to less than 400,000,000 gallons per 12 consecutive month period and 270,000,000 gallons per 12 consecutive month period, respectively. Compliance with this limits source wide VOC emissions to less than one hundred tons per 12 consecutive month period.
- (c) The single HAP emissions from the vapor recovery unit on the loading rack shall not exceed 2.14 pounds per hour.
- (d) The total combined HAPs emissions from the vapor recovery unit on the loading rack shall not exceed 5.35 pounds per hour.

Compliance with these limitations will limit the VOC and HAP emissions from the loading rack such that the source-wide VOC emissions are less than 100 tons per consecutive 12 month period, and the HAP emissions are less than 10 tons for any single HAP and less than 25 tons for total combined HAP, and will make the requirements of 326 IAC 2-7 and 40 CFR 63.420 (Subpart R) not applicable.

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

Pursuant to 326 IAC 8-4-4 (Bulk gasoline terminals):

- (a) No owner or operator of a bulk gasoline terminal shall permit the loading of gasoline into any transport, excluding railroad tank cars, or barges, unless:
- (1) The bulk gasoline terminal is equipped with a vapor control system, in good working order, in operation and consisting of one of the following:
- (A) An adsorber or condensation system which processes and recovers vapors and gases from the equipment being controlled, releasing no more than 80 milligrams per liter of VOC to the atmosphere.
- (B) A vapor collection system which directs all vapors to a fuel gas system or incinerator.

- (C) An approved control system, demonstrated to have control efficiency equivalent to or greater than clause (A) above.
  - (2) Displaced vapors and gases are vented only to the vapor control system.
  - (3) A means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
  - (4) All loading and vapor lines are equipped with fittings which make vapor-tight connections and which will be closed upon disconnection.
- (b) If employees of the owner of the bulk gasoline terminal are not present during loading, it shall be the responsibility of the owner of the transport to make certain the vapor control system is attached to the transport. The owner of the terminal shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with this section.

#### D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-4-9]

---

Pursuant to 326 IAC 8-4-9 (Leaks from transports and vapor collection systems, records) the source will operate a vapor control system. The requirements are as follows:

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

- (2) Repairs by the gasoline transport owner or operator, if the transport does not meet the criteria of subdivision (1), and retesting to prove compliance with the criteria of subdivision (1).
- (b) The annual test data remain valid until the end of the twelfth calendar month following the test. The owner of the gasoline transport shall be responsible for compliance with subsection (b) and shall provide the owner of the loading facility with the most recent valid modified 40 CFR 60, Appendix A, Method 27 test results upon request. The owner of the loading facility shall take all reasonable steps, including reviewing the test date and tester's signature, to ensure that gasoline transports loading at its facility comply with subsection (a).
- (c) The owner or operator of a vapor balance system or vapor control system subject to this rule shall:
  - (1) design and operate the applicable system and the gasoline loading equipment in a manner that prevents:
    - (A) gauge pressure from exceeding four thousand five hundred (4,500) pascals (eighteen (18) inches of H<sub>2</sub>O) and a vacuum from exceeding one thousand five hundred (1,500) pascals (six (6) inches of H<sub>2</sub>O) in the gasoline transport;
    - (B) except for sources subject to 40 CFR 60.503(b) (NESHAP/MACT) or 40 CFR 63.425(a) (New Source Performance Standards) requirements, a reading equal to or greater than twenty-one thousand (21,000) parts per million as propane, from all points on the perimeter of a potential leak source when measured by the method referenced in 40 CFR 60, Appendix A, Method 21, or an equivalent procedure approved by the commissioner during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and
    - (C) avoidable visible liquid leaks during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and
  - (2) within fifteen (15) days, repair and retest a vapor balance, collection, or control system that exceeds the limits in subdivision (1).
- (d) The department may, at any time, monitor a gasoline transport, vapor balance, or vapor control system to confirm continuing compliance with subsection (a) or (b).
- (e) If the commissioner allows alternative test procedures in subsection (a)(1) or (c)(1)(B), such method shall be submitted to the U.S. EPA as a SIP revision.
- (f) During compliance tests conducted under 326 IAC 3-6 (stack testing), each vapor balance or control system shall be tested applying the standards described in subsection (c)(1)(B). Testers shall use 40 CFR 60, Appendix A, Method 21 to determine if there are any leaks from the hatches and the flanges of the gasoline transports. If any leak is detected, the transport cannot be used for the capacity of the compliance test of the bulk gas terminal. The threshold for leaks shall be as follows:
  - (1) Five hundred (500) parts per million methane for all bulk gas terminals subject to NESHAP/MACT (40 CFR 63, Subpart R).

- (2) Ten thousand (10,000) parts per million methane for all bulk gas terminals subject to a New Source Performance Standard.

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

---

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

### Compliance Determination Requirements

#### D.1.5 VOC and HAP

---

In order to comply with Conditions D.1.1, and D.1.3, the carbon adsorber vapor recovery unit, or one (1) of the three (3) available backup trailer mounted vapor combustor for VOC and HAP control shall be in operation and control emissions from the loading rack at all times that the rack is in operation loading gasoline.

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

---

- (a) To demonstrate compliance with Condition D.1.1(a), a compliance stack test shall be performed within five (5) years from the date of the most recent valid compliance demonstration, at the exhaust of the carbon adsorber vapor recovery unit. This test shall be performed according to 40 CFR 60, Appendix A, Methods 25 and 25A.
- (b) If the commissioner allows alternative test procedures, such method shall be submitted to the U.S. EPA as a SIP revision.
- (c) During compliance tests conducted under 326 IAC 3-6 (stack testing), each vapor balance or control system shall be tested applying the standards described in 40 CFR Part 60 Subpart XX. Testers shall use 40 CFR 60, Appendix A, Method 21 to determine if there are any leaks from the hatches and the flanges of the gasoline transports. If any leak is detected, the transport cannot be used for the capacity of the compliance test of the bulk gas terminal. The threshold for leaks shall be as follows:
  - (1) Five hundred (500) parts per million methane for all bulk gas terminals subject to NESHAP/MACT (40 CFR 63, Subpart R).
  - (2) Ten thousand (10,000) parts per million methane for all bulk gas terminals subject to a New Source Performance Standard.

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

#### D.1.7 Carbon Adsorber

---

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

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

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

### **D.1.8 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.1.1(a), the Permittee shall maintain records at the source of the volume in gallons of each fuel received at the loading rack, including purchase orders and invoices necessary to verify the type and amount used;
- (b) To document compliance with D.1.3(f), the owner or operator of a vapor balance or vapor control system subject to this section shall maintain records of all compliance testing. The records shall identify the following:
  - (1) The vapor balance, vapor collection, or vapor control system.
  - (2) The date of the test and, if applicable, retest.
  - (3) The results of the test and, if applicable, retest.

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

- (c) To document compliance with Condition D.1.3(a), the owner or operator of a gasoline transport subject to this section shall keep a legible copy of the transport's most recent valid annual modified 40 CFR 60, Appendix A, Method 27 test either in the cab of the transport or affixed to the transport trailer. The test record shall identify the following:
  - (1) The gasoline transport.
  - (2) The type and date of the test and, if applicable, date of retest.
  - (3) The test methods, test data, and results certified as true, accurate, and in compliance with this rule by the person who performs the test.

This copy shall be made available immediately upon request to the department and to the owner of the loading facility for inspection and review. The department shall be allowed to make copies of the test results.

- (d) To document compliance with Condition D.1.7, the Permittee shall maintain records of the following operation parameters of the carbon adsorber vapor recovery unit:
  - (1) bed pressure; and
  - (2) vacuum level.

### **D.1.9 Reporting Requirements**

---

A quarterly summary of the information to document compliance with Conditions 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 period being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## **New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]**

### **D.1.10 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]**

---

Pursuant to 40 CFR 60.500, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, except when otherwise specified in 40 CFR Part 60, Subpart XX.

D.1.11 New Source Performance Standards (NSPS) Standards of Performance for Bulk Gasoline Terminals [326 IAC 12][40 CFR Part 60, Subpart XX]

---

The Permittee which operates a bulk gasoline terminal loading rack 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 (a) and (b)
- (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

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emission Unit Description [326 IAC 2-8-4 (10)]

- (b) Storage tank # 1, equipped with a fixed roof, 1,365,000 gallons storage capacity, used to store HS diesel, and constructed in 1941.
- (c) Storage tank #2, equipped with an external pontoon floating roof with a dome, 672,000 gallon storage capacity, used to store Slop interface, and constructed in 1940.
- (d) Storage tank #3, equipped with an external pontoon floating roof with a dome, 672,000 gallon storage capacity, used to store ethanol, and constructed in 1941.
- (e) Storage tank # 4, equipped with a fixed roof, 1,365,000 gallon storage capacity, used to store LS diesel supreme, and constructed in 1941.
- (f) Storage tank # 5, equipped with a fixed roof, 1,365,000 gallon storage capacity, used to store Kerosene, and constructed in 1941.
- (g) Storage tank #6, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store Subgrade/regular gasoline, and constructed in 1941.
- (h) Storage tank #7, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store Subgrade/ regular gasoline, and constructed in 1941.
- (i) Storage tank #8, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store Premium gasoline, and constructed in 1942.
- (j) Storage tank # 10, equipped with a fixed roof, 92,400 gallon storage capacity, used to store diesel, and constructed in 1941.
- (k) Storage tank # 11, equipped with a fixed roof, 3,360,000 gallon storage capacity, used to store LS diesel, and constructed in 1970.

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

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

#### D.2.1 Volatile Organic Compounds [326 IAC 8-4-3]

Pursuant to 326 IAC 8-4-3, storage tanks 1, 2, 3, 4, 5, 6, 7, 8, 10 and 11 shall meet the following requirements:

- (a) The tanks shall be 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 tanks shall be 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, shall be 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 supporters; 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.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

---

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

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

**D.2.3 Monitoring**

---

The Permittee shall conduct a quarterly inspection of storage tanks 1, 2, 3, 4, 5, 6, 7, 8, 10 and 11 for visible holes, tears, or other openings in the seal or any seal fabric or materials. The inspections required in this condition can be conducted through roof hatches.

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

**D.2.4 Record Keeping Requirements [326 IAC 8-4-3(d)]**

---

- (a) To document compliance with Condition D.2.1(b), the Permittee shall maintain records of results of the quarterly inspections required in conditions D.2.3.
- (b) Pursuant to 326 IAC 8-4-3(d), the Permittee of storage tanks 1, 2, 3, 4, 5, 6, 7, 8, 10 and 11 shall maintain the following records:
  - (1) petroleum liquid stored,
  - (2) the period of storage, and
  - (3) the maximum true vapor pressure of that liquid during the respective storage period.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3 EMISSION UNIT OPERATION CONDITION

Insignificant emitting activities consisting of the following:

- (a) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight. [326 IAC 6-2-4]
- (p) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

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

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

#### D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility existing prior to January 1, 1980 shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38<sup>o</sup>C) (one hundred degrees Fahrenheit (100<sup>o</sup>F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9<sup>o</sup>C) (one hundred twenty degrees Fahrenheit (120<sup>o</sup>F):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.3.3 Particular Emission Limitations for Sources of Indirect Heating (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from four (4) oil fired boilers, with a total source maximum operating capacity of 0.913 mmBtu/hr shall be limited to 0.6 pounds per mmBtu.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

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

Source Name: BP Products North America Inc. Indianapolis Terminal  
Source Address: 2500 N. Tibbs, Indianapolis, Indiana 46222  
Mailing Address: 150 W. Warrenville Rd. Bldg. 502, 1225, Naperville, IL 60563  
FESOP Permit No.: F097-25559-00076

**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 AND ENFORCEMENT 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 Inc. Indianapolis Terminal  
Source Address: 2500 N. Tibbs, Indianapolis, Indiana 46222  
Mailing Address: 150 W. Warrenville Rd. Bldg. 502, 1225, Naperville, IL 60563  
FESOP Permit No.: F097-25559-00076

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, 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 <input type="checkbox"/> N <input type="checkbox"/> Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

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

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

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

A certification is not required for this report.

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

**FESOP Quarterly Report**

Source Name: BP Products North America Inc. Indianapolis Terminal  
 Source Address: 2500 N. Tibbs, Indianapolis, Indiana 46222  
 Mailing Address: 150 W. Warrenville Rd. Bldg. 502, 1225, Naperville, IL 60563  
 FESOP Permit No.: F097-25559-00076  
 Facility: Loading Rack  
 Parameter: Monthly Throughput to Loading Rack  
 Limit: The amount of gasoline and distillate oil product loaded at the Loading Rack are limited to less than 400,000,000 gallons per 12 consecutive month period and 270,000,000 gallons per 12 consecutive month period, respectively.

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

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
	gasoline	distillate	gasoline	distillate	gasoline	distillate
Month 1						
Month 2						
Month 3						

- 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 Inc. Indianapolis Terminal  
 Source Address: 2500 N. Tibbs, Indianapolis, Indiana 46222  
 Mailing Address: 150 W. Warrenville Rd. Bldg. 502, 1225, Naperville, IL 60563  
 FESOP Permit No.: F097-25559-00076

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

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked <b>ΔNo deviations occurred this reporting period@.</b></p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

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

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

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

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

Attach a signed certification to complete this report.

## **ATTACHMENT A**

### **40 CFR Part 60 Subpart XX New Source Performance Standards for Bulk Gasoline Terminals**

## **Subpart XX—Standards of Performance for Bulk Gasoline Terminals**

**Source:** 48 FR 37590, Aug. 18, 1983, unless otherwise noted.

§ 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.

[48 FR 37590, Aug. 18, 1983, as amended at 65 FR 61763, Oct. 17, 2000; 68 FR 70965, Dec. 19, 2003]

§ 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,  $1.83 \times 10^6$  for propane and  $2.41 \times 10^6$  for butane, mg/scm.

(4) The performance test shall be conducted in intervals of 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  $\pm 2.5$  mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck.

(2) During the performance test, the pressure shall be recorded every 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).

**[54 FR 6678, Feb. 14, 1989; 54 FR 21344, Feb. 14, 1989, as amended at 68 FR 70965, Dec. 19, 2003]**

§ 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

## Addendum to the Technical Support Document for a Federally Enforceable State Operating Permit Renewal

<b>Source Name:</b>	BP Products North America Inc. - Indianapolis Terminal
<b>Source Location:</b>	2500 North Tibbs Avenue, Indianapolis, IN 46222
<b>County:</b>	Marion
<b>SIC Code:</b>	5171
<b>Permit Renewal No.:</b>	F097-25559-00076
<b>Permit Reviewer:</b>	Jeffrey Hege / Alfred C Dumaul.

On February 19, 2009, the Office of Air Quality (OAQ) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that BP Products North America Incorporated - Indianapolis Terminal (BP) had proposed to renew a Federally Enforceable State Operating Permit (FESOP) to operate a petroleum product loading terminal. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, OAQ has decided to make the following changes to the FESOP Renewal. The TSD will remain as it originally appeared when published. Changes to the permit or technical support material that occur after the permit has published for public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. **Bolded** language has been added and the language with ~~strikeout~~ has been deleted.

The changes to the FESOP Renewal are as follows:

### Change 1

Several of IDEM's Branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to Permit Administration and Development Section and the Permits Branch have been changed to Permit Administration and Support Section. References to Asbestos Section, Compliance Data Section, Air Compliance Section, and Compliance Branch have been changed to Compliance and Enforcement Branch.

Indiana Department of Environmental Management  
**Permit Administration and Support Section**, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

Change 2:

Condition B.20 of the permit has been amended as follows:

**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.~~

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

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

**Source Background and Description**

<b>Source Name:</b>	BP Products North America Inc. - Indianapolis Terminal
<b>Source Location:</b>	2500 North Tibbs Avenue, Indianapolis, IN 46222
<b>County:</b>	Marion
<b>SIC Code:</b>	5171
<b>Permit Renewal No.:</b>	F097-25559-00076
<b>Permit Reviewer:</b>	Jeffrey Hege / Alfred C Dumaul

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from BP Products North America Inc. - Indianapolis Terminal relating to the operation of a petroleum product loading terminal.

**History**

On November 13, 2007, BP Products North America Incorporated - Indianapolis Terminal (BP) submitted an application to the OAQ requesting to renew its operating permit. BP was issued a FESOP Renewal, F097-15203-00076, on August 13, 2003. On November 24, 2003, BP was issued its First Significant Permit Revision permit number 097-18167-00076, to remove HAP limits and recordkeeping and reporting requirements associated with the HAP limits. On July 19, 2004, the First Administrative Amendment, AA 097-19412-00076, was issued to remove the emission statement and reporting requirements. On December 20, 2005, a Second Administrative Amendment, AA 097-21524-00076, was issued for the addition of a new 8,000 gallon additive tank (Tank # 24) as an insignificant activity. On April 6, 2006 the Third Administrative Amendment, AA 097-22849-00076, was issued to include the addition of a new 350 gallon additive tank (Tank # 25) as an insignificant activity.

**Permitted Emission Units and Pollution Control Equipment**

- (a) One (1) loading rack for dispensing of petroleum product, with one (1) carbon adsorber, identified as V10, for control of volatile organic compounds. Loading rack installed in 1993.  
  
Under the Standards of Performance for Bulk Gasoline Terminals (40 CFR Part 60, Subpart XX), the petroleum products loading rack is an affected facility.
- (b) Storage tank # 1, equipped with a fixed roof, 1,365,000 gallons storage capacity, used to store HS diesel, and constructed in 1941.
- (c) Storage tank #2, equipped with an external pontoon floating roof with a dome, 672,000 gallon storage capacity, used to store slop interface, and constructed in 1940.
- (d) Storage tank #3, equipped with an external pontoon floating roof with a dome, 672,000 gallon storage capacity, used to store ethanol, and constructed in 1941.
- (e) Storage tank # 4, equipped with a fixed roof, 1,365,000 gallon storage capacity, used to store LS diesel supreme, and constructed in 1941.

- (f) Storage tank # 5, equipped with a fixed roof, 1,365,000 gallon storage capacity, used to store Kerosene, and constructed in 1941.
- (g) Storage tank #6, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store Subgrade/regular gasoline, and constructed in 1941.
- (h) Storage tank #7, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store Subgrade/ regular gasoline, and constructed in 1941.
- (i) Storage tank #8, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store Premium gasoline, and constructed in 1942.
- (j) Storage tank # 10, equipped with a fixed roof, 92,400 gallon storage capacity, used to store diesel, and constructed in 1941.
- (k) Storage tank # 11, equipped with a fixed roof, 3,360,000 gallon storage capacity, used to store LS diesel, and constructed in 1970.

### **Insignificant Activities**

- (a) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight. [326 IAC 6-2-4]
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluid.
- (e) Filling drums, pails or other packaging containers with lubricating oils, waxes, and grease.
- (f) Cleaners and solvents characterized as follows:
  - (1) having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100 °F) or ;
  - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20 degrees C (68 °F);
- (g) Groundwater oil recovery wells.
- (h) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (i) Process vessels degassing and cleaning to prepare for internal repair.
- (j) Paved and unpaved roads and parking lots with public access.

- (k) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (l) On-site fire and emergency response training approved by the department.
- (m) Filter or coalescer media changeout.
- (n) Laboratory as defined in 326 IAC 2-7-1(21)(D)
- (o) The following facilities with VOC emissions less than 3 pounds per hour or fifteen pounds per day which are not specified in form GSD10(a) of the application:
  - (1) Tank 12, 8,000 gallon diesel tank
  - (2) Tank 13, 1,000 gallon gasoline tank
  - (3) Tank 14, Oil/water separator
  - (4) Tank 14a, 6000 gallon underground storage tank
  - (4) Tank 15, 2,000 gallon pumpoff tank
  - (5) Tank 16, 1,100 gallon heater oil tank for shop
  - (6) Tank 17, 8,000 gallon UST
  - (7) Tank 18, 1,000 gallon furnace oil UST
  - (8) Tank 19, 500 gallon oil recycling tank
  - (9) Tank 20, 8,200 gallon OGA additive tank
  - (10) Tank 21, 2,000 gallon VRU knock out tank
  - (11) Tank 22, 1,000 gallon ground water tank
  - (12) Tank 23, 1,000 gallon oil recovery tank
  - (13) Tank 24, 8,000 gallon additive tank
  - (14) Tank 25, 700 gallon additive tank
  - (15) Tank 26, 350 gallon additive tank
  - (16) Tank 27, 1,000 gallon oil recovery tank
  - (17) Air Stripper
  - (18) Other Miscellaneous Activities (loading, refueling, lab and maintenance)
- (p) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

### Existing Approvals

Since the issuance of the FESOP Renewal, F097-15203-00076, on August 13, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) First Significant Permit Revision No. 097-18167-00076 issued on November 24, 2003;
- (b) First Administrative Amendment No. 097-19412-00076 issued on July 19, 2004;
- (c) Second Administrative Amendment No. 097-21524-00076 issued on December 20, 2005; and
- (d) Third Administrative Amendment No. 097-22849-00076 issued on April 6, 2006;

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 Marion County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 <sup>th</sup> Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O <sub>3</sub>	Attainment effective November 8, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM-10	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
<sup>1</sup> Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion 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 designation was revoked effective June 15, 2005. Basic Nonattainment effective April 5, 2005 for PM-2.5.	

(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 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.
- (3) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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 NOx emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM-2.5

Marion County has been classified as nonattainment for PM-2.5 in 70 FR 943 dated January 5, 2005. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM-2.5 emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM-2.5 and SO<sub>2</sub> emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

- (c) **Other Criteria Pollutants**  
Marion County has been classified as attainment or unclassifiable in Indiana for SO<sub>2</sub>, CO, PM-10, NO<sub>2</sub> 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 in one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are counted toward the determination of PSD applicability.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	negl.
PM-10	negl.
SO <sub>2</sub>	negl.
VOC	1639.73
CO	negl.
NO <sub>x</sub>	negl.

HAP	PTE (tons/year)
Hexane	60.73
Benzene	6.11
Toluene	12.41
ISO Octane	11.96
Xylenes	3.91
Ethylbenzene	0.36
Naphthalene	0.12
TOTAL HAPs	97.16

- (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 greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is greater than twenty-five (25) tons per year. However, the source has agreed to limit their HAP emissions to less than Title V levels, therefore the source will be issued a FESOP.
- (d) **Fugitive Emissions**  
Since this source is classified as a "petroleum storage and transfer facility with a total storage capacity exceeding three hundred thousand (300,000) barrels," it is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2. Therefore, fugitive emissions are counted toward the determination of PSD applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 2005 STEPS OAQ and OES emission data.

Pollutant	Actual Emissions (tons/year)
PM	negl.
PM-10	negl.
SO <sub>2</sub>	negl.
VOC	17.01
CO	negl.
NO <sub>x</sub>	negl.
HAP	negl.

**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.

Potential to Emit After Issuance (tons/year)								
Process/emission unit	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs single	HAPs combination
Gasoline tanks (3, 6, 7 and 8)	negl.	negl.	negl.	2.19	negl.	negl.	0.10	0.15
Distillate Tanks (1, 4, 5, 10 and 11)	negl.	negl.	negl.	2.66	negl.	negl.	negl.	0.01
Slop Tank (2)	negl.	negl.	negl.	0.41	negl.	negl.	negl.	negl.
Fugitive for loading rack - Gasoline	negl.	negl.	negl.	15.00	negl.	negl.	0.57	0.90
Fugitive for loading rack - Distillate	negl.	negl.	negl.	2.70	negl.	negl.	negl.	negl.
loading Rack V10	negl.	negl.	negl.	58.41	negl.	negl.	2.21	3.49
Insignificant Emitting Activities	0.06	0.06	2.03	10.24	0.14	0.57	0.39	0.61
Total PTE After Issuance	0.06	0.06	2.03	91.61	0.14	0.57	3.27	5.17

**Federal Rule Applicability**

The following federal rules are applicable to the source:

**New Source Performance Standard (NSPS)**

- (a) The petroleum loading rack is subject to the New Source Performance Standard, 326 IAC 12, and 40 CFR Part 60.500, Subpart XX since this source was constructed after December 17, 1980. Pursuant to the requirements of this regulation the VOC emissions are limited to 35 milligrams per liter of gasoline loaded.

The loading rack is subject to the following portions of Subpart XX.

- (1) 40 CFR 60.500 (a) and (b)
- (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

The provisions of 40 CFR 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12, apply to the loading rack, except when otherwise specified in 40 CFR 60 Subpart XX.

- (b) None of the storage tanks at this facility are subject to any the New Source Performance Standards, 326 IAC 12 (40 CFR Part 60 Subparts K, Ka, or Kb), because they were constructed prior to the date of construction in each of the applicability requirements.
- (c) The Insignificant Boilers are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60), Subpart Dc because their capacities are each less than 10 mmBtu per hour.
- (d) There are no other New Source Performance Standards (NSPS) (40 CFR Part 60) included in the renewal.

#### **National Emission Standards for Hazardous Air Pollutants (NESHAP)**

- (e) This source is not subject to the Gasoline Terminal MACT standard, 326 IAC 20-10 (40 CFR Part 63, Subpart R), since the result of the screening factor equation is less than 1. In addition to this, the VOC limits effectively limit the HAP emissions below the major source thresholds (see emissions calculation in Appendix A).
- (f) This source is not subject to the NESHAP for Halogenated Solvent Cleaning, 326 IAC 20-6 (40 CFR 63, Subpart T) because the degreasing operations do not use a halogenated solvent.
- (g) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the Renewal.

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

##### **326 IAC 1-5-2 (Emergency Reduction Plans)**

The source had submitted an Emergency Reduction Plan (ERP) on January 4, 1989. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

##### **326 IAC 2-1.1-5 (Nonattainment New Source Review)**

Marion County has been classified as nonattainment for PM-2.5 in 70 FR 943 dated January 5, 2005. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM-2.5 emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM-2.5 and SO<sub>2</sub> emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. This existing source is not a major stationary source, under Nonattainment New Source Review (326 IAC 2-1.1-5), because the potential to emit of PM-2.5 and SO<sub>2</sub> are less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.

### 326 IAC 2-2 (PSD)

BP Products North America Inc. - Indianapolis Terminal, which is one of the 28 listed source categories under 326 IAC 2-2, is not a major stationary source because no regulated pollutant emissions are equal to or greater than one hundred (100) tons per year (see section on 326 IAC 2-8 for VOC limit discussion). There have been no modifications or revisions to this source that were major modifications pursuant to 326 IAC 2-2. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) is not applicable to this source.

### 326 IAC 2-4.1-1 (New Source Toxics Control)

The limited potential to emit of Hazardous Air Pollutants from this source is less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

This source is located in Marion County, is not required to obtain a Part 70 permit, and does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year. Therefore, 326 IAC 2-6 does not apply.

### 326 IAC 2-8 (FESOP)

Pursuant to this rule, the amount of volatile organic compounds emitted are limited to less than 100 tons per year, the amount of any single HAP emitted is limited to less than 10 tons per year, and the amount of any combination of HAPs emitted is limited to less than 25 tons per year. To comply with these limits, BP Products North America Inc. - Indianapolis Terminal has accepted the following conditions:

- (a) The VOC emissions from the vapor recovery unit on the loading rack shall not exceed 35 milligrams per liter of gasoline loaded (0.292 lbs per 1000 gals).
- (b) The amount of gasoline and distillate oil product loaded at the loading rack are limited to less than 400,000,000 gallons per 12 consecutive month period and 270,000,000 gallons per 12 consecutive month period, respectively, with compliance determined at the end of each month.
- (c) The highest single HAP emissions from the vapor recovery unit on the loading rack shall not exceed 2.14 pounds per hour.
- (d) The total combined HAPs emissions from the vapor recovery unit on the loading rack shall not exceed 5.35 pounds per hour.

Compliance with these limitations will limit the VOC and HAP emissions from the loading rack such that the source-wide VOC emissions are less than 100 tons per consecutive 12 month period, and the HAP emissions are less than 10 tons for any single HAP and less than 25 tons for total combined HAP, and will make the requirements of 326 IAC 2-7 and 40 CFR 63.420 (Subpart R) not applicable.

### 326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of 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 Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

Pursuant to 326 IAC 6-4, the source shall not generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

### 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to 326 IAC 6-5 for fugitive particulate matter emissions because no facility emits fugitive particulate matter at this source.

### 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

This source is not subject to the requirements of 326 IAC 6.5 because it is not specifically listed in 326 IAC 6.5-6, the source does not have the potential to emit one hundred (100) tons or more of particulate matter per year, and the source does not have actual emissions of ten (10) tons or more of particulate matter per year.

## State Rule Applicability - Individual Facilities

### 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The source is subject to the provisions of 326 IAC 6-2-1(d) because it is located in Marion County and the Insignificant Activity oil fired boilers (each with heat input less than 10 mmBtu/hr) were constructed between 2000 and 2004, which is after the applicability date of September 21, 1983. Pursuant to 326 IAC 6-2-4, particulate emissions from indirect heating facilities shall be limited by the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input  
Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used. For Q less than 10 mmBtu/hr, Pt shall not exceed 0.6.

Since Q for all the boilers at the facility combined is less than 10 mmBtu/hr (0.913 mmBtu/hr) particulate emissions from each of the boilers shall be limited to 0.6 lb/mmBtu.

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

This rule applies to this source because it is located in Marion county and has petroleum liquid storage vessels with capacities greater than one hundred fifty thousand (150,000) liters (thirty-nine thousand (39,000) gallons) containing volatile organic compounds whose true vapor pressure is greater than 10.5 kPa (1.52 psi). Therefore, pursuant to 326 IAC 8-4-3, storage tanks 1, 2, 3, 4, 5, 6, 7, 8, 10 and 11 shall meet the following requirements:

- (a) The tanks shall be 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 tanks shall be 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, shall be 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 supporters; 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)

This source is subject to the requirements of 326 IAC 8-4-4 because the carbon adsorber was installed after January 1, 1980, and the source loads gasoline into trucks and therefore must control VOC emissions with an adsorber or thermal incinerator. This rule requires that:

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

The gasoline loading rack with vapor control complies with this rule.

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

Pursuant to 326 IAC 8-4-7, the permittee shall be responsible to insure that the Vapor Recovery Unit (V10) is connected to all transports and that the owners of all transports loading at the terminal shall comply with this rule.

#### 326 IAC 8-4-9 (Leaks from Transports and VRU)

The source is subject to the requirements of 326 IAC 8-4-9 because the source operates a vapor control system therefore the source shall meet the following requirements. These requirements are as follows:

- (a) No person shall allow a gasoline transport that is subject to this rule and that has a capacity of two thousand (2,000) gallons or more to be filled or emptied unless the gasoline transport completes the following:
  - (1) Annual leak detection testing before the end of the twelfth calendar month following the previous year's test, according to test procedures contained in 40 CFR 63.425 (e), as follows:
    - (A) Conduct the pressure and vacuum tests for the transport's cargo tank using a time period of five (5) minutes. The initial pressure for the pressure test shall be four hundred sixty (460) millimeters H<sub>2</sub>O (eighteen (18) inches H<sub>2</sub>O) gauge. The initial vacuum for the vacuum test shall be one hundred fifty (150) millimeters H<sub>2</sub>O (six (6) inches H<sub>2</sub>O) gauge. The maximum allowable pressure or vacuum change is twenty-five (25) millimeters H<sub>2</sub>O (one (1) inch H<sub>2</sub>O) in five (5) minutes.
    - (B) Conduct the pressure test of the cargo tank's internal vapor valve as follows:
      - (i) After completing the test under clause (A), use the procedures in 40 CFR 60, Appendix A, Method 27 to repressurize the tank to four hundred sixty (460) millimeters H<sub>2</sub>O (eighteen (18) inches H<sub>2</sub>O) gauge. Close the transport's internal vapor valve or valves, thereby isolating the vapor return line and manifold from the tank.
      - (ii) Relieve the pressure in the vapor return line to atmospheric pressure, then reseal the line. After five (5) minutes, record the gauge pressure in the vapor return line and manifold. The maximum allowable five (5) minute pressure increase is one hundred thirty (130) millimeters H<sub>2</sub>O (five (5) inches H<sub>2</sub>O).
  - (2) Repairs by the gasoline transport owner or operator, if the transport does not meet the criteria of subdivision (1), and retesting to prove compliance with the criteria of subdivision (1).
- (b) The annual test data remain valid until the end of the twelfth calendar month following the test. The owner of the gasoline transport shall be responsible for compliance with subsection (b) and shall provide the owner of the loading facility with the most recent valid modified 40 CFR 60, Appendix A, Method 27 test results upon request. The owner of the loading facility shall take all reasonable steps, including reviewing the test date and tester's signature, to ensure that gasoline transports loading at its facility comply with subsection (a).
- (c) The owner or operator of a vapor balance system or vapor control system subject to this rule shall:
  - (1) design and operate the applicable system and the gasoline loading equipment in a manner that prevents:
    - (A) gauge pressure from exceeding four thousand five hundred (4,500) pascals (eighteen (18) inches of H<sub>2</sub>O) and a vacuum from exceeding one thousand five hundred (1,500) pascals (six (6) inches of H<sub>2</sub>O) in the gasoline transport;

- (B) except for sources subject to 40 CFR 60.503(b) (New Source Performance Standards) or 40 CFR 63. 425(a) (NESHAP/MACT) requirements, a reading equal to or greater than twenty-one thousand (21,000) parts per million as propane, from all points on the perimeter of a potential leak source when measured by the method referenced in 40 CFR 60, Appendix A, Method 21, or an equivalent procedure approved by the commissioner during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and
  - (C) avoidable visible liquid leaks during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals;
- (2) within fifteen (15) days, repair and retest a vapor balance, collection, or control system that exceeds the limits in subdivision (1).
- (d) The department may, at any time, monitor a gasoline transport, vapor balance, or vapor control system to confirm continuing compliance with subsection (a) or (b).
  - (e) The owner or operator of a vapor balance or vapor control system subject to this section shall maintain records of all certification testing. The records shall identify the following:
    - (1) The vapor balance, vapor collection, or vapor control system.
    - (2) The date of the test and, if applicable, retest.
    - (3) The results of the test and, if applicable, retest.

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

- (f) The owner or operator of a gasoline transport subject to this section shall keep a legible copy of the transport's most recent valid annual modified 40 CFR 60, Appendix A, Method 27 test either in the cab of the transport or affixed to the transport trailer. The test record shall identify the following:
  - (1) The gasoline transport.
  - (2) The type and date of the test and, if applicable, date of retest.
  - (3) The test methods, test data, and results certified as true, accurate, and in compliance with this rule by the person who performs the test.

This copy shall be made available immediately upon request to the department and to the owner of the loading facility for inspection and review. The department shall be allowed to make copies of the test results.

- (g) If the commissioner allows alternative test procedures in subsection (a)(1) or (c)(1)(B), such method shall be submitted to the U.S. EPA as a SIP revision.
- (h) During compliance tests conducted under 326 IAC 3-6 (stack testing), each vapor balance or control system shall be tested applying the standards described in subsection (c)(1)(B). Testers shall use 40 CFR 60, Appendix A, Method 21 to determine if there are any leaks from the hatches and the flanges of the gasoline transports. If any leak is detected, the transport cannot be used for the capacity of the compliance test of the bulk gas terminal. The threshold for leaks shall be as follows:

- (1) Five hundred (500) parts per million methane for all bulk gas terminals subject to NESHAP/MACT (40 CFR 63, Subpart R).
- (2) Ten thousand (10,000) parts per million methane for all bulk gas terminals subject to a New Source Performance Standard.

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

These storage vessels are not located in the counties listed under 326 IAC 8-9-1 (a). Therefore, 8-9 does not apply.

### **State Applicable Rules for Insignificant Emitting Activities**

#### 326 IAC 8-3-2 (Cold Cleaner operations)

The source is an existing facility as of January 1, 1980, which performs organic solvent degreasing operations located in Marion and has the potential emit ninety and seven-tenths (90.7) megagrams (one hundred (100) tons) or greater per year of VOC therefore pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### 326 IAC 8-3-5 (Volatile Organic Compound Rules: Cold Cleaner Degreaser Operation and Control)

Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38<sup>o</sup>C) (one hundred degrees Fahrenheit (100<sup>o</sup>F));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38<sup>o</sup>C) (one hundred degrees Fahrenheit (100<sup>o</sup>F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

### Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

The compliance determination requirements applicable to the operation of the vapor recovery unit are as follows:

- (a) The vapor recovery unit shall be in operation and control emissions from the Loading Rack at all times the Loading Rack is in operation.
- (b) A compliance stack test shall be performed five (5) years from the date of the most recent valid compliance demonstration, at the exhaust of the carbon adsorber vapor recovery unit. Testing shall be conducted in accordance with Section C - Performance Testing.

The compliance monitoring requirements applicable to the operation of the vapor recovery unit are as follows:

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

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

These monitoring conditions are necessary to insure continuous compliance with 326 IAC 2-8-4, 326 IAC 8-4-3 and 326 IAC 8-4-4.

The compliance monitoring requirements applicable to the operation of tanks 1, 2, 3, 4, 5, 6, 7, 8, 10 and 11 are as follows:

- (a) The Permittee shall conduct a quarterly inspection of storage tanks 1, 2, 3, 4, 5, 6, 7, 8, 10 and 11 for visible holes, tears, or other openings in the seal or any seal fabric or materials. The inspections required in this condition can be conducted through roof hatches.

### **Recommendation**

The staff recommends to the Commissioner that the FESOP Renewal, F097-25559-00076, 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 13, 2007. Additional information was received on March 10, 2008 and October 27, 2008.

### **Conclusion**

The operation of this petroleum product loading terminal shall be subject to the conditions of the attached FESOP Renewal No: F097-25559-00076.

**Appendix A: Emissions Calculations  
Source Wide Emissions**

**Company Name:** BP Products North America Inc. - Indianapolis Terminal  
**Address City IN Zip:** 2500 N. Tibbs Indianapolis 46222  
**Permit Number:** F097-25559-00076  
**Reviewer:** Jeffrey Hege / Alfred C Dumaul  
**Date:** 11/24/2008

<b>Facilities</b>	<b>Limited PTE for VOC</b>	<b>Potential Emissions of VOC (tons/yr)</b>	<b>Limited PTE for a single HAP (tons/yr)</b>	<b>Potential Emissions of a single HAP (tons/yr)</b>	<b>Limited PTE for any combination of HAPs (tons/yr)</b>	<b>Potential Emissions for any combination of HAPs (tons/yr)</b>
Gasoline tanks (3,6,7 and 8)	2.19	2.51	0.10	0.10	0.15	0.15
Distillate Tanks (1,4,5, 10 and 11)	2.66	2.66	-	-	0.01	0.01
Slop Tanks (2)	0.41	3.91	-	-	-	-
Fugitive for loading rack - Gasoline	15.0	15.00	0.57	0.57	0.90	0.90
Fugitive for loading rack - Distillate	2.70	2.70	-	-	-	-
VRU outlet (35 mg/l , Gasoline throughput)	58.41	1,602.70	2.21	60.73	3.49	95.49
Other Insignificant Emitting Activities	10.24	10.24	0.39	0.39	0.61	0.61
<b>Total Emissions</b>	<b>91.61</b>	<b>1,639.73</b>	<b>3.27</b>	<b>61.79</b>	<b>5.16</b>	<b>97.16</b>

(1) The VOC emissions limit of 35 milligrams per liter of Gasoline loaded and a throughput of 400,000,000 gallons of gasoline and 270,000,000 gallons of distillate per 12 month rolling sum effectively limits the HAP emissions to below the Major source thresholds for a single HAP and any combination of HAPs.

(2) With the exception of the distillate tank (naphthalene) , the limited PTE for a single HAP (tons/yr) is for emissions of Hexane.

**Appendix A: Emissions Calculations  
Emissions From Loading Rack and VRU**

**Company Name:** BP Products North America Inc. - Indianapolis Terminal  
**Address City IN Zip:** 2500 N. Tibbs Indianapolis 46222  
**Permit Number:** F097-25559-00076  
**Reviewer:** Jeffrey Hege / Alfred C Dumaul  
**Date:** 11/24/2008

**Loading Loss Emissions Calculations**

$UE = (L/1000 \times GT)/2000$   
 $CVE = EL \text{ mg/l} \times GTG \text{ gal/yr} \times (CP \text{ lbs/mg} / CG \text{ gal/l})$   
 $DFE = ((GTD \times (Ld/1000))/2000)$   
 $GFE = ((GTG \times (Lg/1000))/2000) \times (1-CE)$

Where:

GTG = Limited throughput of gasoline per year (Permit limit, gallons per 12 month period)  
 GTD = Limited throughput of distillate & kerosene per year  
 EL = emissions limitation for VOC from the outlet of the VRU, mg/l  
 CE = capture efficiency for VOCs (see note below)  
 CG = 0.2642 gal equals 1 liter  
 CP =  $2.2046 \times 10^{-6}$  pounds equal 1 milligram  
 Lg = loading loss, pounds per 1000 gallons of gasoline loaded  
 Lk = loading loss, pounds per 1000 gallons of kerosene loaded (distillate 0.014 lbs/1000 gal) <sup>(b)</sup>

Data inputs for 12 month rolling sum

400,000,000.00
270,000,000.00
35
98.70%
0.2642
2.2046E-06
8.00
0.02

UE = uncontrolled VOC emissions tons per year (worst case all gasoline, tons/yr)  
 CVE = controlled emission rate from VRU (gasoline, tons/yr)  
 KFE = VOC emissions tons per year (kerosene, tons/yr)

1,602.70
58.41
2.70
15.00

GFE = fugitive emissions from leaks in transports and VRU (gasoline, tons/yr) <sup>(a)</sup>

Total Emissions form loading rack and VRU (tons/yr) (CVE+KFE+GFE)

76.11
-------

Pursuant to the Notice of Proposed Change to AP-42 Section 5.2, the collection efficiency for tanker trucks which meet annual pressure testing of 3 inches of water column pressure change for a five minute period when pressurized to a pressure of 6 inches of water is 98.7%

(a) Based on 9 mg/l (calculated using 0.5% as the average leakage from trucks passing the 3-inch pressure decay test (USEPA 1908: Bulk Gasoline Terminals)

(b) AP-42 Table 5.2-5 (0.0052 psia, submerged loading dedicated normal service).

**Appendix A: Emissions Calculations  
Storage Tank Emissions**

**Company Name:** BP Products North America Inc. - Indianapolis Terminal  
**Address City IN Zip:** 2500 N. Tibbs Indianapolis 46222  
**Permit Number:** F097-25559-00076  
**Reviewer:** Jeffrey Hege / Alfred C Dumaul  
**Date:** 11/24/2008

Storage Tanks ID	Product Stored	Type of Tank	Tank Volumes (gal)	Date Installed
1	Distillate	Fixed Roof	1,365,000	1941
2	Slop	Ext. Floating Roof	672,000	1942
3	Gasoline	Ext. Floating Roof	672,000	1942
4	Distillate	Fixed Roof	1,365,000	1941
5	Distillate	Fixed Roof	1,365,000	1941
6	Gasoline	Ext. Floating Roof	3,150,000	1941
7	Gasoline	Ext. Floating Roof	3,150,000	1941
8	Gasoline	Ext. Floating Roof	3,150,000	1942
10	Distillate	Fixed Roof	92,400	1941
11	Distillate	Fixed Roof	3,360,000	1970

The US EPA TANKS2 program was used to estimate the standing and withdrawal losses from each tank  
 For each Tank, the withdrawal loss was then divided by the throughput that was inputted in the TANKS2  
 program to determine the worst case unit withdrawal loss (lbs/1000 gallons)

**Gasoline Tank Information**

Storage Tanks ID	Tank Volumes (gal)	Turnovers	Throughput (Gal)	Withdrawal Loss	Withdrawal Loss Lbs/1000 gal	Standing Loss
3	672,000	37	24,864,000	78	0.003	639
6	3,150,000	37	116,550,000	183	0.002	1,043
7	3,150,000	37	116,550,000	183	0.002	1,043
8	3,150,000	37	116,550,000	183	0.002	1,043
				627		3,129

Maximum Gasoline throughput (gal/yr)	400,000,000.00
Maximum withdrawal loss (lbs/1000 gal)	0.003
Maximum emissions from Withdrawal Loss (lbs/yr)	1,254.80
Standing Loss for Gasoline, (lbs/yr)	3,129.00
Total Emissions form Gasoline (tons/yr)	2.19

**Distillate Tank Information**

Storage Tanks ID	Tank Volumes (gal)	Turnovers	Throughput (Gal)	Withdrawal Loss	Withdrawal Loss Lbs/1000 gal	Standing Loss
1	1,365,000	36	49,140,000	859	0.017	134
4	1,365,000	36	49,140,000	859	0.017	134
5	1,365,000	36	49,140,000	859	0.017	134
10	92,400	10	900,000	15	0.017	13
11	3,360,000	36	120,960,000	2,075	0.017	326
				4,667		607

Maximum distillate throughput (gal/yr)	270,000,000.00
Maximum withdrawal loss (lbs/1000 gal)	0.017
Maximum emissions from Withdrawal Loss (lbs/yr)	4,719.86
Standing Loss for Distillate, (lbs/yr)	607.00
Total Emissions form Distillate (tons/yr)	2.66

**Slop Tank Information**

Slop Storage Tank ID	Tank Volumes (gal)	Turnovers	Throughput (Gal)	Withdrawal Loss	Withdrawal Loss Lbs/1000 gal	Standing Loss
2	672,000	1.3	900,000	3	0.003	510
			total in lbs/yr	3		510

Maximum slop throughput (gal/yr)	900,000.00
Maximum withdrawal loss (lbs/1000 gal)	0.333
Maximum emissions from Withdrawal Loss (lbs/yr)	300.00
Standing Loss for Slop, (lbs/yr)	510.00
Total Emissions form Slop (tons/yr)	0.41

**Appendix A: Emissions Calculations  
Boiler Inventory**

**Company Name:** BP Products North America Inc. - Indianapolis Terminal  
**Address City IN Zip:** 2500 N. Tibbs Indianapolis 46222  
**Permit Number:** F097-25559-00076  
**Reviewer:** Jeffrey Hege / Alfred C Dumaul  
**Date:** 11/24/2008

**Boiler List**

Location	Manufacturer	Fuel Type	Date of Construction	Gallon Per Hour Input Capacity	mmBtu/hr Capacity	Fuel Sulfur Content (ppm)	Fuel Sulfur Content (%)
Machine shop	Carrier	#2 ULSD	2005	0.085 gph	0.099	15 ppm	0.0015%
Machine shop	Carrier	#2 ULSD	2005	0.085 gph	0.099	15 ppm	0.0015%
Maintenance Building	Lennox	#2 ULSD	2000	1.25 gph	0.168	15 ppm	0.0015%
Office Building	Peerless	#2 ULSD	2004	3.91 gph	0.547	15 ppm	0.0015%

The following boilers are insignificant units as per 326 IAC 2-7-1 (21)(G)(i)(AA)(cc):

*Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) British thermal units per hour and firing fuel containing equal to or less than five-tenths percent (0.5%) sulfur by weight.*

**Appendix A: Emissions Calculations  
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)  
#1 and #2 Fuel Oil**

**Company Name:** BP Products North America Inc. - Indianapolis Terminal  
**Address, City IN Zip:** 2500 N. Tibbs Indianapolis 46222  
**Permit Number:** F097-25559-00076  
**Reviewer:** Jeffrey Hege / Alfred C Dumauual  
**Date:** 11/24/2008

Total Boilers (4)  
 Heat Input Capacity MMBtu/hr  
 Potential Throughput kgals/year  
 S = Weight % Sulfur  
 0.913  
 57.13  
 0.5

Emission Factor in lb/kgal	Pollutant				
	PM*	SO2	NOx	VOC	CO
	2.0	71 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	0.057	2.028	0.571	0.010	0.143

**Methodology**

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

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

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

See next page for HAPs emission calculations.

**Appendix A: Emissions Calculations**  
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**  
**#1 and #2 Fuel Oil**  
**HAPs Emissions**

**Company Name:** BP Products North America Inc. - Indianapolis Terminal  
**Address, City IN Zip:** 2500 N. Tibbs Indianapolis 46222  
**Permit Number:** F097-25559-00076  
**Reviewer:** Jeffrey Hege / Alfred C Dumaul  
**Date:** 11/24/2008

HAPs - Metals					
Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	1.60E-05	1.20E-05	1.20E-05	1.20E-05	3.60E-05

HAPs - Metals (continued)				
Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	1.20E-05	2.40E-05	1.20E-05	6.00E-05

**Methodology**

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)\*Emission Factor (lb/mmBtu)\*8,760 hrs/yr / 2,000 lb/ton

**Appendix A: Emissions Calculations**  
**Emissions From Insignificant Emitting Activities**

**Company Name:** BP Products North America Inc. - Indianapolis  
**Address City IN Zip:** 2500 N. Tibbs Indianapolis 46222  
**Permit Number:** F097-25559-00076  
**Reviewer:** Jeffrey Hege / Alfred C Dumaul  
**Date:** 11/24/2008

Insignificant Emitting Activities	Potential Emissions (tons/yr)				
	VOC	SO2	NOx	PM	CO
Fugitive (Flanges and Valves)	0.475				
Degreasing Operation	0.5336				
Tank 12, 8,000 gallon diesel tank	0.01				
Tank 13, 1,000 gallon gasoline tank	0.01				
Tank 14, Oil/water separator	0.05				
Tank 14a, 6,000 Oil/water separator UST	0.01				
Tank 15, 2,000 gallon pumpoff tank	0.15				
Tank 16, 1,100 gallon heater oil tank for shop	0.01				
Tank 17, 8,000 gallon UST	0.01				
Tank 18, 1,000 gallon furnace oil UST	0.01				
Tank 19, 500 gallon oil recycling tank	0.05				
Tank 20, 8,200 gallon OGA additive tank	0.01				
Tank 21, 2,000 gallon Guardian additive tank	0.001				
Tank 22, 1,000 gallon Infinieum additive tank	0.0001				
Tank 27, 1,000 gallon oil recovery tank	0.15				
Tank 24, 8,000 gallon additive tank	0.01				
Tank 25, 700 gallon additive tank	0.0004				
Tank 26, 350 gallon additive tank	0.0002				
Remediation system treating contaminated groundwater	2.74				
Other loading, refueling, lab, maintenance	6.00				
TOTAL	10.24				

Appendix A: Emissions Calculations  
Source Wide HAP Inventory

Company Name: BP Products North America Inc. - Indianapolis Terminal  
Address City IN Zip: 2500 N. Tibbs Indianapolis 46222  
Permit Number: F097-25559-00076  
Reviewer: Jeffrey Hege / Alfred C Dumauual  
Date: 11/24/2008

	TOTAL VOC (tons/yr)	TOTAL VOC (lb/yr)	TOTAL HAP (tons/yr)	TOTAL HAP (lb/yr)	INDIVIDUAL HAPS (lb/yr)						
					HEXANE	BENZENE	TOLUENE	ISO-OCTANE	XYLENES	E. BENZENE	NAPHTHALENE
<b>TANK EMISSIONS</b>											
<b>GASOLINE</b>					(Gasoline Vapor HAP to VOC % by Wt.)						
					3.79%	0.38%	0.77%	0.75%	0.24%	0.02%	0.007%
Gasoline and Slop Tanks - Tanks 2, 3, 6, 7, 8	2.60	5,193.80	0.15	309.81	196.8	19.8	40.2	38.7	12.7	1.2	0.4
DIESEL	-	-	-	-	(Diesel Vapor HAP to VOC % by Wt.)						
Diesel Tanks - 1, 4, 5, 10, 11	2.66	5,326.86	0.01	29.16	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.55%
	-	-	-	-	-	-	-	0.0	-	-	29.2
<b>TANK TOTALS (lb/yr)</b>	<b>5.26</b>	<b>10,520.66</b>	<b>0.17</b>	<b>338.98</b>	<b>196.8</b>	<b>19.8</b>	<b>40.2</b>	<b>38.7</b>	<b>12.7</b>	<b>1.2</b>	<b>29.5</b>
<b>LOADRACK EMISSIONS</b>											
GASOLINE (uncontrolled)	1,602.70	3,205,400.00	95.49	190,971.32	121,463.1	12,227.4	24,828.0	23,913.2	7,814.1	725.6	232.7
GASOLINE (Controlled)	58.41	116,822.10	3.48	6,960.03	4,426.8	445.6	904.9	871.5	284.8	26.4	8.5
GASOLINE (leaking trucks)	15.00	30,000.00	0.89	1,787.34	1,136.8	114.4	232.4	223.8	73.1	6.8	2.2
DIESEL	2.70	5,400.00	-	-	-	-	-	-	-	-	29.6
<b>LOADRACK TOTALS</b>	<b>76.11</b>	<b>152,222.10</b>	<b>4.39</b>	<b>8,787.59</b>	<b>5,563.6</b>	<b>560.1</b>	<b>1,137.2</b>	<b>1,095.3</b>	<b>357.9</b>	<b>33.2</b>	<b>40.2</b>
Miscellaneous	10.24	20,484.7	0.610961	1,221.9	776.2	78.1	158.7	152.8	49.9	4.6	1.5
<b>GRAND TOTALS</b>	<b>91.61</b>	<b>183,227.4</b>	<b>5.17</b>	<b>10,348.5</b>	<b>6,536.6</b>	<b>658.0</b>	<b>1,336.1</b>	<b>1,286.9</b>	<b>420.5</b>	<b>39.0</b>	<b>71.2</b>
	<b>TPY</b>				<b>3.27</b>	<b>0.33</b>	<b>0.67</b>	<b>0.64</b>	<b>0.21</b>	<b>0.02</b>	<b>0.04</b>

NOTE:

- Although the composition of the vapor changes as it passes through the VRU, and HAPs are removed to a greater degree relative to total VOC as demonstrated in API Publication 347, this change was not accounted for in the HAP calculations, which result in a higher (conservative) HAP estimates.

**Appendix A: Emissions Calculations  
HAP Emission**

**Company Name:** BP Products North America Inc. - Indianapolis Terminal  
**Address City IN Zip:** 2500 N. Tibbs Indianapolis 46222  
**Permit Number:** F097-25559-00076  
**Reviewer:** Jeffrey Hege / Alfred C Dumauual  
**Date:** 11/24/2008

Estimated Uncontrolled HAP emissions

	HAP to VOC percentage by weight	Total VOC uncontrolled VOC emissions from Gasoline (tons/yr)
Maximum Single HAP for Normal Gasoline (Hexane)	1.60%	20.21
Maximum HAPs content for normal Gasoline	11.00%	20.21

Hexane is the largest HAP constituent by vapor weight percent (per BP MSDS for gasoline) and 11 percent represents the maximum HAP content of conventional gasoline based upon the USEPA Gasoline Distribution Industry (Stage I) - Background Information for Proposed Standards, EPA-453/R-94-002a, January 1994.

Potential to Emit HAPs

Facilities	Benzene	Toluene	Ethylbenzene	Xylene (mixed isomers)	Isopropyl benzene	Napthalene	Hexane (-n)	Isooctane	Total Emissions (lbs/Yr)	Total Emissions (Tons/Yr)
Gasoline and Slop Tanks (2, 3, 6, 7, 8)	19.81	40.23	1.18	12.66	0.00	0.38	196.81	38.75	309.81	0.15
Distillate Tanks (1, 4, 5, 10, 11)	0.00	0.00	0.00	0.00	0.00	29.16	0.00	0.00	29.16	0.01
Truck Rack Fugitives	114.44	232.37	6.79	73.13	1.78	2.18	1136.80	223.81	1791.30	0.90
VRU	445.63	904.87	26.44	284.79	8.17	8.48	4426.77	871.53	6976.68	3.49
Miscellaenous	78.14	158.67	4.64	49.94		1.49	776.23	152.82	1221.92	0.61

<b>Total (lbs/yr)</b>	<b>658.02</b>	<b>1336.13</b>	<b>39.05</b>	<b>420.52</b>	<b>9.95</b>	<b>41.68</b>	<b>6536.61</b>	<b>1286.90</b>	<b>10328.87</b>	
<b>Total (tons/yr)</b>	<b>0.33</b>	<b>0.67</b>	<b>0.02</b>	<b>0.21</b>	<b>0.00</b>	<b>0.02</b>	<b>3.27</b>	<b>0.64</b>	<b>4.7872</b>	<b>5.16</b>

Potential to emit is based on source emissions estimates based on the maximum gasoline and distillate throughput of 400,000,000 gallons per 12 month rolling sum effectively limits the HAP emissions.

Napthalene is the only HAP present in diesel fuel per BP MSDS sheet # 11155.  
 Gasoline HAP speciation based on MSDS #12632 for BP unleaded gasoline

To be conservative, assume the slop HAP speciation is equal to gasoline.