



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Governor

Thomas W. Easterly
Commissioner

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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

ConocoPhillips Pipe Line Company- East Chicago Terminal 400 East Columbus Drive East Chicago, Indiana 46312

(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. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T089-25957-00326	
Issued by:	Issuance Date:
Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Expiration Date:

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

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

Source Address:	400 East Columbus Drive, East Chicago, Indiana 46312
Mailing Address:	P.O. Box 1267, Ponca City, OK 74602-1267
General Source Phone Number:	219-397-6666
SIC Code:	5171
County Location:	Lake
Source Location Status:	Nonattainment for 8-hour ozone standard Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Major Source, under Emission Offset Rules Minor Source, under Nonattainment NSR 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 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

- (a) One (1) 813,624 gallon external floating roof gasoline storage tank, identified as T-201, with primary and secondary seals, constructed in 1939.
- (b) One (1) 653,100 gallon external floating roof gasoline storage tank, identified as T-202, with primary and secondary seals, constructed in 1939.
- (c) Two (2) 2,956,380 gallon external floating roof gasoline storage tanks, identified as T-801 and T-802, both with primary and secondary seals, both constructed in 1939.
- (d) One (1) 2,759,316 gallon external floating roof gasoline storage tank, identified as T-803, with primary and secondary seals, constructed in 1939.
- (e) One (1) 2,853,732 gallon external floating roof gasoline storage tank, identified as T-804, with primary and secondary seals, constructed in 1939.
- (f) One (1) 3,055,542 gallon external floating roof gasoline/transmix storage tank, identified as T-805, with primary and secondary seals, constructed in 1939.
- (g) One (1) 2,843,274 gallon external floating roof gasoline storage tank, identified as T-806, with primary and secondary seals, constructed in 1939.

- (h) One (1) 616,938 gallon internal floating roof gasoline storage tank, identified as T-204, with a primary seal, constructed in 1939.
- (i) One (1) 630,000 gallon internal floating roof gasoline storage tank, identified as T-207, with a primary seal, constructed in 1946.
- (j) One (1) 696,695 gallon internal floating roof gasoline/transmix (a gasoline/distillate oil mixture) storage tank, identified as T-209, with a primary seal, constructed in 1946.
- (k) One (1) 739,830 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-208, constructed in 1946.
- (l) One (1) 964,824 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-240, constructed in 1968.
- (m) One (1) 8,633,646 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2101, constructed in 1955.
- (n) One (1) 8,618,190 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2102, constructed in 1955.
- (o) One (1) 10,847,382 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2601, originally constructed in 1960 and later modified in 2002.
- (p) One (1) 10,835,328 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2602, originally constructed in 1960 and later modified in 2002.
- (q) Two (2) 635,040 gallon vertical fixed roof distillate/kerosene storage tanks, identified as T-205 and T-206, constructed in 1939.
- (r) One (1) 3,410,988 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-807, constructed in 1939.
- (s) Two (2) 15,204 gallon horizontal fixed roof gasoline additive storage tanks, identified as T-1501 and T-1502, both constructed in 1940.
- (t) One (1) 1,465,002 gallon domed internal floating roof gasoline storage tank, identified as T-401, with a primary seal, constructed in 1952.
- (u) Two (2) 2,857,890 gallon domed internal floating roof gasoline storage tanks, identified as T-809 and T-810, each with a primary seal, both constructed in 1952.
- (v) One (1) 2,841,552 gallon domed internal floating roof gasoline/transmix storage tank, identified as T-808, with a primary and seal, constructed in 1952.
- (w) Gasoline tank cleaning operation, identified as TNKCLN GAS.
- (x) One (1) tank truck loading rack (identified as RACK) used to load gasoline, distillate, and ethanol, with a maximum loading capacity of 324,000 gallons of liquid per hour, constructed in 1940 and later reconstructed in 1979, controlled by one (1) natural gas fired Vapor Combustion Unit (VCU), rated at maximum heat input rate of 1.6 MMBtu/hr, installed in 1997, and exhausting through one (1) stack identified as VCU.

- (y) One (1) VOC fractionator for separating gasoline and fuel oil of transmix tanks, identified as FRACT, venting 125 cubic feet of VOC vapor per minute during intermittent pressure relief with venting gas being controlled by VCU, and equipped with a 7.0 million British thermal units per hour natural gas fired reboiler;
- (z) VOC emissions from the following operations:
 - (1) Fugitive VOC emissions from the loading rack, identified as FLRACK.
 - (2) Filter change out service for gasoline tanks, identified as FILT1.
 - (3) Meter proving service, identified as PROVE.
- (aa) A wastewater handling and treatment system, capable of treating 420,000 gallons of contaminated water per hour, including the following activities:
 - (1) Five (5) sumps for wastewater from tank water draw and roof drains;
 - (2) One (1) sump for wastewater from loading rack;
 - (3) One (1) 379,638 gallon internal floating roof waste water/gasoline storage tank, identified as T-103, constructed in 1939;
 - (4) One (1) dissolved air floatation oil/water separator, identified as TS DAF, with a maximum capacity of 12,000 gallons per hour;
 - (5) One (1) oil/water separator, identified as TS OWS/Separator No. 1, with a maximum capacity of 11,000 gallons per hour; and
 - (6) One (1) air stripper capable of processing a maximum of 23,000 gallons of water per hour.

A.3 Specifically Regulated Insignificant Activities
[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

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

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T089-25957-00326, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, 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 2-7-7]

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 2-7-5(5)]

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 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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 the "responsible official" as defined by 326 IAC 2-7-1(34). 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 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (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 the "responsible official" 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) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (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 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.11 Emergency Provisions [326 IAC 2-7-16]

- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Facsimile Number: 317-233-6865
Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267.

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

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-4(c)(9) 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 2-7 and any other applicable rules.
 - (g) 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.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T089-25957-00326 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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 2-7-4. 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 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 Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs
[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) 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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). 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 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) 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.21 Source Modification Requirement [326 IAC 2-7-10.5]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-3.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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 Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][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) Except as provided in 326 IAC 2-7-19(e), 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.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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 2-7-5(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 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 twenty percent (20%) 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.3 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.4 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.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Fugitive Dust Emissions [326 IAC 6.8-10-3]

Pursuant to 326 IAC 6.8-10-3 (formerly 326 IAC 6-1-11.1) (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

- (a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).

- (d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
- (f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (h) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
- (i) The PM10 emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (k) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan, submitted on October 7, 2002.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-5(1)][326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification 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 2-7-5(3)] [326 IAC 2-7-6(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 2-7-5][326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures in September 2006.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [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.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
[326 IAC 2-2][326 IAC 2-3]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;

- (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-3]

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

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

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.20 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:

- (a) One (1) 813,624 gallon external floating roof gasoline storage tank, identified as T-201, with primary and secondary seals, constructed in 1939.
- (b) One (1) 653,100 gallon external floating roof gasoline storage tank, identified as T-202, with primary and secondary seals, constructed in 1939.
- (c) Two (2) 2,956,380 gallon external floating roof gasoline storage tanks, identified as T-801 and T-802, both with primary and secondary seals, both constructed in 1939.
- (d) One (1) 2,759,316 gallon external floating roof gasoline storage tank, identified as T-803, with primary and secondary seals, constructed in 1939.
- (e) One (1) 2,853,732 gallon external floating roof gasoline storage tank, identified as T-804, with primary and secondary seals, constructed in 1939.
- (f) One (1) 3,055,542 gallon external floating roof gasoline/transmix storage tank, identified as T-805, with primary and secondary seals, constructed in 1939.
- (g) One (1) 2,843,274 gallon external floating roof gasoline storage tank, identified as T-806, with primary and secondary seals, constructed in 1939.
- (h) One (1) 616,938 gallon internal floating roof gasoline storage tank, identified as T-204, with a primary seal, constructed in 1939.
- (i) One (1) 630,000 gallon internal floating roof gasoline storage tank, identified as T-207, with a primary seal, constructed in 1946.
- (j) One (1) 696,695 gallon internal floating roof gasoline/transmix (a gasoline/distillate oil mixture) storage tank, identified as T-209, with a primary seal, constructed in 1946.
- (k) One (1) 739,830 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-208, constructed in 1946.
- (l) One (1) 964,824 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-240, constructed in 1968.
- (m) One (1) 8,633,646 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2101, constructed in 1955.
- (n) One (1) 8,618,190 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2102, constructed in 1955.
- (o) One (1) 10,847,382 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2601, originally constructed in 1960 and later modified in 2002.
- (p) One (1) 10,835,328 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2602, originally constructed in 1960 and later modified in 2002.

- (q) Two (2) 635,040 gallon vertical fixed roof distillate/kerosene storage tanks, identified as T-205 and T-206, constructed in 1939.
- (r) One (1) 3,410,988 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-807, constructed in 1939.
- (s) Two (2) 15,204 gallon horizontal fixed roof gasoline additive storage tanks, identified as T-1501 and T-1502, both constructed in 1940.
- (t) One (1) 1,465,002 gallon domed internal floating roof gasoline storage tank, identified as T-401, with a primary seal, constructed in 1952.
- (u) Two (2) 2,857,890 gallon domed internal floating roof gasoline storage tanks, identified as T-809 and T-810, each with a primary seal, both constructed in 1952.
- (v) One (1) 2,841,552 gallon domed internal floating roof gasoline/transmix storage tank, identified as T-808, with a primary and seal, constructed in 1952.
- (w) Gasoline tank cleaning operation, identified as TNKCLN GAS.

(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 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-4-3]

Pursuant to 326 IAC 8-4-3, Tank Nos. T-103, T-201, T-202, T-204, T-207, T-209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809 and T-810 are subject to the following:

- (a) For External Fixed Roof Tanks
 - (1) The facility must 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 equally effective alternative control which has been approved.
 - (2) The facility is maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.
 - (3) All openings, except stub drains, are equipped with covers, lids, or seals such that:
 - (A) the cover, lid, or seal is in the closed position at all times except when in actual use;
 - (B) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;
 - (C) 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.

(b) For External Floating Roof Tanks

The owner of a facility subject to this subsection shall not store a petroleum liquid in that facility unless:

- (1) The facility has been fitted with:
 - a continuous secondary seal extending from the floating roof to the tank wall (rim-mounted secondary seal); or
 - a closure or other device approved by the commissioner which is equally effective.
- (2) All seal closure devices meet the following requirements:
 - (A) there are no visible holes, tears, or other openings in the seal(s) or seal fabric;
 - (B) the seal(s) are intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall;
 - (C) for vapor mounted primary seals, the accumulated gap area around the circumference of the secondary seal where a gap exceeding one-eighth (1/8) inch exists between the secondary seal and the tank wall shall not exceed 1.0 square inch per foot of tank diameter. There shall be no gaps exceeding one-half (1/2) inch between the secondary seal and the tank wall of welded tanks and no gaps exceeding one (1) inch between the secondary seal and the tank wall of riveted tanks.
- (3) All openings in the external floating roof, except for automatic bleeder vents, rim space vents, and leg sleeves are:
 - (A) equipped with covers, seals, or lids in the closed position except when the openings are in actual use; and
 - (B) equipped with projections into the tank which remain below the liquid surface at all times.
- (4) Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;
- (5) Rim vents are set to open when the roof is being floated off the roof leg supports or at the manufacturers recommended setting; and
- (6) Emergency roof drains are provided with slotted membrane fabric covers or equivalent covers which cover at least ninety percent (90%) of the area of the opening.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-9-4]

Pursuant to 326 IAC 8-9-4 VOC Storage tanks identified as T-103, T-201, T-202, T-204, T-207, T-209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809, T-810 are subject to this rule. Pursuant to this rule, the Permittee shall equip each tank with one (1) of the following:

- (a) At the time of the next scheduled cleaning, but not later than ten (10) years after May 1, 1996, an internal floating roof meeting the following specifications:
- (i) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
 - (ii) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
 - (A) A foam or liquid -filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid mounted seal means a foam - or liquid filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
 - (B) Two seals mounted one above the others so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor mounted, but both must be continuous.
 - (iii) Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
 - (iv) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
 - (v) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
 - (vi) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
 - (vii) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
 - (viii) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

- (ix) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- (b) At the time of the next scheduled cleaning, but not later than ten (10) years after May 1, 1996, an external floating roof meeting the following specifications:
- (i) Each external floating roof shall be equipped with a closure device between the wall of the vessel and the roof edge. The closure device shall consist of two (2) seals, one (1) above the other. The lower seal shall be referred to as the primary seal; the upper seal shall be referred to as the secondary seal.
 - (ii) Except as provided in 326 IAC 8-9-5(c)(4), the primary seal shall completely cover the annular space between the edge of the floating roof and vessel wall and shall be either a liquid-mounted seal or a shoe seal.
 - (iii) The secondary seal shall completely cover the annular space between the external floating roof and the wall of the vessel in a continuous fashion except as allowed in 326 IAC 8-9-5(c)(4).
 - (iv) Except for automatic bleeder vents and rim space vents, each opening in a noncontact external floating roof shall provide a projection below the liquid surface.
 - (v) Except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves, each opening in the roof shall be equipped with a gasketed cover, seal, or lid that shall be maintained in a closed position at all times, without visible gap, except when the device is in actual use.
 - (vi) Automatic bleeder vents shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
 - (vii) Rim vents shall be set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. Automatic bleeder vents and rim space vents shall be gasketed.
 - (viii) Each emergency roof drain shall be provided with a slotted membrane fabric cover that covers at least ninety percent (90%) of the area of the opening.
 - (ix) The roof shall be floating on the liquid at all times, for example, off the roof leg supports, except when the vessel is completely emptied and subsequently refilled. The process of filling, emptying, or refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.
- (c) At the time of the next scheduled cleaning, but not later than ten (10) years after May 1, 1996, a closed vent system and control device meeting the following specifications:
- (i) The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in

part 60, subpart VV, 40 CFR 60.485(b).

- (ii) The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. If a flare is used as the control device, it shall meet the specifications described in the general control device requirements (40 CFR 60.18) of the General Provisions.
- (d) A system equivalent to those described in paragraphs a, b and c as provided in 326 IAC 8-9-4.
- (e) The testing procedures are required under 326 IAC 8-9-5. The record keeping and reporting are required under 326 IAC 8-9-6.
- (f) On or before May 1, 1996, the Permittee of each vessel with a capacity greater than or equal to thirty-nine thousand (39,000) gallons, that stores VOL with a maximum true vapor pressure greater than or equal to eleven and one-tenth (11.1) psia shall equip each vessel with a closed vent system meeting the standards of paragraph (c).

Storage tanks, identified as T-205, T-206, T-208, T-240, T-807, T-1201, T-2102, T-2601, and T-2602 are not subject to 326 IAC 8-9-4, since each tank store VOL with a maximum true vapor pressure of less than 0.75 psia. Any change in the VOL stored with true vapor pressure of 0.75 psia or greater but less than 11.1 psia shall be subject entirely to the requirements of this condition, under 326 IAC 8-9-4.

Compliance Determination Requirements

D.1.3 Testing and Procedures [326 IAC 8-9-5]

Pursuant to 326 IAC 8-9-5 VOC Storage tanks identified as T-103, T-201, T-202, T-204, T-207, T-209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809, T-810 are subject to 326 IAC 8-9-5. Pursuant to this rule, the Permittee of each storage tank shall do the following:

- (a) Except as provided in section 326 IAC 8-9-4(a)(2), the Permittee of each vessel equipped with an internal floating roof shall meet the following requirements.
 - (1) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the Permittee shall repair the items before filling the storage vessel.
 - (2) For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator (IDEM) in the inspection report

- required in 326 IAC 8-9-6(c)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
- (3) For vessels equipped with both primary and secondary seals:
- (i) Visually inspect the vessel as specified in paragraph (4) of this section at least every 5 years; or
 - (ii) Visually inspect the vessel as specified in paragraph (2) of this section.
- (4) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the Permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (2) and (3)(ii) of this section and at intervals no greater than 5 years in the case of vessels specified in paragraph (3)(i) of this section.
- (5) Notify the Administrator (IDEM) in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs (a) and (d) of this section to afford the Administrator (IDEM) the opportunity to have an observer present. If the inspection required by paragraph (d) of this section is not planned and the Permittee could not have known about the inspection 30 days in advance or refilling the tank, the Permittee shall notify the Administrator (IDEM) at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator (IDEM) at least 7 days prior to the refilling.
- (b) Except as provided in 326 IAC 8-9-4(a)(3), the Permittee of each vessel equipped with an external floating roof shall meet the following requirements:
- (1) Determine the gap areas and maximum gap widths between the primary seal and the wall of the vessel and between the secondary seal and the wall of the vessel according to the following frequency:
 - (A) Measurements of gaps between the vessel wall and the primary seal (seal gaps) shall be performed during the hydrostatic testing of the vessel or within sixty (60) days of the initial fill with VOL and at least once every five (5) years thereafter.
 - (B) Measurements of gaps between the vessel wall and the secondary seal shall be performed within sixty (60) days of the

- initial fill with VOL and at least once per year thereafter.
- (C) If any source ceases to store VOL for a period of one (1) year or more, subsequent introduction of VOL into the vessel shall be considered an initial fill for purposes of this subdivision.
- (2) Determine gap widths and areas in the primary and secondary seals individually by the following procedures:
- (A) Measure seal gaps, if any, at one (1) or more floating roof levels when the roof is floating off the roof leg supports.
 - (B) Measure seal gaps around the entire circumference of the vessel in each place where a one-eighth (c) inch diameter uniform probe passes freely (without forcing or binding against seal) between the seal and the wall of the vessel and measure the circumferential distance of each such location.
 - (C) The total surface area of each gap described in clause (B) shall be determined by using probes of various widths to measure accurately the actual distance from the vessel wall to the seal and multiplying each such width by its respective circumferential distance.
- (3) Add the gap surface area of each gap location for the primary seal and the secondary seal individually and divide the sum for each by the nominal diameter of the vessel and compare each ratio to the respective standards in subdivision (4).
- (4) Make necessary repairs or empty the vessel within forty-five (45) days of identification of seals not meeting the requirements listed in clauses (A) and (B) as follows:
- (A) The accumulated area of gaps between the vessel wall and the mechanical shoe or liquid-mounted primary seal shall not exceed ten (10) square inches per foot of vessel diameter, and the width of any portion of any gap shall not exceed one and five-tenths (1.5) inches. There shall be no holes, tears, or other openings in the shoe, seal fabric, or seal envelope.
 - (B) The secondary seal shall meet the following requirements:
 - (i) The secondary seal shall be installed above the primary seal so that it completely covers the space between the roof edge and the vessel wall except as provided in subdivision (2)(C).
 - (ii) The accumulated area of gaps between the vessel wall and the secondary seal used in combination with a metallic shoe or liquid-mounted primary seal shall not exceed one (1) square inch per foot of vessel diameter, and the width of any portion of any gap shall not exceed five-tenths (0.5) inch. There shall be no gaps between the vessel wall and the secondary seal when used in combination with a vapor-mounted primary seal.
 - (iii) There shall be no holes, tears, or other openings in the seal or seal fabric.
 - (C) If a failure that is detected during inspections required in subdivision (1) cannot be repaired within forty-five (45) days and if the vessel cannot be emptied within forty-five (45) days, a thirty (30) day extension may be requested from the department in the inspection report required in 326 IAC 8-9-6(d)(3). Such extension

request must include a demonstration of unavailability of alternate storage capacity and a specification of a schedule that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

- (5) Notify the department thirty (30) days in advance of any gap measurements required by subdivision (1) to afford the department the opportunity to have an observer present.
- (6) Visually inspect the external floating roof, the primary seal, secondary seal, and fittings each time the vessel is emptied and degassed. For all visual inspections, the following requirements apply:
 - (A) If the external floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal fabric, the Permittee shall repair the items as necessary so that none of the conditions specified in this clause exist before filling or refilling the vessel with VOL.
 - (B) The Permittee shall notify the department in writing at least thirty (30) days prior to the filling or refilling of each vessel to afford the department the opportunity to inspect the vessel prior to the filling. If the inspection required by this subdivision is not planned and the Permittee could not have known about the inspection thirty (30) days in advance of refilling the vessel, the Permittee shall notify the department at least seven (7) days prior to the refilling of the vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the department at least seven (7) days prior to the refilling.

Storage tanks, identified as T-205, T-206, T-208, T-240, T-807, T-1201, T-2102, T-2601, and T-2602 are not subject to 326 IAC 8-9-5, since each tank store VOL with a maximum true vapor pressure of less than 0.75 psia. Any change in the VOL stored with true vapor pressure of 0.75 psia or greater but less than 11.1 psia shall be subject entirely to the requirements of this condition, under 326 IAC 8-9-5.

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

D.1.4 Record Keeping Requirements [326 IAC 8-9-6]

The Permittee shall comply with the record keeping requirements in 326 IAC 8-9-6 for Tanks T-103, T-201, T-202, T-204, T-207, T-209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809, T-810 and shall maintain the following records for a minimum of three (3) years.

- (a) Pursuant to Condition D.1.3 and 326 IAC 8-9-6, the Permittee of the internal floating roof gasoline storage tanks shall keep copies of all reports and records for at least three (3) years. The Permittee of the internal floating roof tanks shall meet the following requirements:
 - (1) Keep a record of each inspection performed as required by 326 IAC 8-9-5(b)(1) through 326 IAC 8-9-5(b)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain

- the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
- (2) If any of the conditions described in 326 IAC 8-9-5(b)(2) are detected during the annual visual inspection, a record shall be maintained and a report shall be furnished to the department within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
 - (3) After each inspection required by 326 IAC 8-9-5(b)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 326 IAC 8-9-5(b)(3)(B), a record shall be maintained and a report shall be furnished to the department within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 326 IAC 8-9-4(a)(1)(A), 326 IAC 8-9-4(a)(2)(A), or 326 IAC 8-9-5(b), and list each repair made.
- (b) Pursuant to Condition D.1.3 and 326 IAC 8-9-6, the Permittee of the external floating roof gasoline storage tanks shall keep copies of all reports and records for at least three (3) years. The Permittee of the external floating roof tanks shall meet the following requirements:
- (1) Keep a record of each gap measurement performed as required by 326 IAC 8-9-5(c). Each record shall identify the vessel in which the measurement was made and shall contain the date of measurement, the raw data obtained in the measurement and the calculations described in 326 IAC 8-9-5(c)(2) and (c)(3).
 - (2) Within sixty (60) days of performing the seal gap measurements required by 326 IAC 8-9-5(c)(1), furnish the department with a report that contains the date of measurement, the raw data obtained in the measurement, and the calculations described in 326 IAC 8-9-5(c)(2) and (c)(3).
 - (3) After each seal gap measurement that detects gaps exceeding the limitations specified in 326 IAC 8-9-5(c), submit a report to the department within thirty (30) days of the inspection. The report shall identify the vessel and contain the information specified in subdivision (2) and the date the vessel was emptied or the repairs made and date of repair.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (x) One (1) tank truck loading rack (identified as RACK) used to load gasoline, distillate, and ethanol, with a maximum loading capacity of 324,000 gallons of liquid per hour, constructed in 1940 and later reconstructed in 1979, controlled by one (1) natural gas fired Vapor Combustion Unit (VCU), rated at maximum heat input rate of 1.6 MMBtu/hr, installed in 1997, and exhausting through one (1) stack identified as VCU.
- (y) One (1) VOC fractionator for separating gasoline and fuel oil of transmix tanks, identified as FRACT, venting 125 cubic feet of VOC vapor per minute during intermittent pressure relief with venting gas being controlled by VCU, and equipped with a 7.0 million British thermal units per hour natural gas fired reboiler;
- (z) VOC emissions from the following operations:
 - (1) Fugitive VOC emissions from the loading rack, identified as FLRACK.
 - (2) Filter change out service for gasoline tanks, identified as FILT1.
 - (3) Meter proving service, identified as PROVE.

(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 2-7-5(1)]

D.2.1 Hazardous Air Pollutants [40 CFR Part 63] [326 IAC 8-4-4]

The VOC capture efficiency from the loading rack will be 97.3% and the VOC emissions from the loading rack shall be less than 35 mg per liter of gasoline loaded by the loading rack.

Compliance with the above limit combined with potential single and combined HAP emissions from other emission units shall limit the source wide HAP emissions to less than 10 tons per year for any single HAP and less than 25 tons per year for combined HAPs. This will make the source an area source for HAPs.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-4]

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

- (a) The gasoline loading equipment is equipped with a vapor control system in good working order, which will control VOC emissions to the atmosphere from the equipment being controlled to no more than 80 milligrams per liter of gasoline loaded.
- (b) Displaced vapors and gases are vented only to the vapor control system.
- (c) A means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
- (d) All loading and vapor lines are equipped with fittings which make vapor-

tight connections and which will be closed upon disconnection.

If employees of the owner of the source 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 source shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with this rule.

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-4-9]

Pursuant to 326 IAC 8-4-9, the Permittee shall:

- (a) The Permittee, which owns and operates a 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 and a vacuum from exceeding one thousand five hundred (1,500) pascals in the gasoline tank truck;
 - (B) a reading equal to or greater than one hundred percent (100%) of the lower explosive limit (LEL, measured as propane) at two and five-tenths (2.5) centimeters from all points on the perimeter of a potential leak source when measured by the method referenced in Appendix B of Control of Organic Compound leaks from Gasoline Tank Trucks and Vapor Collection Systems, EPA 450/2-78-051, or an equivalent procedure approved by IDEM during loading or unloading operations; and
 - (C) avoidable visible liquid leaks during loading or unloading operations.
 - (2) Repair and retest a vapor collection or control system that exceeds the limits in (a)(1) within fifteen (15) days.
- (b) The permittee shall maintain records of all certification testing of the vapor balance or vapor control system which identify:
 - (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 of the testing and, if applicable, retesting were completed.

- (c) If IDEM, OAQ allows alternative test procedures, then such method shall be submitted to the U.S. EPA as a SIP revision.
- (d) During compliance tests conducted under 326 IAC 3-6 (stack testing):

- (1) each vapor balance or control system shall be tested applying the standards described in (a);
- (2) testers shall use 40 CFR 60, Appendix A, Method 21 to determine if there area any leaks from the hatches and the flanges of the gasoline transports;
- (3) 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:

- (A) Ten thousand (10,000) parts per million methane for all bulk gas terminals.

Compliance Determination Requirements

D.2.4 VOC and HAPs

The Vapor Combustion Unit (VCU) for VOC and HAPs control shall be in operation at all times, when the loading rack (RACK) is transferring gasoline or when the fractionator (FRACT) is venting vapor.

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform VOC testing at the vapor combustion unit (VCU) utilizing methods as approved by the Commissioner on or before September 22, 2010. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

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

D.2.6 Vapor Combustion Unit Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)][40 CFR 64]

The permittee shall install and maintain a monitor to detect the presence of a pilot flame. The presence of a pilot flame shall be monitored using a heat-sensing device at all times when the vapors are being vented to the VCU. The monitor shall be equipped with a computer system which will not allow for the operation of the loading rack and the fractionator (FRACT) when the presence of a flame is not detected during periods when gasoline vapors are being vented to the VCU.

D.2.7 Monthly Visible Checks for Liquid Leaks [40 CFR 64]

-
- (a) 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.
 - (b) If abnormal leakage is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (c) All checks for visible liquid leaks made to comply with this condition shall be conducted in accordance with 326 IAC 8-4-9.

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records of all the required parameters listed in Condition D.2.3.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain records of monthly checks for liquid leaks of the Loading Rack and VCU stack exhaust.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: ConocoPhillips Pipe Line Company- East Chicago Terminal
Source Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Mailing Address: P.O. Box 1267, Ponca City, OK 74602-1267
Part 70 Permit No.: T089-25957-00326

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:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: ConocoPhillips Pipe Line Company- East Chicago Terminal
Source Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Mailing Address: P.O. Box 1267, Ponca City, OK 74602-1267
Part 70 Permit No.: T089-25957-00326

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: ConocoPhillips Pipe Line Company- East Chicago Terminal
 Source Address: 400 East Columbus Drive, East Chicago, Indiana 46312
 Mailing Address: P.O. Box 1267, Ponca City, OK 74602-1267
 Part 70 Permit No.: T089-25957-00326

Months: _____ to _____ Year: _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

**Addendum to the
Technical Support Document (TSD) for a Part 70 Operating Permit Renewal**

Source Name:	ConocoPhillips Pipe Line Company East Chicago Terminal
Source Location:	400 East Columbus Drive, East Chicago, IN 46312
County:	Lake
SIC Code:	5171
Permit Renewal No.:	T 089-25957-00326
Permit Reviewer:	Timothy R. Pettifor

On September 1, 2008, the Office of Air Quality (OAQ) had a notice published in the Post Tribune, Merrillville, Indiana, stating that ConocoPhillips Pipe Line Company-East Chicago Terminal had applied for a Part 70 Operating Permit renewal to continue to operate a stationary bulk liquid fuel storage and transfer terminal. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit renewal for this operation and provided information on how the public could review the proposed Part 70 Operating Permit renewal 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 Part 70 Operating Permit renewal should be issued as proposed.

On September 8 and 16, 2008, Kelly Hayes of the ConocoPhillips Pipe Line Company submitted comments on the proposed Part 70 Operating Permit renewal. The comments are as follows: the permit language if changed, has deleted language as ~~strikeouts~~ and the new language **bolded**.

Comment 1: Condition A.2 (aa) Page 7 of 47

I noticed that none of the wastewater treatment system is mentioned in the permit, except for it being listed in A.2 (aa). The system is listed in the "Permit Emission Units and Pollution Control Equipment" section of the TSD and emissions for the system are presented in the calculations attached to the TSD. Was the system as a whole considered to be insignificant?

Response 1:

The original Part 70 Operating Permit, T-089-16208-00326, issued on September 22, 2003, referenced the wastewater treatment system in Section D.3. At that time, ConocoPhillips accepted limit on the wastewater treatment system of 31.1 million gallons per consecutive twelve month period. This limit was necessary in order for ConocoPhillips to have emissions less than ten tons per year for any single HAP and less than twenty-five tons per year for any combination of HAP's. This limit is no longer necessary in order for the source to remain below the ten/twenty-five threshold. Therefore, the wastewater treatment system is not a specifically regulated emission unit and is not included in any of the D-sections.

Comment 2: Technical Support Document (TSD) Page 13 of 14

In the Compliance Determination and Monitoring Requirements, paragraph (b) still refers to daily liquid leak inspections for the rack. This was changed to NSPS XX LDAR inspections within the actual draft of the permit (Condition D.2.7).

Response 2:

OAQ agrees that the daily liquid leak inspections for the loading rack should have been removed from the TSD. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result, ensuring that these types of concerns are documented and part of the record regarding this permit decision.

No changes have been made to the permit as a result of these comments.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	ConocoPhillips Pipe Line Company East Chicago Terminal
Source Location:	400 East Columbus Drive, East Chicago, IN 46312
County:	Lake
SIC Code:	5171
Permit Renewal No.:	T089-25957-00326
Permit Reviewer:	Timothy R. Pettifor

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from ConocoPhillips Pipe Line Company - East Chicago Terminal relating to the operation of a stationary bulk liquid fuel storage and transfer terminal.

History

On January 23, 2008, ConocoPhillips submitted an application to the OAQ requesting to renew its operating permit. ConocoPhillips was issued a Part 70 Operating Permit Renewal, T089-16208-00326, on September 22, 2003. The source has since received the following approvals:

- (a) Administrative Amendment No. T089-18204-00326, issued on January 21, 2004;
- (b) Administrative Amendment No. T089-20283-00326, issued on July 20, 2005; and
- (c) Significant Permit Modification No. T089-21925-00326, issued on March 27, 2006.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) 813,624 gallon external floating roof gasoline storage tank, identified as T-201, with primary and secondary seals, constructed in 1939.
- (b) One (1) 653,100 gallon external floating roof gasoline storage tank, identified as T-202, with primary and secondary seals, constructed in 1939.
- (c) Two (2) 2,956,380 gallon external floating roof gasoline storage tanks, identified as T-801 and T-802, both with primary and secondary seals, both constructed in 1939.
- (d) One (1) 2,759,316 gallon external floating roof gasoline storage tank, identified as T-803, with primary and secondary seals, constructed in 1939.
- (e) One (1) 2,853,732 gallon external floating roof gasoline storage tank, identified as T-804, with primary and secondary seals, constructed in 1939.
- (f) One (1) 3,055,542 gallon external floating roof gasoline/transmix storage tank, identified as T-805, with primary and secondary seals, constructed in 1939.
- (g) One (1) 2,843,274 gallon external floating roof gasoline storage tank, identified as T-806, with primary and secondary seals, constructed in 1939.

- (h) One (1) 616,938 gallon internal floating roof gasoline storage tank, identified as T-204, with a primary seal, constructed in 1939.
- (i) One (1) 630,000 gallon internal floating roof gasoline storage tank, identified as T-207, with a primary seal, constructed in 1946.
- (j) One (1) 696,695 gallon internal floating roof gasoline/transmix (a gasoline/distillate oil mixture) storage tank, identified as T-209, with a primary seal, constructed in 1946.
- (k) One (1) 739,830 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-208, constructed in 1946.
- (l) One (1) 964,824 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-240, constructed in 1968.
- (m) One (1) 8,633,646 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2101, constructed in 1955.
- (n) One (1) 8,618,190 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2102, constructed in 1955.
- (o) One (1) 10,847,382 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2601, originally constructed in 1960 and later modified in 2002.
- (p) One (1) 10,835,328 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2602, originally constructed in 1960 and later modified in 2002.
- (q) Two (2) 635,040 gallon vertical fixed roof distillate/kerosene storage tanks, identified as T-205 and T-206, constructed in 1939.
- (r) One (1) 3,410,988 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-807, constructed in 1939.
- (s) Two (2) 15,204 gallon horizontal fixed roof gasoline additive storage tanks, identified as T-1501 and T-1502, both constructed in 1940.
- (t) One (1) 1,465,002 gallon domed internal floating roof gasoline storage tank, identified as T-401, with a primary seal, constructed in 1952.
- (u) Two (2) 2,857,890 gallon domed internal floating roof gasoline storage tanks, identified as T-809 and T-810, each with a primary seal, both constructed in 1952.
- (v) One (1) 2,841,552 gallon domed internal floating roof gasoline/transmix storage tank, identified as T-808, with a primary and seal, constructed in 1952.
- (w) Gasoline tank cleaning operation, identified as TNKCLN GAS.
- (x) One (1) tank truck loading rack (identified as RACK) used to load gasoline, distillate, and ethanol, with a maximum loading capacity of 324,000 gallons of liquid per hour, constructed in 1940 and later reconstructed in 1979, controlled by one (1) natural gas fired Vapor Combustion Unit (VCU), rated at maximum heat input rate of 1.6 MMBtu/hr, installed in 1997, and exhausting through one (1) stack identified as VCU.

- (y) One (1) VOC fractionator for separating gasoline and fuel oil of transmix tanks, identified as FRACT, venting 125 cubic feet of VOC vapor per minute during intermittent pressure relief with venting gas being controlled by VCU, and equipped with a 7.0 million British thermal units per hour natural gas fired reboiler;
- (z) VOC emissions from the following operations:
 - (1) Fugitive VOC emissions from the loading rack, identified as FLRACK.
 - (2) Gasoline tank cleaning operation, identified as TNKCLN GAS.
 - (3) Filter change out service for gasoline tanks, identified as FILT1.
 - (4) Meter proving service, identified as PROVE.
- (aa) A wastewater handling and treatment system, capable of treating 420,000 gallons of contaminated water per hour, including the following activities:
 - (1) Five (5) sumps for wastewater from tank water draw and roof drains;
 - (2) One (1) sump for wastewater from loading rack;
 - (3) One (1) 379,638 gallon internal floating roof waste water/gasoline storage tank, identified as T-103, constructed in 1939;
 - (4) One (1) dissolved air floatation oil/water separator, identified as TS DAF, with a maximum capacity of 12,000 gallons per hour;
 - (5) One (1) oil/water separator, identified as TS OWS/Separator No. 1, with a maximum capacity of 11,000 gallons per hour; and
 - (6) One (1) air stripper capable of processing a maximum of 23,000 gallons of water per hour.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units (Btu) per hour.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 0.5 mmBtu/hr, except where total capacity of equipment operated by one stationary source exceeds 2.0 mmBtu/hr.
- (c) Combustion source flame safety purging on startup.
- (d) 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.
- (e) VOC and HAP storage tanks with capacity less than or equal 1,000 gallons and annual throughputs less than 12,000 gallons.
- (f) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (g) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (i) 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°C; or

- (2) having a vapor pressure equal to or less than 0.7 kPa, 0.1 mmHg, or 0.1 psi measured at 20°C.

The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

- (j) The follow equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (k) Groundwater oil recovery wells.
- (l) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by weight.
- (m) Any operation using aqueous solvents containing less than 1% by weight of VOCs, excluding HAPs.
- (n) Heat exchanger cleaning and repair.
- (o) Process vessel degassing and cleaning to prepare for internal repairs.
- (p) Stockpiled soils from soil remediation activities that are covered and waiting transportation for disposal.
- (q) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4].
- (r) Asbestos abatement projects regulated by 326 IAC 14-10.
- (s) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (t) 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.
- (u) Blowdown for any of the following:
sight glass, boiler, compressors, pumps, and cooling tower.
- (v) On-site fire and emergency response training approved by the department.
- (w) Gasoline generators not exceeding 110 horsepower.
- (x) Stationary fire pumps.
- (y) Purge double block and bleed valves.
- (z) Filter or coalescer media changeout.
- (aa) A laboratory as defined in 326 IAC 2-7-1(21)(B).
- (bb) Two (2) 36,414 gallon horizontal pressurized tanks, identified as T-4201 and T4202, both constructed in 1975.

- (cc) Three (3) pressurized spheroid tanks, identified as T-051, T-210 and T-301, each with a respective capacity of 197,400, 753,018 and 1,125,012 gallons, and each constructed in 1963, 1959 and 1961, respectively.
- (dd) Fugitive liquid and vapor emissions due to equipment leaks.
- (ee) Cleaning of non-gasoline tanks.
- (ff) One (1) oil/water separator, identified as Separator No. 2, with a capacity of 1,000 gallons per hour.
- (gg) Pipeline pigging.

Existing Approvals

Since the issuance of the Part 70 Operating Permit T089-16208-00326 on September 22, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. T089-18204-00326, issued on January 21, 2004;
- (b) Administrative Amendment No. T089-20283-00326, issued on July 20, 2005; and
- (c) Significant Permit Modification No. T089-21925-00326, issued on March 27, 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

The calculations submitted by the applicant have been verified and found to be accurate and correct.

County Attainment Status

The source is located in Lake County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148 th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O ₃	Nonattainment Subpart 2 Moderate effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Nonattainment Severe 17 effective November 15, 1990, for the Chicago-Gary-Lake County area for the 1-hour ozone standard which was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM2.5.	

(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 September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (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.

(i) 1-hour ozone standard

On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NOx threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

(ii) 8-hour ozone standard

VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

- (b) U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Lake County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.
- (c) **Other Criteria Pollutants**
Lake County has been classified as attainment or unclassifiable in Indiana for carbon monoxide, sulfur dioxide and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Since this source is classified as a petroleum storage and transfer unit 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 2-2-1(gg)(1).
- (e) **Fugitive Emissions**
Since this type of operation is in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	<100
PM ₁₀	<100
SO ₂	<100
VOC	>100
CO	>100
NO _x	<100

HAPs	tons/year
Single	>10
Combined	>25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC and CO is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. The source has taken limits on single and combined HAPs to be less than 10 and 25 tons per year in order to be an area source for HAPs.

Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are counted toward the determination of Part 70 applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/facility	Potential to Emit(tons/year)						
	PM	PM-10	PM-2.5	SO ₂	VOC	CO	NO _x
Storage Tanks	--	--	--	--	82.26	--	--
Loading Rack (VCU) and Fugitives	--	--	--	--	370.26	--	--
Vapor Combustion Unit (VCU)	--	--	--	--	--	282.91	58.29
Non-tank Process emissions ⁽¹⁾	--	--	--	--	9.65	--	--
Insignificant Activities ⁽²⁾	0.14	0.31	0.31	0.10	6.71	3.61	4.60
Total Emissions	0.14	0.31	0.31	0.10	468.88	286.52	62.89

Notes:

(1) Non-tank process emissions consist of VOC emissions from Tank Cleaning (gasoline), Filter Changeout (gasoline), Meter Proving and Wastewater handling and treatment system.

(2) Insignificant activities consist of Filter Change-out (distillate), Pipeline Pigging, Oil water separator # 2, and Fugitives from equipment leaks.

- (a) This existing stationary source is major for Emission Offset for ozone because the emissions of the nonattainment pollutant, VOC are greater than twenty-five (25) tons per year.
- (b) This existing stationary source is major for PSD because the emissions of CO are more than one hundred (100) tons per year.

- (c) This existing stationary source is minor for NSR Nonattainment for PM_{2.5} and SO₂ because the PM_{2.5} and SO₂ emissions, are each less than 100 tons per year.
- (d) Fugitive Emissions
 Since this type of operation is in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Loading Rack/ VOC	Y	N	>100	>100	100	N	Y
Loading Rack/ HAPs	Y	Y	1.42 Toluene 4.82 Total	1.42 Toluene 4.82 Total	10 Single 25 Total	N	N
Loading Rack/ CO	N	N	>100	>100	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to the Loading Rack for VOC upon issuance of this Title V Renewal.

- (b) Storage tanks identified as T-1501, T-1502, T-202, T-204, T-205, T-206, T-207, T-208, T-209, T-2101, T-2102, T-240, T-401, T-201, T-801, T-802, T-803, T-804, T-805, T-806, T-807, T-808, T-809, T-810, and T-103 are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Parts 60.110, 110a-115a or 110b-117b, Subparts K, Ka and Kb), because these tanks were all constructed between 1953 and 1970, prior to the earliest applicability date of June 11, 1973 for Subpart K, Ka or Kb.
- (c) Storage tanks identified as T-2601 and T-2602 (re-constructed in 2002) are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110, Subpart Kb) where construction, reconstruction, or modification commenced after July 23, 1984, because these tanks have capacities greater than 151 cubic meters (m³) (39,889 gallons) and store only volatile organic compounds with a maximum true vapor pressure less than 3.5 kPa.

- (d) The existing loading rack is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.500, Subpart XX) "Standards of Performance for Bulk Gasoline Terminals" because the loading rack was constructed in 1940 and reconstructed in 1979, which was prior to the December 17, 1980 applicability date, and was not modified or reconstructed since then. The VCU used for controlling VOC emissions from gasoline loading operations was installed in 1997 to replace the originally equipped vapor recovery unit (VRU) to improve control efficiency from 95% to 99%. Although the VCU installed increased both CO and NO_x emissions, the primary function of the unit is to control VOC emissions and the cost of the control device did not exceed 50% of an entire new loading rack. Pursuant to 40 CFR 60.14 (e)(5) and 40 CFR 60.15 (b)(1), this replacement of the VOC control device in 1997 is neither a modification nor a reconstruction under the definition in the NSPS.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal because the source is not a major source of HAP. The source has chosen to limit the source wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively, by limiting the VOC emissions from the loading rack.

State Rule Applicability - Entire Source

326 IAC 2-2 (PSD)

The existing source was constructed prior to the August 7, 1977 rule applicability date. CO emissions are more than 100 tons per year. Therefore, this source is a major source for Prevention of Significant Deterioration.

326 IAC 2-3 (Emission Offset)

The existing source is located in Lake County which is nonattainment for Ozone for which VOC emissions are a precursor. The sourcewide VOC emissions of 468.88 tons per year exceed the current threshold for Lake County of 25 tons per year. Therefore, the source is major for Emission Offset for ozone.

326 IAC 2-1.1-5 (Air Quality Requirements)

The existing source is located in Lake County which is nonattainment for PM_{2.5}, and the PM_{2.5} emissions are less than 100 tons per year. Therefore, the source is minor for nonattainment NSR for PM_{2.5}.

HAPs Minor Limit [40 CFR 63] [326 IAC 20]

The VOC capture efficiency from the loading rack will be 97.3% and the VOC emissions from the loading rack shall be less than 35 mg per liter of gasoline loaded, by the loading rack.

Compliance with the above limit combined with potential single and combined HAP emissions from other emission units shall limit the source wide HAP emissions to less than 10 tons per year for any single HAP and less than 25 tons per year for combined HAPs. This will make the source an area source for HAPs.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted annually by July 1. Therefore, the next emission statement for this source must be submitted by July 1, 2009. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (2) (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions for sources located in Lake County shall meet the following limitations, unless otherwise stated in this permit:

- (a) visible emissions shall not exceed an average of twenty percent (20%) opacity in twenty-four (24) consecutive readings; and
- (b) visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

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). 326 IAC 6-4-2(4) is not federally enforceable.

State Rule Applicability - Individual Facilities

326 IAC 6.8-1-1 (Particulate Matter Limitations for Lake County)

The source is not subject to the requirements of 326 IAC 6.8-1-1, because the potential particulate matter (PM) emissions from the source are less than 100 tons per year and the actual PM emissions from the source are less than 10 tons per year.

326 IAC 6.8-2 (Lake County PM-10 Emission Requirements)

The source is not listed in 326 IAC 6.8-2. Therefore, pursuant to 326 IAC 6.8-2, the requirements of 326 IAC 6.8-2 do not apply.

326 IAC 6.8-10 (Lake County Fugitive Particulate Matter Control Requirements)

This source is not subject to the control requirements of 326 IAC 6.8-10 because the potential to emit fugitive particulate matter is less than five tons per year.

326 IAC 8-3-2 (Cold Cleaner Operations)

The source, which is located in Lake County and maintains Safety-Kleen type cold cleaning parts washer with capacity of less than 145 gallons per year (i.e., insignificant activities), is not subject to the applicable rule requirements since this facility was constructed prior to the rule applicability date of January 1, 1980.

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

This rule applies to all petroleum liquid storage facilities in Clark, Elkhart, Floyd, Hendricks, Lake, Marion, Porter, and St. Joseph Counties regardless of the construction dates. Pursuant to 326 IAC 8-4-1, the petroleum liquid storage tanks with a capacity greater than 39,000 gallons containing volatile organic compounds whose true vapor pressure is greater than 1.52 pounds per square inch (psi) are subject to the requirements of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities). Since this source is located in Lake County, the petroleum liquid storage tanks identified as T-103, T-201, T-202, T-204, T-207, T-209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809 and T-810, each with a capacity greater than 39,000 gallons containing volatile organic liquid whose true vapor pressure is greater than 1.52 pounds per square inch (psi) are subject to the requirements of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities).

Other storage tanks at the source which are not subject to the requirements of 326 IAC 8-4-3, include T-205, T-206, T-208, T-240, T-807, T-2101, T-2102, T-2601 and T-2602, because each stores petroleum liquid whose true vapor pressure is less than 1.52 psi. Also, storage tanks identified as T-1501 and T-1502, each has a capacity less than 39,000 gallons, and are therefore not subject to this rule.

All storage tanks at the source, which are subject to the requirements of 326 IAC 8-4-3 (include T-103, T-201, T-202, T-204, T-207, T209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809 and T-810), are either external floating roof tanks with dome covers as well as primary and secondary seals, or internal floating roof tanks with closure seal or seals.

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

The source is subject to the requirements of 326 IAC 8-4-4 since it meets the applicability conditions of 326 IAC 8-4-1(a) being located in Lake County. Pursuant to this rule the gasoline bulk terminal shall be equipped with a vapor recovery system releasing no more than 80 milligrams of VOC per liter of gasoline loaded. Displaced vapors and gases must only be vented to the vapor recover system, drainage after loading must be complete or a collection system must be provided to prevent liquid drainage and all loading and vapor lines must be vapor-tight. The owner of the terminal must take reasonable steps to insure that the owners of the transports are complying with these conditions at all times.

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

This source is a Bulk Gasoline Terminal and does not meet the definition of a Bulk Gasoline Plant in 326 IAC 1-2-7, defined as "a gasoline storage and distribution facility which receives gasoline from bulk terminals by transport, stores it in tanks and subsequently dispenses it via account trucks to local farms, businesses, and service stations."

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

This source does not qualify as a gasoline dispensing facility as defined in 326 IAC 8-4-6 as "any facility where gasoline is dispensed into motor vehicle fuel tanks or portable containers from a storage tank... ". This source is a bulk gasoline terminal that loads gasoline and distillates into transports via a loading rack. Therefore, the storage tanks and loading rack at this source are not subject to the requirements of 326 IAC 8-4-6.

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

Pursuant to 326 IAC 8-4-9(a)(1), the source is subject to 326 IAC 8-4-9(d),(f),(h)and (i), (Leaks from Transports and Vapor Collection Systems; Records), because the source is subject to 326 IAC 8-4-4 (Bulk Gasoline Terminals).

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

Pursuant to 326 IAC 8-7-2(a)(3)(C), the source is not subject to the requirements of 326 IAC 8-7, because the source is subject to 326 IAC 8-4-4 (Bulk Gasoline Terminals).

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

Pursuant to 326 IAC 8-9-1, on and after October 1, 1995 stationary vessels used to store volatile organic liquids (VOL) must comply with the requirements of the rule if located in Clark, Floyd, Lake or Porter Counties. Stationary vessels with capacities less than 39,000 gallons are only subject to the reporting and record keeping requirements of the rule. Stationary vessels with capacities equal to or greater than 39,000 gallons storing a VOL with a maximum true vapor pressure equal to or greater than 0.5 pounds per square inch absolute (psia), but less than 0.75 psia, are only subject to 326 IAC 8-9-6(a),(b),(g), and (h). Additionally, stationary vessels that are subject to any provision of 40 CFR 60, Subpart Kb, New Source Performance Standard for Volatile Organic Liquid Storage are exempt from 326 IAC 8-9; therefore, Tanks T-2601 and T-2602 are exempt.

- (a) Storage tanks identified as T-1501 and T-1502 are only subject to the reporting and record keeping requirements of this rule. While the listed tanks contain volatile organic compounds, they have storage capacities less than 39,000 gallons.
- (b) Storage tanks identified as T-103, T-201, T-202, T-204, T-207, T-209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809, T-810, each with a capacity greater than

39,000 gallons, are subject to the requirements of this rule because the listed tanks contain petroleum liquids with a maximum true vapor pressure greater than 0.75 psia.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

The source is not subject to the requirements of 326 IAC 9-1 (Carbon Monoxide Emission Limits), because it is not one of the source types listed in 326 IAC 9-1-2.

Compliance Determination and Monitoring Requirements

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

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance determination requirements applicable to this source are as follows:

Emission Unit	Control Device	Pollutant	Frequency of Testing	Limit or Requirement
Loading Rack	VCU	VOC	Once every 5 years	Capture efficiency of 98.7% to emit less than 35 mg VOC/liter of gasoline loaded

The operation of the loading rack and vapor combustion unit (VCU) has applicable compliance monitoring conditions as specified below:

- (a) The vapor combustion unit (VCU) shall operate at all times the loading rack (RACK) is transferring gasoline or when the fractionator (FRACT) is in operation. The permittee shall install and maintain a monitor to detect the presence of a pilot flame. The presence of a pilot flame shall be monitored using a heat-sensing device at all times when the vapors are being vented to the VCU. The monitor shall be equipped with a computer system which will not allow for the operation of the loading rack (RACK) and/or the fractionator (FRACT) when the presence of a flame is not detected during periods when gasoline vapors are being vented to the VCU.
- (b) Daily checks for liquid leaks during loading or unloading operations of the Loading Rack, the vapor collection system and the vapor recovery unit (VRU) shall be performed during normal daylight operations when the facility is in operation. A trained employee will record any visible liquid leaks and the date of such leaks. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the

process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a liquid leak is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. All checks for visible liquid leaks made to comply with this condition shall be conducted in accordance with 326 IAC 8-4-9.

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 23, 2008.

Conclusion

The operation of this stationary bulk liquid fuel storage and transfer terminal shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T089-25957-00326.

Appendix A: Emission Calculations

Company Name: ConocoPhillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Permit No.: T089-16208-00326
Reviewer: Timothy R. Pettifor
Date: August 5, 2008

Total Potential To Emit (tons/year)						
Emissions Generating Activity						
Pollutant	Storage Tanks	Loading Rack VCU + Fugitives	Non-tank Processes Significant	VCU Emissions	Insignificant Activities	TOTAL
PM	0.00	0.00	0.00	0.00	0.14	0.14
PM10	0.00	0.00	0.00	0.00	0.31	0.31
SO2	0.00	0.00	0.00	0.00	0.10	0.10
NOx	0.00	0.00	0.00	58.29	4.60	62.89
VOC	82.26	370.26	9.65	280.68	6.71	468.88
CO	0.00	0.00	0.00	282.91	3.61	286.52
total HAPs	3.52	4.82	1.58	3.65	1.58	11.50
worst case single HAP	1.25 (Toluene)	1.42 (Toluene)	0.40 (Toluene)	1.08 (Toluene)	0.51 (Toluene)	3.58 (Toluene)

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

**Appendix A: Emission Calculations
Potential Tank VOC Emissions**

**Company Name: ConocoPhillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Permit No.: T089-16208-00326
Reviewer: Timothy R. Pettifor
Date: August 5, 2008**

Tank Number	Product Stored							Total VOC
		Working	Withdraw	Rim Seal	Deck Fitting	Deck Seam	Breathing	Tons/yr
T-103	WATER	--	0.01	0.00	0.01	0.00	--	0.02
T-201	Out of Service	--	--	--	--	--	--	0.00
T-202	Gasoline	--	0.66	1.02	0.90	0.00	--	2.59
T-204	Avgas	--	0.43	0.21	0.52	0.00	--	1.16
T-205	Distillate	0.49	--	--	--	--	0.08	0.58
T-206	Distillate	0.69	--	--	--	--	0.08	0.77
T-207	Ethanol	--	1.29	0.16	0.15	0.00	--	1.60
T-208	Distillate	1.03	--	--	--	--	0.03	1.06
T-209	Transmix	--	1.12	0.69	0.65	0.00	--	2.45
T-240	Distillate	1.51	--	--	--	--	0.07	1.58
T-401	Avgas	--	0.29	0.08	0.12	0.00	--	0.49
T-801	Gasoline	--	0.50	2.29	3.55	0.00	--	6.33
T-802	Gasoline	--	1.43	2.14	3.34	0.00	--	6.91
T-803	Gasoline	--	0.58	2.12	3.34	0.00	--	6.03
T-804	Gasoline	--	1.45	2.12	3.34	0.00	--	6.90
T-805	Transmix	--	1.45	2.12	3.34	0.00	--	6.90
T-806	Gasoline	--	1.45	2.12	3.34	0.00	--	6.90
T-807	Distillate	1.73	--	--	--	--	0.11	1.85
T-808	Transmix	--	0.64	0.14	0.10	0.00	--	0.88
T-809	Gasoline	--	0.58	0.27	0.18	0.00	--	1.02
T-810	Gasoline	--	0.58	0.27	0.18	0.00	--	1.02
T-1501	Gas Additive	1.67	--	--	--	--	0.15	1.82
T-1502	Jet Additive	0.05	--	--	--	--	0.00	0.06
T-1503	Diesel Additive	0.01	--	--	--	--	0.00	0.01
T-1504	Diesel Additive	0.04	--	--	--	--	0.00	0.05
T-2101	Kerosene	5.62	--	--	--	--	0.64	6.26
T-2102	Distillate	5.66	--	--	--	--	0.64	6.29
T-2601	Kerosene	4.54	--	--	--	--	0.79	5.34
T-2602	Distillate	4.59	--	--	--	--	0.79	5.38
Dye Tote	Red Dye	0.00	--	--	--	--	0.00	0.00
Total VOC		27.6	12.5	15.7	23.0	0.0	3.4	82.3

Note: (1) All storage tank emissions estimated using EPA's TANKS 4.09d software program.
(2) Worst case VOC emissions due to withdraw loss were determined based on the maximum tank discharge rates.

**Appendix A: Emission Calculations
Potential Non-Tank Emissions**

Company Name: ConocoPhillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Permit No.: T089-16208-00326
Reviewer: Timothy R. Pettifor
Date: August 5, 2008

	Facility ID	Facility Description	VOC (1) (ton/yr)
	Significant Units		
Loading Rack	FLRACK	Loading Rack Fugitive (2)	89.58
	RACK	Loading Rack (3)	280.68
	TNKCLN GAS	Tank Cleaning (Gasoline)	7.51
	FILT1	Filter Changeout (Gasoline)	0.02
	PROVE	Meter Proving	0.14
Wastewater Handling and Treatment System	OWS1	Oil/Water Separator #1	0.21
	SUMPS 1-5	Sumps for Tanks	0.29
	SUMP 6	Sump for Loading Dock	0.01
	STRIPPER	Air Stripper	1.47
		Sub Total	379.91
	Insignificant Units		
	FILT2	Filter Changeout (KTF)	0.00
	FILT3	Filter Changeout (Distillate)	0.00
	PIG2	Pipeline Piggings	0.34
	FUG LIQ	Equip. Leaks (Liquid)	5.31
	FUG VAP	Equip. Leaks (Vapor)	0.04
New Wastewater Treatment System	OWS2	Oil/Water Separator #2	0.15
	DAF	Dissolve Air Floatation OWS	0.11
	TS-T1	Wastewater Tank	0.44
	TS-T3	Recovered Product Tank	0.32
		Sub Total	6.70
		Grand Total	386.61

Note:

- (1) The emissions listed are based on the emission calculations submitted by the applicant which were verified and found to be accurate and correct.
- (2) Fugitive VOC emissions are emissions due to loading of materials that are not routed to vapor combustion unit (VCU) with 98.7% capturing.
- (3) Emissions from loading of liquid fuels that are routed through VCU and the intermittent venting of the Fractionator during pressure relief. Allowable emission of 35 mg/L gasoline loaded is used for calculating emissions from gasoline loading.
- (4) VOC emissions from tank cleaning are based on each of the 4 tanks (4 gasoline) being cleaned once per year.

**Appendix A: Emission Calculations
Process Fugitive**

Company Name: ConocoPhillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Permit No.: T089-16208-00326
Reviewer: Timothy R. Pettifor
Date: August 5, 2008

Component Type	Service	Avg. Emission Factor (lb/hr/unit)	Component Quantity	VOC Emissions (lb/hr)	VOC Emissions (tons/yr)
Pump Seals	Light Liquid	1.17E-03	73	0.085	0.37
Pump Seals	Heavy Liquid	1.17E-03	14	0.016	0.07
Valves	Light Liquid	9.48E-05	2878	0.273	1.20
Valves	Heavy Liquid	9.48E-05	1411	0.134	0.59
Connectors	Light Liquid	1.72E-05	11506	0.198	0.87
Connectors	Heavy Liquid	1.72E-05	5645	0.097	0.43
Open-ended Lines	Light Liquid	2.87E-04	847	0.243	1.06
Other	Light Liquid	2.87E-04	332	0.095	0.42
Relief Valves	Liquid	2.87E-04	242	0.069	0.30
			Total (Liquid):	1.211	5.31
Valves	Vapor	2.87E-05	38	0.001	0.00
Connectors	Vapor	9.04E-05	77	0.007	0.03
			Total (Vapor):	0.008	0.04
Total				1.22	5.34

Note: Emission factors are taken from: U.S. EPA. Office of Air Quality Planning and Standards. Protocol for Equipment Leak Emission Estimates.
 (Research Triangle Park, NC: U.S. EPA EPA-453/R-95-017, 1995). Table 2-3

Methodology:

VOC Emissions (tpy) = Quantity x Emission Factor x (1 ton/ 2000 lb) x (8760 hr / 1 yr)

**Appendix A: Emission Calculations
HAP Potential Emissions Summary**

Company Name: ConocoPhillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Permit No.: T089-16208-00326
Reviewer: Timothy R. Pettifor
Date: August 5, 2008

Source	Service	VOC Emissions	Vapor Weight Percent											Total	
			Benzene	Toluene	Ethylbenzene	Xylenes	Cumene	Hexane	Isocctane	MTBE	Naphthalene	TEL	Phenol		Methanol
	Gasoline		0.25%	0.38%	0.03%	0.08%	0.01%	0.36%	0.09%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%
	Aviation Gasoline		0.25%	0.38%	0.03%	0.08%	0.01%	0.36%	0.09%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%
	Kerosene/Diesel		0.40%	3.56%	1.09%	2.03%	0.47%	0.82%	0.93%	0.00%	0.13%	0.00%	0.00%	0.00%	0.00%
	Gasoline Add		1.66%	0.74%	0.07%	0.47%	0.10%	1.26%	1.25%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Jet Fuel Add		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Lubricity		1.79%	0.65%	8.31%	43.42%	0.00%	1.36%	1.34%	0.00%	0.07%	0.00%	0.00%	0.00%	0.00%
	Diesel Add		0.11%	0.04%	0.89%	4.48%	0.00%	0.08%	0.08%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Process Liquid		1.25%	7.12%	1.63%	6.09%	0.85%	1.10%	0.95%	0.47%	0.44%	0.00%	0.00%	0.00%	0.00%
	Stripper Exh.		25.00%	25.00%	25.00%	25.00%	0.00%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%
HAP Emissions (tons/yr)															
T-1501	Gasoline Add.	1.82	0.03	0.01	0.00	0.01	0.00	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.1012
T-1502	Jet Fuel Add	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0000
T-1503	Lubricity	0.01	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0076
T-1504	Diesel Add	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0027
T-202	Gasoline	2.59	0.01	0.01	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.0336
T-204	Aviation Gasoline	1.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0151
T-205	Distillate	0.58	0.00	0.02	0.01	0.01	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.0542
T-206	Distillate	0.77	0.00	0.03	0.01	0.02	0.00	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.0729
T-207	Gasoline	1.60	0.00	0.01	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.0208
T-208	Kerosene	1.06	0.00	0.04	0.01	0.02	0.00	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.0998
T-209	Gasoline	2.45	0.01	0.01	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.0319
T-2101	Kerosene	6.26	0.03	0.22	0.07	0.13	0.03	0.05	0.06	0.00	0.01	0.00	0.00	0.00	0.5902
T-2102	Kerosene	6.29	0.03	0.22	0.07	0.13	0.03	0.05	0.06	0.00	0.01	0.00	0.00	0.00	0.5933
T-240	Kerosene	1.58	0.01	0.06	0.02	0.03	0.01	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.1486
T-2601	Kerosene	5.34	0.02	0.19	0.06	0.11	0.03	0.04	0.05	0.00	0.01	0.00	0.00	0.00	0.5031
T-2602	Kerosene	5.38	0.02	0.19	0.06	0.11	0.03	0.04	0.05	0.00	0.01	0.00	0.00	0.00	0.5070
T-401	Aviation Gasoline	0.49	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0064
T-201	Gasoline (OOS)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0000
T-801	Gasoline	6.33	0.02	0.02	0.00	0.01	0.00	0.02	0.01	0.01	0.00	0.00	0.00	0.00	0.0824
T-802	Gasoline	6.91	0.02	0.03	0.00	0.01	0.00	0.02	0.01	0.01	0.00	0.00	0.00	0.00	0.0899
T-803	Gasoline	6.03	0.01	0.02	0.00	0.00	0.00	0.02	0.01	0.01	0.00	0.00	0.00	0.00	0.0785
T-804	Gasoline	6.90	0.02	0.03	0.00	0.01	0.00	0.02	0.01	0.01	0.00	0.00	0.00	0.00	0.0898
T-805	Gasoline	6.90	0.02	0.03	0.00	0.01	0.00	0.02	0.01	0.01	0.00	0.00	0.00	0.00	0.0898
T-806	Gasoline	6.90	0.02	0.03	0.00	0.01	0.00	0.02	0.01	0.01	0.00	0.00	0.00	0.00	0.0898
T-807	Distillate	1.85	0.01	0.07	0.02	0.04	0.01	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.1741
T-808	Gasoline	0.88	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0115
T-809	Gasoline	1.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0133
T-810	Gasoline	1.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0133
T-103	WasteWater	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0003
FLRACK	Gasoline	89.58	0.22	0.34	0.02	0.07	0.01	0.32	0.08	0.09	0.00	0.00	0.00	0.00	1.1656
RACK	Gasoline	280.68	0.70	1.08	0.08	0.23	0.02	1.00	0.27	0.28	0.00	0.00	0.00	0.00	3.6522
TNKCLN GAS	Gasoline	7.51	0.02	0.03	0.00	0.01	0.00	0.03	0.01	0.01	0.00	0.00	0.00	0.00	0.098
FILT1	Gasoline	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000
PROVE	Gasoline	0.14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.002
OWS1	Gasoline	0.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.003
SUMPS 1-5	Gasoline	0.29	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.004
SUMP 6	Gasoline	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000
STRIPPER	Stripper Exh.	1.47	0.37	0.37	0.37	0.37	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.472
FILT2	Gasoline	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000
FILT3	Gasoline	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000
PIG1	Gasoline	0.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.004
FUG LIQ	Process Liquid	5.31	0.07	0.38	0.09	0.32	0.05	0.06	0.05	0.02	0.02	0.00	0.00	0.00	1.056
FUG VAP	Gasoline	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.001
TrtSystem	Gasoline	1.02	0.13	0.13	0.13	0.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.520
Total	tons/yr	468.9	1.8	3.58	1.0	1.8	0.2	1.9	0.8	0.4	0.1	0.0	0.0	0.0	11.499

Note: (1) All storage tank emissions are calculated using EPA's TANKS 4.09d software program.

(2) Potential HAP emissions (tons/yr) = Potential VOC emissions (tons/yr) * Vapor Weight % HAPs

(3) FUG HAP emissions were conservatively estimated assuming all fluids in service had liquid gasoline HAP composition. Percent (%) by weight in liquid based on speciation for gasoline.

(4) Percent (%) weight in vapor conservatively based on speciation data either provided by ConocoPhillips Pipe Line.

(5) HAPs emissions from additives are based on worst case gasoline additive HAP speciation provided by ConocoPhillips Pipe Line Co.

**Appendix A: Emission Calculations
Natural Gas Combustion**

**Company Name: ConocoPhillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Permit No.: T089-16208-00326
Reviewer: Timothy R. Pettifor
Date: August 5, 2008**

I. Fuel Combustion

Heat Input Capacity		Potential Throughput	
7.1	MMBtu/hr	Reboiler	61.8 MMCF/yr
		VCU Pilot Flame	7.95 MMCF/yr
		Total	69.7 MMCF/yr

Heat Input Capacity includes:
one - 7 mmBtu/hr reboiler for the Fractionator
one - 0.054 mmBtu/hr pilot for the VCU

Emission Factor in lb/MMCF	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.07	0.27	0.02	3.49	0.19	2.93

Methodology:

MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36
Emission Factors for CO: uncontrolled = 21, Low NOx burner = 15, Flue Gas Recirculation = ND.
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

II. VCU Emissions

Maximum Hourly	Total Throughput	Limited Throughput			
433.5	1000 gal product/hr	649.1	MMgal products/yr		
204.0	1000 gal gasoline/hr	320.0	MMgal gasoline/yr		
Emission Factor in lb/1000 gal throughput	Pollutant				
	NOx	CO	VOC** 35 (mg/Liter)	VOC Other tons/yr	Total VOC tons/yr
Potential Emission in tons/yr	58.29	282.91	260.96	19.72	280.68
Limited Emission in tons/yr	9.96	48.36	46.73	3.265	49.99

35mg/L = 0.2921 lb/1000 gal VOC Other = Distillate, Ethanol, Fractionator, Proving

Methodology:

Emission factors were based on equipment manufacturer's information.
Potential Emission (ton/yr) =
Max. Hourly Throughput (1000 gal/hr) * Emission Factor (lb/1000 gal throughput) * 8760 (hr/yr) / 2000 (lb/ton)
Limited Emission (ton/yr) =
Limited Annual Throughput (mmgal/yr) * 1000 (1000/million) * Emission Factor (lb/1000 gal throughput) / 2000 (lb/ton)
Pursuant to 326 IAC 8-4-4, allowable VOC emissions are 80 mg/1000 liter loaded
Allowable VOC emissions = 80 mg/liter * 612 (1000 gal/hr) * 3.78 liter/gal * (1/453,590) lb/mg * (1/2000) (ton/lb) * 8760 (hr/yr) * (1/1000)
= 1787.1 ton/yr

**Appendix A: Emission Calculations
Insignificant Internal Combustion Engines**

Company Name: ConocoPhillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Permit No.: T089-16208-00326
Reviewer: Timothy R. Pettifor
Date: August 5, 2008

Emissions Factors for Internal Combustion Engines

	Diesel (lb/hp-hr)	Gasoline (lb/hp-hr)
NOx	0.0310	0.0110
SO2	0.0021	0.0006
CO	0.0068	0.4390
PM	0.0022	0.0007
VOC	0.0025	0.0150

Each of the listed engines qualify as an insignificant activity with maximum annual operation of 500 hours

Emission Unit ID	Name (fuel)	Size (hp)	Annual Hours in Service	Emissions (tons/yr)				
				NOx	SO2	CO	PM	VOC
IC-1	Fire Pump (Diesel)	32	500	0.25	0.02	0.05	0.02	0.02
IC-2	Air Compressor (Diesel)	52	500	0.40	0.03	0.09	0.03	0.03
IC-3	Welding Machine (Diesel)	32	500	0.25	0.02	0.05	0.02	0.02
IC-4	Vaccum Wagon (Diesel)	18	500	0.14	0.01	0.03	0.01	0.01
IC-5	Port. Generator (Diesel)	7	500	0.05	0.00	0.01	0.00	0.00
IC-6	Water Blaster (Gasoline)	7	500	0.02	0.00	0.77	0.00	0.03
Total				1.11	0.08	1.01	0.08	0.11

Note:
Emission factors used are from AP-42, Table 3-3.1