



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

Ms. Natalie Grimmer
BP Products North America, Inc. - Whiting Business Unit
757 River Oaks Drive
Calumet City, Illinois 60409-5116

February 14, 2011

Re: Approval for a Temporary Operation and an
Experimental Trial
EX No. 089-30169-00453

Dear Ms. Grimmer:

On February 1, 2011, BP Products North America, Inc. – Whiting Business Unit submitted a letter informing the Office of Air Quality (OAQ) of the intention to conduct a temporary operation and experimental trial related to contractual performance testing of the HU Heater HU-2. The objective of the test is to determine the steam and hydrogen quantities and purities, and perform environmental compliance testing. Since the new high pressure steam and hydrogen lines capable of handling the HU Heater HU-2 output have not yet been constructed, existing low pressure steam and hydrogen lines will be utilized. The connection between the HU Heater HU-2 and the existing low pressure lines will be disconnected upon completion of the testing. Because there is not sufficient capacity in these lines and the HU Heater HU-2 will be tested at full capacity, much of the steam and hydrogen generated will need to be vented or flared at the HU Flare system. The venting and flaring of steam and hydrogen is not typical. Under normal operations, venting is minimal and hydrogen flaring only occurs during startup as the product is brought up to grade. Therefore, the emissions associated with venting and flaring during this demonstration are considered temporary. These temporary operations and experimental trials that involve construction, reconstruction, or modification have a potential emissions increase from the modification that is less than twenty-five (25) tons for the duration of the operation, and the purpose of the construction, reconstruction, or modification is to make process improvements and pollution prevention.

Experimental Operation General Information

Purpose of the Experimental Trial:	To demonstrate that the HU Heater HU-2 is capable of producing steam and hydrogen in quantities and purities required and that the HU Heater HU-2 will meet the emission limitations and other requirements specified in Part 70 Operating Permit No. T089-6741-00453.
Units:	(a) One (1) HU Heater HU-2 (b) HU Flare system
Location of the Operation:	2815 Indianapolis Blvd, Whiting, Indiana
County:	Lake
County Status:	Attainment or unclassifiable for all criteria pollutants Basic nonattainment designation effective federally April 5, 2005, for PM _{2.5} .

Starting Date of the Operation: February 28, 2011
Duration of the Operation: Less than 30 days of actual operation
Testing parameters: NO_x, ethanol, and ammonia.

Applicable Requirements

Pursuant to 326 IAC 2-1.1-3(h) (Exemption for Temporary Operation and Experimental Trial), the above mentioned temporary operation and experimental trial shall satisfy the following requirements:

1. The potential emissions from the operation are less than 25 tons per year for the duration of the operation. [326 IAC 2-1.1-3(h)(3)(A)]
2. The operation is not a major source or modification as defined under 326 IAC 2-2, or 326 IAC 2-7. [326 IAC 2-1.1-3(h)(3)(B)]
3. The purpose of the operation is to:
 - (a) collect data for experimental purposes, including, but not limited to, process improvements, new product development, and pollution prevention; or [326 IAC 2-1.1-3(h)(3)(C)(i)]
 - (b) temporarily conduct an operation not considered as part of the normal operation or production of the facility or source. [326 IAC 2-1.1-3(h)(3)(C)(ii)]
4. The duration of the temporary operation or experimental trial is less than 30 days of total operating time. [326 IAC 2-1.1-3(h)(3)(D)]
5. The Permittee shall submit a report containing the following information, at most seven (7) days after the conclusion of the temporary operation: [326 IAC 2-1.1-3(h)(3)(G)]
 - (a) The actual dates of the construction and operation.
 - (b) The duration of the operation.
 - (c) The actual emissions occurring during the operation.
6. The report shall be submitted to:

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

Expiration Date

This approval expires after 30 days of actual operating time of the temporary operation and experimental trial related to the demonstration of the HU Heater HU-2 production capacities.

IDEM Contact

If you have any questions regarding this approval, please contact Jenny Acker of my staff at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-9327 or toll free at 1-800-451-6027, extension 3-9327.

Sincerely,



Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Enclosure: Temporary Operation and Experimental Trial Report

cc: File – Lake County
Lake County Health Department
Northwest Regional Office
Air Compliance Inspector – Ramesh Tejuja

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

Temporary Operation and Experimental Trial Report

Source Name: BP Products North America, Inc. – Whiting Business Unit
Source Location: 2815 Indianapolis Blvd Whiting IN 46394
County Location: Lake
Experimental Operation: 089-30169-00453

Experimental Operation	
Type of unit/operation:	
Actual starting date of the construction:	
Actual ending date of the construction:	
Actual starting date of the operation:	
Actual ending date of the operation:	
Actual number of days of the operation:	
Calculated emissions during the duration of the operation:	
Additional Comments:	

I certify under penalty of law that this report was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

cc: Air Compliance Inspector – Ramesh Tejuja



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SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Natalie Grimmer
BP Products North America - Whiting Business Unit
757 River Oaks Dr
Calumet City, IL 60409-5116

DATE: February 14, 2011

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

SUBJECT: Final Decision
Temporary Operation
089-30169-00453

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	CDENNY 2/14/2011 BP Products North America - Whiting Business Unit 089-30169-00453 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	 Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

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1		Natalie Grimmer BP Products North America - Whiting Business Unit 757 River Oaks Dr Calumet City IL 60409-5116 (Source CAATS)										
2		Nick Spencer Whiting Business Unite Leader BP Products North America - Whiting Business Unit 2815 Indianapolis Blvd, PO Box Whiting IN 46394-0710 (RO CAATS)										
3		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)										
4		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
5		Hammond City Council and Mayors Office 5925 Calumet Avenue Hammond IN 46320 (Local Official)										
6		Whiting City Council and Mayors Office 1143 119th St Whiting IN 46394 (Local Official)										
7		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)										
8		Laura Lodisio US EPA Region 5 (D-8J) 77 W. Jackson Blvd. Chicago IL 60604 (EPA)										
9		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)										
10		Susan Severtson City of Gary Law Dept. 401 Broadway 4th Floor Gary IN 46402 (Local Official)										
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