



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: April 18, 2011

RE: BP Products North America / 097 - 30347 - 00076

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

## Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER-AM.dot12/3/07



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April 18, 2011

William Fenton  
BP Products North America, Inc.  
2500 North Tibbs Avenue  
Indianapolis, IN 46222

Re: 097-30347-00076  
Second Administrative Amendment to  
F097-25559-00076

Dear Mr. Fenton:

BP Products North America Inc. - Indianapolis Terminal was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F097-25559-00076 on March 26, 2009 for a stationary petroleum product loading terminal located at 2500 N. Tibbs Ave, Indianapolis, IN 46222. On March 14, 2011, the Office of Air Quality (OAQ) received an application from the source relating to construction and operation of one (1) groundwater pump and treatment system for the removal of petroleum hydrocarbons from extracted groundwater at the site. The addition of this unit to the permit is considered an administrative amendment since the potential emissions of regulated criteria pollutants and hazardous air pollutants are less than the ranges specified 326 IAC 2-8-11.1(d)(4) and 326 IAC 2-8-11.1(f)(1)(G), respectively. The entire source will continue to limit VOC emissions to less than 100 tons per twelve (12) consecutive month period, rendering the requirements of 326 IAC 2-7 not applicable. The addition of these units will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3. Pursuant to the provisions of 326 IAC 2-8-10, the permit is hereby administratively amended as follows with the deleted language as ~~strikeouts~~ and new language **bolded**:

The permit has been revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

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

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

...

- (I) **One (1) groundwater remediation system utilizing air stripping, identified as AS1, approved for construction in 2011, with a maximum water flow rate of two hundred (200) gallons per minute (gpm), using carbon adsorption canisters, as needed, for VOC control, and exhausting to stack Stat 180.**

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Meredith Jones, of my staff, at 317-234-5176 or 1-800-451-6027, and ask for extension 4-5176.

Sincerely,

A handwritten signature in black ink, appearing to read "Alfred C. Dumaul". The signature is fluid and cursive, with a large initial "A" and a long, sweeping tail.

Alfred C. Dumaul, Ph. D., Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Updated Permit  
Updated Calculations  
Technical Support Document

ACD/MWJ

cc: File - Marion County  
Marion County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch  
Billing, Licensing and Training Section



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**Federally Enforceable State Operating Permit  
Renewal**

**OFFICE OF AIR QUALITY**

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

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

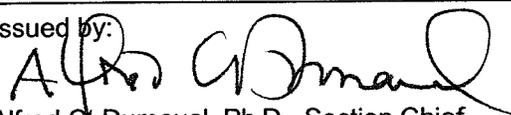
**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F097-25559-00076	
Issued by: <i>Original Signed by:</i> Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: March 26, 2009  Expiration Date: March 26, 2019

First Administrative Amendment No. 097-29901-00076, issued on January 3, 2011.

Second Administrative Amendment No.: 097-30347-00076	
Issued by:  Alfred C. Dumauval, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date:  April 18, 2011 Expiration Date: March 26, 2019

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## SECTION A SOURCE SUMMARY

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

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

---

The Permittee owns and operates a stationary petroleum product loading terminal.

Source Address:	2500 North Tibbs Avenue, Indianapolis, Indiana 46222
General Source Phone Number:	317-926-5471
SIC Code:	5171
County Location:	Marion
Source Location Status:	Nonattainment for PM <sub>2.5</sub> standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Nonattainment New Source Review Rules Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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

---

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

- (a) One (1) loading rack for dispensing of petroleum product, with one (1) carbon adsorber, identified as V10, for control of volatile organic compounds. Loading rack installed in 1993.  
  
Under 40 CFR Part 60, Subpart XX and 40 CFR Part 63, Subpart BBBB, the petroleum products loading rack is an affected facility.
- (b) Storage tank # 1, equipped with a fixed roof, 1,365,000 gallons storage capacity, used to store HS diesel, and constructed in 1941.
- (c) Storage tank #2, equipped with an external pontoon floating roof with a dome, 672,000 gallon storage capacity, used to store Slop interface, and constructed in 1940.
- (d) Storage tank #3, equipped with an external pontoon floating roof with a dome, 672,000 gallon storage capacity, used to store ethanol, and constructed in 1941.
- (e) Storage tank # 4, equipped with a fixed roof, 1,365,000 gallon storage capacity, used to store LS diesel supreme, and constructed in 1941.
- (f) Storage tank # 5, equipped with an internal floating roof as of 2010, 1,365,000 gallon storage capacity, used to store ethanol or distillate fuel oil, constructed in 1941.
- (g) Storage tank #6, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store Subgrade/regular gasoline, and constructed in 1941.

Under 40 CFR Part 63, Subpart BBBB, Storage tank #6 is an affected facility.

- (h) Storage tank #7, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store Subgrade/ regular gasoline, and constructed in 1941.  
  
Under 40 CFR Part 63, Subpart BBBB, Storage tank #7 is an affected facility.
- (i) Storage tank #8, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store Premium gasoline, and constructed in 1942.  
  
Under 40 CFR Part 63, Subpart BBBB, Storage tank #8 is an affected facility.
- (j) Storage tank # 10, equipped with a fixed roof, 92,400 gallon storage capacity, used to store Slop diesel, and constructed in 1941.
- (k) Storage tank # 11, equipped with a fixed roof, 3,360,000 gallon storage capacity, used to store LS diesel, and constructed in 1970.
- (l) One (1) groundwater remediation system utilizing air stripping, identified as AS1, approved for construction in 2011, with a maximum water flow rate of two hundred (200) gallons per minute (gpm), using carbon adsorption canisters, as needed, for VOC control, and exhausting to stack Stat 180.

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

This stationary source also includes the following insignificant activities:

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

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

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2 (a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-8-1]

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

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

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- (a) This permit, F097-25559-00076, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

### B.4 Enforceability [326 IAC 2-8-6][IC 13-17-12]

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Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Severability [326 IAC 2-8-4(4)]

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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- (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. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:
- Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (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.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility and its control device:

- (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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(c) 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.

The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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

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- (a) All terms and conditions of permits established prior to F097-25559-00076 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

**B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.15 Reserved**

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

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(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g) in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

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

#### C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

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The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

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The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any

monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

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

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

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Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

#### **C.11 Reserved**

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

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

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

#### **C.13 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]**

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

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

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Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response steps include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test. 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 no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

### **C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]**

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- (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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

### **C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]**

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- (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 except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## **Stratospheric Ozone Protection**

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

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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 applicable standards for recycling and emissions reduction.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

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

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

Under 40 CFR Part 60, Subpart XX and 40 CFR Part 63, Subpart BBBB, the petroleum products loading rack is an affected facility.

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

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

#### D.1.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) [326 IAC 2-8-4][40 CFR 63 Subpart R][326 IAC 20]

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

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

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

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

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

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

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

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

- (a) No person shall allow a gasoline transport that is subject to this rule and that has a capacity of two thousand (2,000) gallons or more to be filled or emptied unless the gasoline transport completes the following:
- (1) Annual leak detection testing before the end of the twelfth calendar month following the previous year's test, according to test procedures contained in 40 CFR 63.425 (e), as follows:
    - (A) Conduct the pressure and vacuum tests for the transport's cargo tank using a time period of five (5) minutes. The initial pressure for the pressure test shall be four hundred sixty (460) millimeters H<sub>2</sub>O (eighteen (18) inches H<sub>2</sub>O) gauge. The initial vacuum for the vacuum test shall be one hundred fifty (150) millimeters H<sub>2</sub>O (six (6) inches H<sub>2</sub>O) gauge. The maximum allowable pressure or vacuum change is twenty-five (25) millimeters H<sub>2</sub>O (one (1) inch H<sub>2</sub>O) in five (5) minutes.
    - (B) Conduct the pressure test of the cargo tank's internal vapor valve as follows:
      - (i) After completing the test under clause (A), use the procedures in 40 CFR 60, Appendix A, Method 27 to repressurize the tank to four hundred sixty (460) millimeters H<sub>2</sub>O (eighteen (18) inches H<sub>2</sub>O) gauge. Close the transport's internal vapor valve or valves, thereby isolating the vapor return line and manifold from the tank.
      - (ii) Relieve the pressure in the vapor return line to atmospheric pressure, then reseal the line. After five (5) minutes, record the gauge pressure in the vapor return line and manifold. The maximum allowable five (5) minute pressure increase is one hundred thirty (130) millimeters H<sub>2</sub>O (five (5) inches H<sub>2</sub>O).
  - (2) Repairs by the gasoline transport owner or operator, if the transport does not meet the criteria of subdivision (1), and retesting to prove compliance with the criteria of subdivision (1).

- (b) The annual test data remain valid until the end of the twelfth calendar month following the test. The owner of the gasoline transport shall be responsible for compliance with subsection (b) and shall provide the owner of the loading facility with the most recent valid modified 40 CFR 60, Appendix A, Method 27 test results upon request. The owner of the loading facility shall take all reasonable steps, including reviewing the test date and tester's signature, to ensure that gasoline transports loading at its facility comply with subsection (a).
- (c) The owner or operator of a vapor balance system or vapor control system subject to this rule shall:
  - (1) design and operate the applicable system and the gasoline loading equipment in a manner that prevents:
    - (A) gauge pressure from exceeding four thousand five hundred (4,500) pascals (eighteen (18) inches of H<sub>2</sub>O) and a vacuum from exceeding one thousand five hundred (1,500) pascals (six (6) inches of H<sub>2</sub>O) in the gasoline transport;
    - (B) except for sources subject to 40 CFR 60.503(b) (NESHAP/MACT) or 40 CFR 63. 425(a) (New Source Performance Standards) requirements, a reading equal to or greater than twenty-one thousand (21,000) parts per million as propane, from all points on the perimeter of a potential leak source when measured by the method referenced in 40 CFR 60, Appendix A, Method 21, or an equivalent procedure approved by the commissioner during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and
    - (C) avoidable visible liquid leaks during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and
  - (2) within fifteen (15) days, repair and retest a vapor balance, collection, or control system that exceeds the limits in subdivision (1).
- (d) The department may, at any time, monitor a gasoline transport, vapor balance, or vapor control system to confirm continuing compliance with subsection (a) or (b).
- (e) If the commissioner allows alternative test procedures in subsection (a)(1) or (c)(1)(B), such method shall be submitted to the U.S. EPA as a SIP revision.
- (f) During compliance tests conducted under 326 IAC 3-6 (stack testing), each vapor balance or control system shall be tested applying the standards described in subsection (c)(1)(B). Testers shall use 40 CFR 60, Appendix A, Method 21 to determine if there are any leaks from the hatches and the flanges of the gasoline transports. If any leak is detected, the transport cannot be used for the capacity of the compliance test of the bulk gas terminal. The threshold for leaks shall be as follows:
  - (1) Five hundred (500) parts per million methane for all bulk gas terminals subject to NESHAP/MACT (40 CFR 63, Subpart R).
  - (2) Ten thousand (10,000) parts per million methane for all bulk gas terminals subject to a New Source Performance Standard.

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

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A Preventive Maintenance Plan is required for the loading rack and carbon adsorber vapor

recovery unit. Section B – Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.

### **Compliance Determination Requirements**

#### **D.1.5 VOC and HAP**

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

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

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- (a) To demonstrate compliance with Condition D.1.1(a), a compliance stack test shall be performed no later than five (5) years from the date of the most recent valid compliance demonstration, at the exhaust of the carbon adsorber vapor recovery unit. This test shall be performed according to 40 CFR 60, Appendix A, Methods 25 and 25A.
- (b) If the commissioner allows alternative test procedures, such method shall be submitted to the U.S. EPA as a SIP revision.
- (c) During compliance tests conducted under 326 IAC 3-6 (stack testing), each vapor balance or control system shall be tested applying the standards described in 40 CFR Part 60 Subpart XX. Testers shall use 40 CFR 60, Appendix A, Method 21 to determine if there are any leaks from the hatches and the flanges of the gasoline transports. If any leak is detected, the transport cannot be used for the capacity of the compliance test of the bulk gas terminal. The threshold for leaks shall be as follows:
  - (1) Five hundred (500) parts per million methane for all bulk gas terminals subject to NESHAP/MACT (40 CFR 63, Subpart R).
  - (2) Ten thousand (10,000) parts per million methane for all bulk gas terminals subject to a New Source Performance Standard.

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

#### **D.1.7 Carbon Adsorber**

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

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

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

### D.1.8 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.1.1(a), the Permittee shall maintain records at the source of the volume in gallons of each fuel dispensed at the loading rack, including purchase orders and invoices necessary to verify the type and amount dispensed;
- (b) To document the compliance status with D.1.3(f), the owner or operator of a vapor balance or vapor control system subject to this section shall maintain records of all compliance testing. The records shall identify the following:
- (1) The vapor balance, vapor collection, or vapor control system.
  - (2) The date of the test and, if applicable, retest.
  - (3) The results of the test and, if applicable, retest.
- The records shall be maintained in a legible, readily available condition for at least two (2) years after the date the testing and, if applicable, retesting were completed.
- (c) To document the compliance status with Condition D.1.3(a), the owner or operator of a gasoline transport subject to this section shall keep a legible copy of the transport's most recent valid annual modified 40 CFR 60, Appendix A, Method 27 test either in the cab of the transport or affixed to the transport trailer. The test record shall identify the following:
- (1) The gasoline transport.
  - (2) The type and date of the test and, if applicable, date of retest.
  - (3) The test methods, test data, and results certified as true, accurate, and in compliance with this rule by the person who performs the test.
- This copy shall be made available immediately upon request to the department and to the owner of the loading facility for inspection and review. The department shall be allowed to make copies of the test results.
- (d) To document the compliance status with Condition D.1.7, the Permittee shall maintain records of the following operation parameters of the carbon adsorber vapor recovery unit:
- (1) bed pressure; and
  - (2) vacuum level.
- (e) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

### D.1.9 Reporting Requirements

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A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the period being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

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

- (b) Storage tank # 1, equipped with a fixed roof, 1,365,000 gallons storage capacity, used to store HS diesel, and constructed in 1941.
- (c) Storage tank #2, equipped with an external pontoon floating roof with a dome, 672,000 gallon storage capacity, used to store Slop interface, and constructed in 1940.
- (d) Storage tank #3, equipped with an external pontoon floating roof with a dome, 672,000 gallon storage capacity, used to store ethanol, and constructed in 1941.
- (e) Storage tank # 4, equipped with a fixed roof, 1,365,000 gallon storage capacity, used to store LS diesel supreme, and constructed in 1941.
- (f) Storage tank # 5, equipped with an internal floating roof as of 2010, 1,365,000 gallon storage capacity, used to store ethanol or distillate fuel oil, constructed in 1941.
- (g) Storage tank #6, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store Subgrade/regular gasoline, and constructed in 1941.  
  
Under 40 CFR Part 63, Subpart BBBBBB, Storage tank #6 is an affected facility.
- (h) Storage tank #7, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store Subgrade/ regular gasoline, and constructed in 1941.  
  
Under 40 CFR Part 63, Subpart BBBBBB, Storage tank #7 is an affected facility.
- (i) Storage tank #8, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store Premium gasoline, and constructed in 1942.  
  
Under 40 CFR Part 63, Subpart BBBBBB, Storage tank #8 is an affected facility.
- (j) Storage tank # 10, equipped with a fixed roof, 92,400 gallon storage capacity, used to store diesel, and constructed in 1941.
- (k) Storage tank # 11, equipped with a fixed roof, 3,360,000 gallon storage capacity, used to store LS diesel, and constructed in 1970.

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

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

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

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

- (a) The tanks shall be retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with an equally effective alternative control which has been approved.
- (b) The tanks shall be maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.

- (c) All openings, except stub drains, shall be equipped with covers, lids, or seals such that:
  - (1) the cover, lid, or seal is in the closed position at all times except when in actual use;
  - (2) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supporters; and
  - (3) rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

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

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A Preventive Maintenance Plan is required for these tanks and their floating roofs (as applicable). Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

**D.2.3 Monitoring**

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

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

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

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

### SECTION D.3 EMISSION UNIT OPERATION CONDITION

Insignificant emitting activities consisting of the following:

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

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

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

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

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

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

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

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility existing prior to January 1, 1980 shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

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

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

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

**SECTION E.1 FACILITY OPERATION CONDITIONS - 40 CFR 60, Subpart XX - New Source Performance Standards for Bulk Gasoline Terminals**

**Facility Description [326 IAC 2-8-4(10)]:**

**Emission Units**

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

Under 40 CFR Part 60, Subpart XX and 40 CFR Part 63, Subpart BBBBBB, the petroleum products loading rack is an affected facility.

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

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

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

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

**E.1.2 New Source Performance Standards (NSPS) Standards of Performance for Bulk Gasoline Terminals [326 IAC 12][40 CFR Part 60, Subpart XX]**

The Permittee which operates a bulk gasoline terminal loading rack shall comply with the following provisions of 40 CFR Part 60, Subpart XX (included as Attachment A of this permit):

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

**SECTION E.2 FACILITY OPERATION CONDITIONS - 40 CFR 63, Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities**

**Facility Description [326 IAC 2-8-4(10)]:**

**Emission Units**

- (a) One (1) loading rack for dispensing of petroleum product, with one (1) carbon adsorber, identified as V10, for control of volatile organic compounds. Loading rack installed in 1993.
- Under 40 CFR Part 60, Subpart XX, the petroleum products loading rack is an affected facility. Under 40 CFR Part 63, Subpart BBBBBB, the petroleum products loading rack is an affected facility.
- (g) Storage tank #6, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store Subgrade/regular gasoline, and constructed in 1941.
- Under 40 CFR Part 63, Subpart BBBBBB, Storage tank #6 is an affected facility.
- (h) Storage tank #7, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store Subgrade/ regular gasoline, and constructed in 1941.
- Under 40 CFR Part 63, Subpart BBBBBB, Storage tank #7 is an affected facility.
- (i) Storage tank #8, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store Premium gasoline, and constructed in 1942.
- Under 40 CFR Part 63, Subpart BBBBBB, Storage tank #8 is an affected facility.

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

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

**E.2.1 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]**

- (a) Pursuant to 40 CFR 63.11098, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the bulk gasoline terminal as specified in Table 3 of 40 CFR Part 63, Subpart BBBBBB in accordance with the schedule in 40 CFR 63, Subpart BBBBBB.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:
- Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

**E.2.2 National Emissions Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities [40 CFR Part 63, Subpart BBBBBB]**

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart BBBBBB

(included as Attachment B) which are incorporated by reference as 326 IAC 20-1 for the bulk gasoline terminal:

- (1) 40 CFR 63.11080
- (2) 40 CFR 63.11081(a)(1),(b)
- (3) 40 CFR 63.11082(a),(d)
- (4) 40 CFR 63.11083(b),(c)
- (5) 40 CFR 63.11087
- (6) 40 CFR 63.11088
- (7) 40 CFR 63.11089
- (8) 40 CFR 63.11092(a)(2),(b),(c),(d),(e)(2),(f)
- (9) 40 CFR 63.11093
- (10) 40 CFR 63.11094
- (11) 40 CFR 63.11095(a),(b)
- (12) 40 CFR 63.11098
- (13) 40 CFR 63.11099
- (14) 40 CFR 63.11100
- (15) Table 1
- (16) Table 2
- (17) Table 3

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

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

Source Name: BP Products North America Inc. Indianapolis Terminal  
Source Address: 2500 N. Tibbs, Indianapolis, Indiana 46222  
FESOP Permit No.: F097-25559-00076

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)\_\_\_\_\_
- Report (specify)\_\_\_\_\_
- Notification (specify)\_\_\_\_\_
- Affidavit (specify)\_\_\_\_\_
- Other (specify)\_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH**

**100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

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

Source Name: BP Products North America Inc. Indianapolis Terminal  
Source Address: 2500 N. Tibbs, Indianapolis, Indiana 46222  
FESOP Permit No.: F097-25559-00076

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

Page 2 of 2

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

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

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

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

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

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

### FESOP Quarterly Report

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

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

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

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

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: BP Products North America Inc. Indianapolis Terminal  
 Source Address: 2500 N. Tibbs, Indianapolis, Indiana 46222  
 FESOP Permit No.: F097-25559-00076

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

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

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

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

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

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

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

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

Technical Support Document (TSD) for an Administrative Amendment to a  
Federally Enforceable State Operating Permit (FESOP)

<b>Source Description and Location</b>
--

<b>Source Name:</b>	<b>BP Products North America Inc.- Indianapolis Terminal</b>
<b>Source Location:</b>	<b>2500 N. Tibbs Ave, Indianapolis, IN 46222</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>5171</b>
<b>Operation Permit No.:</b>	<b>F097-25559-00076</b>
<b>Operation Permit Issuance Date:</b>	<b>March 26, 2009</b>
<b>Administrative Amendment No.:</b>	<b>097-30347-00076</b>
<b>Permit Reviewer:</b>	<b>Meredith W. Jones</b>

On March 14, 2011, the Office of Air Quality (OAQ) received an application from BP Products North America Inc.- Indianapolis Terminal related to a modification to an existing stationary petroleum product loading terminal.

<b>Existing Approvals</b>
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The source was issued FESOP Renewal No. F097-25559-00076 on March 26, 2009. The source has since received the following approvals:

- (a) Administrative Amendment No. 097-29901-00076, issued on January 3, 2011.

<b>County Attainment Status</b>
---------------------------------

The source is located in Marion County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 <sup>th</sup> Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O <sub>3</sub>	Attainment effective November 8, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
<sup>1</sup> Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.  Basic nonattainment designation effective federally April 5, 2005, for PM <sub>2.5</sub> .	

- (a) **Ozone Standards**  
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
 Marion County has been classified as nonattainment for PM<sub>2.5</sub> in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM<sub>2.5</sub> emissions, and the effective date of these rules was July 15, 2008. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**  
 Marion County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

Since this source is classified as a “petroleum storage and transfer facility with a total storage capacity exceeding three hundred thousand (300,000) barrels” it is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2. Therefore, fugitive emissions are counted toward the determination of PSD and Part 70 Permit applicability.

**Status of the Existing Source**

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

Process (Emission Unit)	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Worst Single HAP
Fugitive for loading rack - Gasoline	negl.	negl.	negl.	negl.	negl.	15.00	negl.	0.90	0.57 (Hexane (-n))
Fugitive for loading rack - Distillate	negl.	negl.	negl.	negl.	negl.	2.70	negl.	-	-
VRU outlet	negl.	negl.	negl.	negl.	negl.	58.41	negl.	3.49	2.21 (Hexane (-n))
Gasoline Tanks (#3,#6,#7 and #8)	negl.	negl.	negl.	negl.	negl.	2.19	negl.	0.15	0.10 (Hexane (-n))
Distillate Tanks (#1,#4,#5, #10 and #11)	negl.	negl.	negl.	negl.	negl.	2.66	negl.	0.01	0.01 (Naphthalene)
Slop Tanks (#2)	negl.	negl.	negl.	negl.	negl.	0.41	negl.	-	-
Boilers: Fuel Oil Combustion	negl.	negl.	negl.	negl.	negl.	0.01	negl.	1.96 E-04	6.00E-05 (Selenium)
Insignificant Activities	0.06	0.06	0.06	2.03	0.57	10.24	0.14	0.61	0.39 (Hexane (-n))
<b>Total PTE of Entire Source</b>	<b>0.06</b>	<b>0.06</b>	<b>0.06</b>	<b>2.03</b>	<b>0.57</b>	<b>91.62</b>	<b>0.14</b>	<b>5.16</b>	<b>3.27 (Hexane (-n))</b>

<i>Process (Emission Unit)</i>	<b>Potential To Emit of the Entire Source Prior to Revision (tons/year)</b>								
	<i>PM</i>	<i>PM<sub>10</sub></i>	<i>PM<sub>2.5</sub></i>	<i>SO<sub>2</sub></i>	<i>NO<sub>x</sub></i>	<i>VOC</i>	<i>CO</i>	<i>Total HAPs</i>	<i>Worst Single HAP</i>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	100	100	100	100	100	100	100	NA	NA

negl. = negligible  
 These emissions are based upon the technical support document for FESOP Renewal No. F097-25559-00076, issued on March 26, 2009.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because while it is one of the twenty-eight listed source categories, as specified in 326 IAC 2-2-1(gg)(1), no attainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3), because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by BP Products North America Inc.- Indianapolis Terminal on March 14, 2011, relating to the construction and operation of one (1) groundwater pump and treatment system for the removal of removal of petroleum hydrocarbons from extracted groundwater at the site.

The following is a list of the new emission unit and pollution control device:

- (a) One (1) groundwater remediation system utilizing air stripping, identified as AS1, approved for construction in 2011, with a maximum water flow rate of two hundred (200) gallons per minute (gpm), using carbon adsorption canisters, as needed, for VOC control, and exhausting to stack Stat 180.

**Enforcement Issues**

There are no pending enforcement actions related to this revision.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – FESOP Revision**

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process (Emission Unit)	PTE of Proposed Revision (tons/year)								
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Worst Single HAP
Site Remediation: Air Stripping (AS1)	negl.	negl.	negl.	negl.	negl.	5.15	negl.	4.81	2.41 (xylene)
<b>Total PTE of Proposed Revision</b>	<b>negl.</b>	<b>negl.</b>	<b>negl.</b>	<b>negl.</b>	<b>negl.</b>	<b>5.15</b>	<b>negl.</b>	<b>4.81</b>	<b>2.41</b> (xylene)

negl. = negligible  
 \*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

This FESOP is being revised through an administrative amendment since the potential emissions of regulated criteria pollutants and hazardous air pollutants are less than the ranges specified 326 IAC 2-8-11.1(d)(4) and 326 IAC 2-8-11.1(f)(1)(G), respectively.

**PTE of the Entire Source After Issuance of the FESOP Revision**

The table below summarizes the potential to emit of the entire source (**reflecting adjustment of existing limits**), with updated emissions shown as **bold** values and previous emissions shown as ~~values~~.

Process (Emission Unit)	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Worst Single HAP
Fugitive for loading rack - Gasoline	negl.	negl.	negl.	negl.	negl.	15.00	negl.	0.90	0.57 (Hexane (-n))
Fugitive for loading rack - Distillate	negl.	negl.	negl.	negl.	negl.	2.70	negl.	-	-
VRU outlet	negl.	negl.	negl.	negl.	negl.	58.41	negl.	3.49	2.21 (Hexane (-n))
Gasoline Tanks (#3,#6,#7 and #8)	negl.	negl.	negl.	negl.	negl.	2.19	negl.	0.15	0.10 (Hexane (-n))
Distillate Tanks (#1,#4,#5, #10 and #11)	negl.	negl.	negl.	negl.	negl.	2.66	negl.	0.01	0.01 (Naphthalene)
Slop Tanks (#2)	negl.	negl.	negl.	negl.	negl.	0.41	negl.	-	-
Boilers: Fuel Oil Combustion	negl.	negl.	negl.	negl.	negl.	0.01	negl.	1.96 E-04	6.00E-05 (Selenium)
Insignificant Activities	0.06	0.06	0.06	2.03	0.57	10.24	0.14	0.61	0.39 (Hexane (-n))
<b>Site Remediation: Air Stripping (AS1)</b>	<b>negl.</b>	<b>negl.</b>	<b>negl.</b>	<b>negl.</b>	<b>negl.</b>	<b>5.15</b>	<b>negl.</b>	<b>4.81</b>	<b>2.41</b> (xylene)
Total PTE of Entire Source	0.06	0.06	0.06	2.03	0.57	<del>91.62</del> <b>96.77</b>	0.14	<del>5.16</del> <b>9.98</b>	3.27 (Hexane (-n))
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	100	100	100	100	100	100	100	NA	NA

negl. = negligible

- (a) *FESOP Status*  
This revision to an existing Title V minor stationary source will not change the minor status because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).
- (b) *PSD Minor Source*  
This modification to an existing PSD minor stationary source will not change the PSD minor status because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

#### **Federal Rule Applicability Determination**

##### New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

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

- (b) The one (1) groundwater remediation system utilizing air stripping, identified as AS1, is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants: Site Remediation (40 CFR 63, Subpart GGGGG) (326 IAC 20-87) because the source is not a major source of HAPs.

##### Compliance Assurance Monitoring (CAM)

- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

#### **State Rule Applicability Determination**

The following state rules are applicable to the proposed revision:

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

This revision to an existing Title V minor stationary source will not change the minor status because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

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

This modification to an existing PSD minor stationary source will not change the PSD minor status because the potential to emit of all regulated attainment pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

##### **326 IAC 2-3 (Emission Offset) and (for PM<sub>2.5</sub> nonattainment counties) 326 IAC 2-1.1-5 (Nonattainment New Source Review)**

This modification to an existing Emission Offset minor stationary source will not change the Emission Offset minor status because the potential to emit of all regulated nonattainment pollutants from the entire source will continue to be less than the Emission Offset major source threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

This modification to an existing minor stationary source under 326 IAC 2-1.1-5 (Nonattainment New Source Review) will not change the minor status because the potential to emit of PM<sub>2.5</sub> from the entire source will continue to be less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

### **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs))**

The proposed revision is not subject to the requirements of 326 IAC 2-4.1 because the unlimited potential to emit of HAPs from the new unit is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

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

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

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

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### Site Remediation

### **326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**

The one (1) groundwater remediation system utilizing air stripping, identified as AS1, is not subject to the requirements of 326 IAC 8-1-6 since the unlimited potential VOC emissions from this emission unit are less than twenty-five (25) tons per year.

### **326 IAC 12 (New Source Performance Standards)**

See Federal Rule Applicability Section of this TSD.

### **326 IAC 20 (Hazardous Air Pollutants)**

See Federal Rule Applicability Section of this TSD.

## **Compliance Determination, Monitoring and Testing Requirements**

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No. F097-25559-00076 issued on March 26, 2009.

## **Proposed Changes**

The changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

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

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

...

- (I) **One (1) groundwater remediation system utilizing air stripping, identified as AS1, approved for construction in 2011, with a maximum water flow rate of two hundred (200) gallons per minute (gpm), using carbon adsorption canisters, as needed, for VOC control, and exhausting to stack Stat 180.**

<b>Conclusion and Recommendation</b>
--------------------------------------

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 March 14, 2011.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Administrative Amendment Revision No. 097-30347-00076. The staff recommends to the Commissioner that this FESOP Administrative Amendment Revision be approved.

<b>IDEM Contact</b>
---------------------

- (a) Questions regarding this proposed permit can be directed to Meredith Jones at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5176 or toll free at 1-800-451-6027 extension 4-5176.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

Company Name: BP Products North America Inc.- Indianapolis Terminal  
 Address: 2500 N. Tibbs Ave, Indianapolis, IN 46222  
 Administrative Amendment No.: 097-30347-00076  
 Reviewer: Meredith W. Jones  
 Date: 3/24/11

**\*\*Potential to Emit Summary: Unlimited/Uncontrolled (tons/yr)\*\***

<b>Prior to Revision</b>				
<i>Facilities</i>	<i>VOC</i>	<i>Worst Single HAP</i>		<i>Total HAPs</i>
Fugitive for loading rack - Gasoline	15.00	0.57	Hexane (-n)	0.90
Fugitive for loading rack - Distillate	2.70	-	-	-
VRU outlet	1,602.70	60.73	Hexane (-n)	95.49
Gasoline Tanks (#3,#6,#7 and #8)	2.51	0.10	Hexane (-n)	0.15
Distillate Tanks (#1,#4,#5, #10 and #11)	2.66	0.01	Naphthalene	0.01
Slop Tanks (#2)	3.91	-		-
Boilers: Fuel Oil Combustion	0.01	6.00E-05	Selenium	1.96E-04
Insignificant Activities	10.24	0.39	Hexane (-n)	0.61
<b>Total</b>	<b>1,639.74</b>	<b>61.79</b>	<b>Hexane (-n)</b>	<b>97.16</b>

<b>New Unit</b>				
<i>Facilities</i>	<i>VOC</i>	<i>Worst Single HAP</i>		<i>Total HAPs</i>
Site Remediation: Air Stripping (AS1)	<b>4.81</b>	<b>2.41</b>	<b>xylene</b>	<b>4.81</b>

<b>After Revision</b>				
<i>Facilities</i>	<i>VOC</i>	<i>Worst Single HAP</i>		<i>Total HAPs</i>
Fugitive for loading rack - Gasoline	15.00	0.57	Hexane (-n)	0.90
Fugitive for loading rack - Distillate	2.70	-	-	-
VRU outlet	1,602.70	60.73	Hexane (-n)	95.49
Gasoline Tanks (#3,#6,#7 and #8)	2.51	0.10	Hexane (-n)	0.15
Distillate Tanks (#1,#4,#5, #10 and #11)	2.66	0.01	Naphthalene	0.01
Slop Tanks (#2)	3.91	-	0.00	-
Boilers: Fuel Oil Combustion	0.01	6.00E-05	Selenium	1.96E-04
Insignificant Activities	10.24	0.39	Hexane (-n)	0.61
Site Remediation: Air Stripping (AS1)	4.81	2.41	xylene	4.81
<b>Total</b>	<b>1,644.55</b>	<b>61.79</b>	<b>Hexane (-n)</b>	<b>101.97</b>

Company Name: BP Products North America Inc.- Indianapolis Terminal

Address: 2500 N. Tibbs Ave, Indianapolis, IN 46222

Administrative Amendment No.: 097-30347-00076

Reviewer: Meredith W. Jones

Date: 3/24/11

**\*\*Potential to Emit Summary: Limited (tons/yr)\*\***

<b>Prior to Revision</b>				
<i>Facilities</i>	<i>VOC</i>	<i>Worst Single HAP</i>		<i>Total HAPs</i>
Fugitive for loading rack - Gasoline	15.00	0.57	Hexane (-n)	0.90
Fugitive for loading rack - Distillate	2.70	-		-
VRU outlet	58.41	2.21	Hexane (-n)	3.49
Gasoline Tanks (#3,#6,#7 and #8)	2.19	0.10	Hexane (-n)	0.15
Distillate Tanks (#1,#4,#5, #10 and #11)	2.66	0.01	Naphthalene	0.01
Slop Tanks (#2)	0.41	-		-
Boilers: Fuel Oil Combustion	0.01	6.00E-05	Selenium	1.96E-04
Insignificant Activities	10.24	0.39	Hexane (-n)	0.61
<b>Total</b>	<b>91.62</b>	<b>3.27</b>	<b>Hexane (-n)</b>	<b>5.16</b>

<b>New Unit</b>				
<i>Facilities</i>	<i>VOC</i>	<i>Worst Single HAP</i>		<i>Total HAPs</i>
Site Remediation: Air Stripping (AS1)	<b>4.81</b>	<b>2.41</b>	<b>xylene</b>	<b>4.81</b>

<b>After the Revision</b>				
<i>Facilities</i>	<i>VOC</i>	<i>Worst Single HAP</i>		<i>Total HAPs</i>
Fugitive for loading rack - Gasoline	15.00	0.57	Hexane (-n)	0.90
Fugitive for loading rack - Distillate	2.70	-	0	-
VRU outlet	58.41	2.21	Hexane (-n)	3.49
Gasoline Tanks (#3,#6,#7 and #8)	2.19	0.10	Hexane (-n)	0.15
Distillate Tanks (#1,#4,#5, #10 and #11)	2.66	0.01	Naphthalene	0.01
Slop Tanks (#2)	0.41	-	0.00	-
Boilers: Fuel Oil Combustion	0.01	6.00E-05	Selenium	1.96E-04
Insignificant Activities	10.24	0.39	Hexane (-n)	0.61
Site Remediation: Air Stripping (AS1)	4.81	2.41	xylene	4.81
<b>Total</b>	<b>96.43</b>	<b>3.27</b>	<b>Hexane (-n)</b>	<b>9.98</b>

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

**Company Name: BP Products North America Inc.- Indianapolis Terminal**  
**Address: 2500 N. Tibbs Ave, Indianapolis, IN 46222**  
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**Loading Loss Emissions Calculations**

$$UE = (L/1000 \times GT)/2000$$

$$CVE = EL \text{ mg/l} \times GTG \text{ gal/yr} \times (CP \text{ lbs/mg} / CG \text{ gal/l})$$

$$DFE = ((GTD \times (Ld/1000))/2000)$$

$$GFE = ((GTG \times (Lg/1000))/2000) \times (1-CE)$$

Where:

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

UE = uncontrolled VOC emissions tons per year (worst case all gasoline, tons/yr)  
 CVE = controlled emission rate from VRU (gasoline, tons/yr)  
 KFE = VOC emissions tons per year (kerosene, tons/yr)  
 GFE = fugitive emissions from leaks in transports and VRU (gasoline, tons/yr)<sup>(a)</sup>

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

Data inputs for 12  
month rolling sum

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

1,602.70
58.41
2.70
15.00

76.11
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Pursuant to the Notice of Proposed Change to AP-42 Section 5.2, the collection efficiency for tanker trucks which meet annual pressure testing of 3 inches of water column pressure change for a five minute period when pressurized to a pressure of 6 inches of water is 98.7%

(a) Based on 9 mg/l (calculated using 0.5% as the average leakage from trucks passing the 3-inch pressure decay test (US EPA 1908: Bulk Gasoline Terminals)  
 (b) AP-42 Table 5.2-5 (0.0052 psia, submerged loading dedicated normal service).

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

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

**Gasoline Tank Information**

Tank #	Tank Volume (gal)	Turnovers	Throughput (gal)	Withdrawal Loss	Withdrawal Loss (lbs/1000 gal)	Standing Loss
3	672,000	37	24,864,000	78	0.003	639
6	3,150,000	37	116,550,000	183	0.002	1043
7	3,150,000	37	116,550,000	183	0.002	1043
8	3,150,000	37	116,550,000	183	0.002	1043
<b>Total</b>				<b>627</b>		<b>3,129</b>

Maximum Gasoline throughput (gal/yr)	400,000,000
Maximum withdrawal loss (lbs/1000 gal)	0.003
Maximum emissions from Withdrawal Loss (lbs/yr)	1,254.80
Standing Loss for Gasoline, (lbs/yr)	3129
<b>Total Emissions from Gasoline (tons/yr)</b>	<b>2.19</b>

**Distillate Tank Information**

Tank #	Tank Volume (gal)	Turnovers	Throughput (gal)	Withdrawal Loss	Withdrawal Loss (lbs/1000 gal)	Standing Loss
1	1,365,000	36	49,140,000	859	0.017	134
4	1,365,000	36	49,140,000	859	0.017	134
5	1,365,000	36	49,140,000	859	0.017	134
10	92,400	10	900,000	15	0.017	13
11	3,360,000	36	120,960,000	2075	0.017	326
<b>Total</b>				<b>4667</b>		<b>607</b>

Maximum distillate throughput (gal/yr)	270,000,000
Maximum withdrawal loss (lbs/1000 gal)	0.017
Maximum emissions from Withdrawal Loss (lbs/yr)	4,719.86
Standing Loss for Distillate, (lbs/yr)	607
<b>Total Emissions from Distillate (tons/yr)</b>	<b>2.66</b>

**Slop Tank Information**

Tank #	Tank Volume (gal)	Turnovers	Throughput (gal)	Withdrawal Loss	Withdrawal Loss (lbs/1000 gal)	Standing Loss
2	672,000	1.3	900,000	3	0.003	510
<b>Total (lbs/yr)</b>				<b>3</b>		<b>510</b>

Maximum slop throughput (gal/yr)	900,000
Maximum withdrawal loss (lbs/1000 gal)	0.333
Maximum emissions from Withdrawal Loss (lbs/yr)	300
Standing Loss for Slop, (lbs/yr)	510
<b>Total Emissions from Slop (tons/yr)</b>	<b>0.41</b>

**Appendix A: Emissions Calculations  
Boiler Inventory**

**Company Name: BP Products North America Inc.- Indianapolis Terminal**  
**Address: 2500 N. Tibbs Ave, Indianapolis, IN 46222**  
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Boilers

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

The following boilers are insignificant units as per 326 IAC 2-7-1 (21)(G)(i)(AA)(cc):  
Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) British thermal units per hour and firing fuel containing equal to or less than five-tenths percent (0.5%) sulfur by weight.

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

**Company Name: BP Products North America Inc.- Indianapolis Terminal**  
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Total Boilers (4)  
Heat Input Capacity  
MMBtu/hr  
0.913

Potential Throughput  
kgals/year  
57.13

S = Weight % Sulfur  
0.5

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

**Methodology**

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

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

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

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

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

See next page for HAPs emission calculations.

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

**Company Name: BP Products North America Inc.- Indianapolis Terminal  
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Reviewer: Meredith W. Jones  
Date: 3/24/11**

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

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

**Methodology**

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

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

**Total HAPs = 1.96E-04 tons/yr**

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

**Company Name: BP Products North America Inc.- Indianapolis Terminal**  
**Address: 2500 N. Tibbs Ave, Indianapolis, IN 46222**  
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<i>Emission Unit</i>	Potential Emissions (tons/yr)				
	VOC	SO <sub>2</sub>	NOx	PM	CO
Fugitive (Flanges and Valves)	0.475	not calculated			
Degreasing Operation	0.5336				
Tank 12, 8,000 gallon diesel tank	0.01				
Tank 13, 1,000 gallon gasoline tank	0.01				
Tank 14, Oil/water separator	0.05				
Tank 14a, 6,000 Oil/water separator UST	0.01				
Tank 15, 2,000 gallon pumpoff tank	0.15				
Tank 16, 1,100 gallon heater oil tank for shop	0.01				
Tank 17, 8,000 gallon UST	0.01				
Tank 18, 1,000 gallon furnace oil UST	0.01				
Tank 19, 500 gallon oil recycling tank	0.05				
Tank 20, 8,200 gallon OGA additive tank	0.01				
Tank 21, 2,000 gallon Guardian additive tank	0.001				
Tank 22, 1,000 gallon Infinieum additive tank	0.0001				
Tank 27, 1,000 gallon oil recovery tank	0.15				
Tank 24, 8,000 gallon additive tank	0.01				
Tank 25, 700 gallon additive tank	0.0004				
Tank 26, 350 gallon additive tank	0.0002				
Remediation system treating contaminated groundwater	2.74				
Other loading, refueling, lab, maintenance	6.00				
<b>Total</b>	<b>10.24</b>				

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

Company Name: BP Products North America Inc.- Indianapolis Terminal  
Address: 2500 N. Tibbs Ave, Indianapolis, IN 46222  
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	TOTAL VOC (tons/yr)	TOTAL VOC (lb/yr)	TOTAL HAP (tons/yr)	TOTAL HAP (lb/yr)	INDIVIDUAL HAPS (lb/yr)							
					HEXANE	BENZENE	TOLUENE	ISO-OCTANE	XYLENES	E. BENZENE	NAPHTHALENE	
<b>TANK EMISSIONS</b>												
<b>GASOLINE</b>												
Gasoline and Slop Tanks - Tanks #2. #3. #6. #7. #8	2.60	5,193.80	0.15	309.81								
	-	-	-	-								
<b>DIESEL</b>												
Diesel Tanks - #1. #4. #5. #10. #11	2.66	5,326.86	0.01	29.16								
	-	-	-	-								
<b>TANK TOTALS (lb/yr)</b>	<b>5.26</b>	<b>10,520.66</b>	<b>0.17</b>	<b>338.98</b>	<b>196.8</b>	<b>19.8</b>	<b>40.2</b>	<b>38.7</b>	<b>12.7</b>	<b>1.2</b>	<b>29.5</b>	
	-	-	-	-								
<b>LOADRACK EMISSIONS</b>												
<b>GASOLINE (uncontrolled)</b>												
GASOLINE (uncontrolled)	1,602.70	3,205,400.00	95.49	190,971.32	121,463.1	12,227.4	24,828.0	23,913.2	7,814.1	725.6	232.7	
GASOLINE (Controlled)	58.41	116,822.10	3.48	6,960.03	4,426.8	445.6	904.9	871.5	284.8	26.4	8.5	
	-	-	-	-								
GASOLINE (leaking trucks)	15.00	30,000.00	0.89	1,787.34	1,136.8	114.4	232.4	223.8	73.1	6.8	2.2	
	-	-	-	-								
<b>DIESEL</b>												
DIESEL	2.70	5,400.00	-	-	-	-	-	-	-	-	29.6	
	-	-	-	-								
<b>LOADRACK TOTALS</b>	<b>76.11</b>	<b>152,222.10</b>	<b>4.39</b>	<b>8,787.59</b>	<b>5,563.6</b>	<b>560.1</b>	<b>1,137.2</b>	<b>1,095.3</b>	<b>357.9</b>	<b>33.2</b>	<b>40.2</b>	
	-	-	-	-								
<b>Miscellaneous</b>	<b>10.24</b>	<b>20,484.7</b>	<b>0.610961</b>	<b>1,221.9</b>	<b>776.2</b>	<b>78.1</b>	<b>158.7</b>	<b>152.8</b>	<b>49.9</b>	<b>4.6</b>	<b>1.5</b>	
<b>GRAND TOTALS</b>												
lb/yr		183,227.4		10,348.5	6,536.6	658.0	1,336.1	1,286.9	420.5	39.0	71.2	
TPY	91.61			5.17	3.27	0.33	0.67	0.64	0.21	0.02	0.04	

NOTE:

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

**Appendix A: Emissions Calculations  
HAP Emissions**

**Company Name: BP Products North America Inc.- Indianapolis Terminal  
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Estimated Uncontrolled HAP emissions

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

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

Potential to Emit HAPs

Facilities	Benzene	Toluene	Ethylbenzene	Xylene (mixed isomers)	Isopropyl benzene	Naphthalene	Hexane (-n)	Isooctane	Total Emissions (lbs/yr)	Total Emissions (tons/yr)
Gasoline and Slop Tanks (#2, #3, #6, #7,	19.81	40.23	1.18	12.66	0.00	0.38	196.81	38.75	309.81	0.15
Distillate Tanks (#1, #4, #5, #10, #11)	0.00	0.00	0.00	0.00	0.00	29.16	0.00	0.00	29.16	0.01
Truck Rack Fugitives	114.44	232.37	6.79	73.13	1.78	2.18	1136.80	223.81	1791.30	0.90
VRU	445.63	904.87	26.44	284.79	8.17	8.48	4426.77	871.53	6976.68	3.49
Insignificant Activities	78.14	158.67	4.64	49.94		1.49	776.23	152.82	1221.92	0.61
<b>Total (lbs/yr)</b>	<b>658.02</b>	<b>1336.13</b>	<b>39.05</b>	<b>420.52</b>	<b>9.95</b>	<b>41.68</b>	<b>6536.61</b>	<b>1286.90</b>	<b>10328.87</b>	
<b>Total (tons/yr)</b>	<b>0.33</b>	<b>0.67</b>	<b>0.02</b>	<b>0.21</b>	<b>0.00</b>	<b>0.02</b>	<b>3.27</b>	<b>0.64</b>	<b>4.7872</b>	<b>5.16</b>

**Methodology**

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

Naphthalene is the only HAP present in diesel fuel per BP MSDS sheet # 11155.

Gasoline HAP speciation based on MSDS #12632 for BP unleaded gasoline

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

**Company Name: BP Products North America Inc.- Indianapolis Terminal**  
**Address: 2500 N. Tibbs Ave, Indianapolis, IN 46222**  
**Administrative Amendment No.: 097-30347-00076**  
**Reviewer: Meredith W. Jones**  
**Date: 3/24/11**

**\*\*Site Remediation: Air Stripping (AS1)\*\***

Concentrations were calculated by the Permittee and are based on the average of actual concentrations of each pollutant found in the groundwater from 2005 to the present.

pump flow rate: 200 gal/min = 757.08 L/min

<i>Pollutant</i>	<i>Concentration (µgm/L)</i>	<i>Potential VOC/HAP Emissions (lbs/hr)</i>	<i>Potential VOC/HAP Emissions (tons/yr)</i>
benzene	3000	0.30	1.31
toluene	60	0.01	0.03
ethylbenzene	2000	0.20	0.88
xylene	5500	0.55	2.41
naphthalene	418	0.04	0.18
ethanol	770	0.08	0.34
<b>Total</b>		<b>1.10</b>	<b>4.81</b>

**Methodology**

Potential VOC/HAP Emissions (lbs/hr) = Concentration (µgm/L) \* (1 gm/1,000,000 µgm) \* (1 lb/454 gm) \* pump flow rate (757.08 L/min) \* (60 min/hr)

Potential VOC/HAP Emissions (tons/hr) = Potential VOC/HAP Emissions (lbs/hr) \* (8760 hrs/yr) \* (1 ton/2000 lbs)



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

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

TO: Bill Fenton  
BP Products North America  
2500 N Tibbs Ave  
Indianapolis, In 46222-2127

DATE: April 18, 2011

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

SUBJECT: Final Decision  
FESOP - Administrative Amendment  
097 - 30347 - 00076

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:  
Peter R Charrington Stantec Consulting  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

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2		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)										
3		Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 (Affected Party)										
4		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
5		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
6		Ms. Kathy Watson 8204 Claridge Rd Indianapolis IN 46260 (Affected Party)										
7		Matt Mosier Office of Sustainability 2700 South Belmont Ave. Administration Bldg. Indianapolis IN 46221 (Local Official)										
8		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
9		Peter R Charrington Stantec Consulting, Inc 400 Davis Dr., Suite 400 Plymouth Meeting PA 19462 (Consultant)										
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