### 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

#### **NOTICE OF 30-DAY PERIOD** FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a Minor Source Operating Permit (MSOP)

for Marathon Pipe Line, LLC in Boone County

#### Permit No. M011-31081-00004

The Indiana Department of Environmental Management (IDEM) has received an application from Marathon Pipe Line, LLC located at 3178 East State Road 32, Lebanon, Indiana 46052 for a renewal of its MSOP issued on March 5, 2007. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Marathon Pipe Line, LLC to continue to operate its existing stationary source for storage and pipeline distribution of crude oil.

This draft MSOP Renewal does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed or removed. These corrections, changes, and removals may include Title I changes. This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow for these changes.

A copy of the permit application and IDEM's preliminary findings are available at:

Lebanon Public Library 104 East Washington Street Lebanon, IN 46052

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

#### How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit



application, please contact IDEM at the address below. Please refer to permit number M011-31081-00004 in all correspondence.

#### Comments should be sent to:

Nathan Bell IDEM, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251 (800) 451-6027, ask for extension (3-5670) Or dial directly: (317) 233-5670

Fax: (317)-232-6749 attn: Nathan Bell

E-mail: nbell@idem.in.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: <a href="https://www.idem.in.gov">www.idem.in.gov</a>.

#### What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions please contact Nathan Bell of my staff at the above address.

Iryn Calilyng, Section Chief

Permits Branch
Office of Air Quality



#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Mitchell E. Daniels Jr. Governor

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

## **Minor Source Operating Permit Renewal** OFFICE OF AIR QUALITY

Marathon Pipe Line, LLC 3178 East State Road 32 Lebanon, Indiana 46052

(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.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1. 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: M011-31081-00004							
Issued by:							
	Issuance Date:						
Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Expiration Date:						





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Permit Reviewer: Nathan C. Bell

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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 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary source for storage and pipeline distribution of crude oil.

Source Address: 3178 East State Road 32, Lebanon, Indiana 46052

General Source Phone Number: 419-421-3385

SIC Code: 4612 (Crude Petroleum Pipelines)

County Location: Boone

Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit Program

Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act

1 of 28 Source Categories

#### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) vertical external floating roof storage tank, identified as 14, installed in 1968, with an estimated maximum annual throughput of 34,370,028 gallons, maximum working volume: 5,728,338 gallons of crude oil.
- (b) One (1) vertical external floating roof storage tank, identified as 15, installed in 1968, with new primary and secondary seals installed in 2001 and an estimated maximum annual throughput of 34,324,668 gallons, maximum working volume: 5,720,778 gallons of crude oil
- (c) One (1) vertical external floating roof storage tank, identified as 16, installed in 1968, with an estimated maximum annual throughput of 34,119,792 gallons, maximum working volume: 5,686,632 gallons of crude oil.
- (d) One (1) vertical external floating roof storage tank, identified as 17, installed in 1968, with an estimated maximum annual throughput of 34,259,652 gallons, maximum working volume: 5,709,942 gallons of crude oil.
- (e) One (1) vertical external floating roof storage tank, identified as 18, installed in 1968, with new primary and secondary seals installed in 2002, with an estimated maximum annual throughput of 34,354,908 gallons, maximum working volume: 5,725,818 gallons of crude oil.
- (f) One (1) vertical external floating roof storage tank, identified as 2501, installed in 1979, with an estimated maximum annual throughput of zero (0) gallons, maximum working volume: 9,525,978 gallons of crude oil. This is an affected facility pursuant to 40 CFR 60, Subpart Ka.
- (g) Equipment leaks of VOC and HAP from flange/screwed connections, valves, pump seals, mixers, meters, strainers and/or other connectors.

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#### **SECTION B**

#### **GENERAL CONDITIONS**

#### B.1 Definitions [326 IAC 2-1.1-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

#### B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M011-31081-00004, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

#### B.4 Enforceability

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

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

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

#### B.7 Duty to Provide Information

- (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.

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#### B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 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

(c) The notification 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.

#### B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (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:
  - (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:

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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.
- (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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M011-31081-00004 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

#### B.12 Permit Renewal [326 IAC 2-6.1-7]

(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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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 Permit 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 one hundred twenty (120) days prior to the date of the expiration of this permit; and

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(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 2-6.1 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

#### B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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 Permit Administration and Support Section, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

#### B.14 Source Modification Requirement

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

#### B.15 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][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 permitted 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)

Lebanon, Indiana Permit Reviewer: Nathan C. Bell

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

#### B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

assuring compliance with this permit or applicable requirements.

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

#### B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) 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.18 Credible Evidence [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.

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#### **SECTION C**

#### **SOURCE OPERATION CONDITIONS**

#### **Entire Source**

#### Emission Limitations and Standards [326 IAC 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

#### 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]

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

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

The Permittee shall not operate an incinerator 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.

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

(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.

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(f) Demolition and Renovation

The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

#### Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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

(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.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

#### Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

#### C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

#### C.11 Instrument Specifications [326 IAC 2-1.1-11]

(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.

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(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**

#### C.12 Response to Excursions or Exceedances

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 may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - 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.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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.
- (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.

Marathon Pipe Line, LLC Lebanon, Indiana Permit Reviewer: Nathan C. Bell

#### Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

#### C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

#### C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, 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.16 General Reporting Requirements [326 IAC 2-1.1-11][326 IAC 2-6.1-2][IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

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

(b) 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.

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(c) 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.

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#### **SECTION D.1**

#### **EMISSIONS UNIT OPERATION CONDITIONS**

#### **Emissions Unit Description:**

(f) One (1) vertical external floating roof storage tank, identified as 2501, installed in 1979, with an estimated maximum annual throughput of zero (0) gallons, maximum working volume: 9,525,978 gallons of crude oil. This is an affected facility pursuant to 40 CFR 60, Subpart Ka.

(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 2-6.1-5(a)(1)]

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

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A General Provisions, which are incorporated by reference as 326 IAC 12-1, except as otherwise specified in 40 CFR 60, Subpart Ka, for the one (1) vertical external floating roof storage tank, identified as 2501.
- (b) Pursuant to 40 CFR 60.10, 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

D.1.2 New Source Performance Standards (NSPS) for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR Part 60, Subpart Ka][326 IAC 12]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart Ka (included as Attachment A of this permit), which are incorporated by reference as 326 IAC 12, except as otherwise specified in 40 CFR Part 60, Subpart Ka, for the one (1) vertical external floating roof storage tank, identified as 2501:

- (a) 40 CFR 60.110a(a)
- (b) 40 CFR 60.111a
- (c) 40 CFR 60.112a(a)
- (d) 40 CFR 60.113a(a)
- (e) 40 CFR 60.115a(a), (b), and (c)

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

## MINOR SOURCE OPERATING PERMIT ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Marathon Pipe Line, LLC	
Address:	3178 East State Road 32	
City:	Lebanon, Indiana 46052	
Phone #:	419-421-3385	
MSOP #:	M011-31081-00004	
I hereby certify that Mara	athon Pipe Line, LLC is:	<ul><li>□ still in operation.</li><li>□ no longer in operation.</li></ul>
I hereby certify that Mara	athon Pipe Line, LLC is:	<ul> <li>□ in compliance with the requirements of MSOP M011-31081-00004.</li> <li>□ not in compliance with the requirements of MSOP M011-31081-00004.</li> </ul>
Authorized Individual	(typed):	
Title:		
Signature:		
Date:		
If there are any condition description of how the so achieved.	ns or requirements for which the so	ource is not in compliance, provide a narrative ce and the date compliance was, or will be
Noncompliance:		

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\*SEE PAGE 2

#### **MALFUNCTION REPORT**

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH FAX NUMBER: (317) 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4. THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER?\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE?\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_, 25 TONS/YEAR VOC?\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE?\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS?\_\_\_\_, 25 TONS/YEAR FLUORIDES?\_\_\_\_, 100 TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_\_OR, PERMIT CONDITION # \_\_\_\_\_AND/OR PERMIT LIMIT OF THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE? Y THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT? Y COMPANY: PHONE NO. ( )\_\_\_\_ LOCATION: (CITY AND COUNTY)\_ AFS PLANT ID: AFS POINT ID: \_\_\_\_\_\_ INSP:\_\_\_ PERMIT NO. CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: DATE/TIME MALFUNCTION STARTED: \_\_\_\_/ \_\_\_/ 20\_\_\_\_ AM / PM ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_ DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE\_\_\_\_\_/ 20\_\_\_\_ AM/PM TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:\_\_\_\_\_ ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: MEASURES TAKEN TO MINIMIZE EMISSIONS:\_\_\_ REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS: CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: INTERIM CONTROL MEASURES: (IF APPLICABLE)\_ MALFUNCTION REPORTED BY:\_\_\_\_\_ \_\_\_\_TITLE:\_\_\_ (SIGNATURE IF FAXED) MALFUNCTION RECORDED BY: \_\_\_\_\_DATE: \_\_\_\_TIME: \_\_\_

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# Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

#### 326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

#### 326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

\*Essential services are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

## Attachment A to MSOP No. M011-31081-00004

**Title 40: Protection of Environment** 

#### PART 60—STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES

Subpart Ka— Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984

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#### **Title 40: Protection of Environment**

#### PART 60—STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES

Subpart Ka—Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984

#### § 60.110a Applicability and designation of affected facility.

- (a) Affected facility. Except as provided in paragraph (b) of this section, the affected facility to which this subpart applies is each storage vessel with a storage capacity greater than 151,416 liters (40,000 gallons) that is used to store petroleum liquids for which construction is commenced after May 18, 1978.
- (b) Each petroleum liquid storage vessel with a capacity of less than 1,589,873 liters (420,000 gallons) used for petroleum or condensate stored, processed, or treated prior to custody transfer is not an affected facility and, therefore, is exempt from the requirements of this subpart.
- (c) Alternative means of compliance —(1) Option to comply with part 65. Owners or operators may choose to comply with 40 CFR part 65, subpart C, to satisfy the requirements of §§60.112a through 60.114a for storage vessels that are subject to this subpart that store petroleum liquids that, as stored, have a maximum true vapor pressure equal to or greater than 10.3 kPa (1.5 psia). Other provisions applying to owners or operators who choose to comply with 40 CFR part 65 are provided in 40 CFR 65.1.
- (2) Part 60, subpart A. Owners or operators who choose to comply with 40 CFR part 65, subpart C, must also comply with §§60.1, 60.2, 60.5, 60.6, 60.7(a)(1) and (4), 60.14, 60.15, and 60.16 for those storage vessels. All sections and paragraphs of subpart A of this part that are not mentioned in this paragraph (c)(2) do not apply to owners or operators of storage vessels complying with 40 CFR part 65, subpart C, except that provisions required to be met prior to implementing 40 CFR part 65 still apply. Owners and operators who choose to comply with 40 CFR part 65, subpart C, must comply with 40 CFR part 65, subpart A.

[45 FR 23379, Apr. 4, 1980, as amended at 65 FR 78275, Dec. 14, 2000]

#### § 60.111a Definitions.

In addition to the terms and their definitions listed in the Act and subpart A of this part the following definitions apply in this subpart:

- (a) Storage vessel means each tank, reservoir, or container used for the storage of petroleum liquids, but does not include:
- (1) Pressure vessels which are designed to operate in excess of 204.9 kPa (15 psig) without emissions to the atmosphere except under emergency conditions.
- (2) Subsurface caverns or porous rock reservoirs, or
- (3) Underground tanks if the total volume of petroleum liquids added to and taken from a tank annually does not exceed twice the volume of the tank.
- (b) *Petroleum liquids* means petroleum, condensate, and any finished or intermediate products manufactured in a petroleum refinery but does not mean Nos. 2 through 6 fuel oils as specified in ASTM D396–78, 89, 90, 92, 96, or 98, gas turbine fuel oils Nos. 2–GT through 4–GT as specified in ASTM D2880–78 or 96, gas turbine fuel oils Nos. 2–GT through 4–GT as specified in ASTM D2880–78 or 96, or diesel fuel oils Nos. 2–D and 4–D as specified in ASTM D975–78, 96, or 98a. (These three methods are incorporated by reference—see §60.17.)

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(c) Petroleum refinery means each facility engaged in producing gasoline, kerosene, distillate fuel oils, residual fuel oils, lubricants, or other products through distillation of petroleum or through redistillation, cracking, extracting, or reforming of unfinished petroleum derivatives.

- (d) Petroleum means the crude oil removed from the earth and the oils derived from tar sands, shale, and coal.
- (e) Condensate means hydrocarbon liquid separated from natural gas which condenses due to changes in the temperature or pressure, or both, and remains liquid at standard conditions.
- (f) *True vapor pressure* means the equilibrium partial pressure exerted by a petroleum liquid such as determined in accordance with methods described in American Petroleum Institute Bulletin 2517, Evaporation Loss from External Floating-Roof Tanks, Second Edition, February 1980 (incorporated by reference—see §60.17).
- (g) Reid vapor pressure is the absolute vapor pressure of volatile crude oil and nonviscous petroleum liquids, except liquified petroleum gases, as determined by ASTM D323–82 or 94 (incorporated by reference—see §60.17).
- (h) Liquid-mounted seal means a foam or liquid-filled primary seal mounted in contact with the liquid between the tank wall and the floating roof continuously around the circumference of the tank.
- (i) Metallic shoe seal includes but is not limited to a metal sheet held vertically against the tank wall by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- (j) Vapor-mounted seal means a foam-filled primary seal mounted continuously around the circumference of the tank so there is an annular vapor space underneath the seal. The annular vapor space is bounded by the bottom of the primary seal, the tank wall, the liquid surface, and the floating roof.
- (k) Custody transfer means the transfer of produced petroleum and/or condensate, after processing and/or treating in the producing operations, from storage tanks or automatic transfer facilities to pipelines or any other forms of transportation.

[45 FR 23379, Apr. 4, 1980, as amended at 48 FR 3737, Jan. 27, 1983; 52 FR 11429, Apr. 8, 1987; 65 FR 61756, Oct. 17, 2000]

#### § 60.112a Standard for volatile organic compounds (VOC).

- (a) The owner or operator of each storage vessel to which this subpart applies which contains a petroleum liquid which, as stored, has a true vapor pressure equal to or greater than 10.3 kPa (1.5 psia) but not greater than 76.6 kPa (11.1 psia) shall equip the storage vessel with one of the following:
- (1) An external floating roof, consisting of a pontoon-type or double-deck-type cover that rests on the surface of the liquid contents and is equipped with a closure device between the tank wall and the roof edge. Except as provided in paragraph (a)(1)(ii)(D) of this section, the closure device is to consist of two seals, one above the other. The lower seal is referred to as the primary seal and the upper seal is referred to as the secondary seal. The roof is to be floating on the liquid at all times (i.e., off the roof leg supports) except during initial fill and when the tank is completely emptied and subsequently refilled. The process of emptying and refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.
- (i) The primary seal is to be either a metallic shoe seal, a liquid-mounted seal, or a vapor-mounted seal. Each seal is to meet the following requirements:
- (A) The accumulated area of gaps between the tank wall and the metallic shoe seal or the liquid-mounted seal shall not exceed 212 cm<sup>2</sup> per meter of tank diameter (10.0 in<sup>2</sup> per ft of tank diameter) and the width of any portion of any gap shall not exceed 3.81 cm (11/2in).

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(B) The accumulated area of gaps between the tank wall and the vapor-mounted seal shall not exceed 21.2 cm<sup>2</sup> per meter of tank diameter (1.0 in<sup>2</sup> per ft of tank diameter) and the width of any portion of any gap shall not exceed 1.27 cm (1/2in).

- (C) One end of the metallic shoe is to extend into the stored liquid and the other end is to extend a minimum vertical distance of 61 cm (24 in) above the stored liquid surface.
- (D) There are to be no holes, tears, or other openings in the shoe, seal fabric, or seal envelope.
- (ii) The secondary seal is to meet the following requirements:
- (A) The secondary seal is to be installed above the primary seal so that it completely covers the space between the roof edge and the tank wall except as provided in paragraph (a)(1)(ii)(B) of this section.
- (B) The accumulated area of gaps between the tank wall and the secondary seal used in combination with a metallic shoe or liquid-mounted primary seal shall not exceed 21.2 cm<sup>2</sup> per meter of tank diameter (1.0 in<sup>2</sup> per ft. of tank diameter) and the width of any portion of any gap shall not exceed 1.27 cm (1/2in.). There shall be no gaps between the tank wall and the secondary seal used in combination with a vapor-mounted primary seal.
- (C) There are to be no holes, tears or other openings in the seal or seal fabric.
- (D) The owner or operator is exempted from the requirements for secondary seals and the secondary seal gap criteria when performing gap measurements or inspections of the primary seal.
- (iii) Each opening in the roof except for automatic bleeder vents and rim space vents is to provide a projection below the liquid surface. Each opening in the roof except for automatic bleeder vents, rim space vents and leg sleeves is to be equipped with a cover, seal or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use or as described in pargraph (a)(1)(iv) of this section. Automatic bleeder vents are to be closed at all times when the roof is floating, except when the roof is being floated off or is being landed on the roof leg supports. Rim vents are to be set to open when the roof is being floated off the roof legs supports or at the manufacturer's recommended setting.
- (iv) Each emergency roof drain is to be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening.
- (2) A fixed roof with an internal floating type cover equipped with a continuous closure device between the tank wall and the cover edge. The cover is to be floating at all times, (i.e., off the leg supports) except during initial fill and when the tank is completely emptied and subsequently refilled. The process of emptying and refilling when the cover is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible. Each opening in the cover except for automatic bleeder vents and the rim space vents is to provide a projection below the liquid surface. Each opening in the cover except for automatic bleeder vents, rim space vents, stub drains and leg sleeves is to be equipped with a cover, seal, or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. Automatic bleeder vents are to be closed at all times when the cover is floating except when the cover is being floated off or is being landed on the leg supports. Rim vents are to be set to open only when the cover is being floated off the leg supports or at the manufacturer's recommended setting.
- (3) A vapor recovery system which collects all VOC vapors and gases discharged from the storage vessel, and a vapor return or disposal system which is designed to process such VOC vapors and gases so as to reduce their emission to the atmosphere by at least 95 percent by weight.
- (4) A system equivalent to those described in paragraphs (a)(1), (a)(2), or (a)(3) of this section as provided in §60.114a.
- (b) The owner or operator of each storage vessel to which this subpart applies which contains a petroleum liquid which, as stored, has a true vapor pressure greater than 76.6 kPa (11.1 psia), shall equip the storage vessel with a vapor recovery system which collects all VOC vapors and gases discharged from the storage vessel, and a vapor

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return or disposal system which is designed to process such VOC vapors and gases so as to reduce their emission to the atmosphere by at least 95 percent by weight.

[45 FR 23379, Apr. 4, 1980, as amended at 45 FR 83229, Dec. 18, 1980]

#### § 60.113a Testing and procedures.

- (a) Except as provided in §60.8(b) compliance with the standard prescribed in §60.112a shall be determined as follows or in accordance with an equivalent procedure as provided in §60.114a.
- (1) The owner or operator of each storage vessel to which this subpart applies which has an external floating roof shall meet the following requirements:
- (i) Determine the gap areas and maximum gap widths between the primary seal and the tank wall and between the secondary seal and the tank wall according to the following frequency:
- (A) For primary seals, gap measurements shall be performed within 60 days of the initial fill with petroleum liquid and at least once every five years thereafter. All primary seal inspections or gap measurements which require the removal or dislodging of the secondary seal shall be accomplished as rapidly as possible and the secondary seal shall be replaced as soon as possible.
- (B) For secondary seals, gap measurements shall be performed within 60 days of the initial fill with petroleum liquid and at least once every year thereafter.
- (C) If any storage vessel is out of service for a period of one year or more, subsequent refilling with petroleum liquid shall be considered initial fill for the purposes of paragraphs (a)(1)(i)(A) and (a)(1)(i)(B) of this section.
- (D) Keep records of each gap measurement at the plant for a period of at least 2 years following the date of measurement. Each record shall identify the vessel on which the measurement was performed and shall contain the date of the seal gap measurement, the raw data obtained in the measurement process required by paragraph (a)(1)(ii) of this section and the calculation required by paragraph (a)(1)(iii) of this section.
- (E) If either the seal gap calculated in accord with paragraph (a)(1)(iii) of this section or the measured maximum seal gap exceeds the limitations specified by §60.112a of this subpart, a report shall be furnished to the Administrator within 60 days of the date of measurements. The report shall identify the vessel and list each reason why the vessel did not meet the specifications of §60.112a. The report shall also describe the actions necessary to bring the storage vessel into compliance with the specifications of §60.112a.
- (ii) Determine gap widths in the primary and secondary seals individually by the following procedures:
- (A) Measure seal gaps, if any, at one or more floating roof levels when the roof is floating off the roof leg supports.
- (B) Measure seal gaps around the entire circumference of the tank in each place where a1/8&inch; diameter uniform probe passes freely (without forcing or binding against seal) between the seal and the tank wall and measure the circumferential distance of each such location.
- (C) The total surface area of each gap described in paragraph (a)(1)(ii)(B) of this section shall be determined by using probes of various widths to accurately measure the actual distance from the tank wall to the seal and multiplying each such width by its respective circumferential distance.
- (iii) Add the gap surface area of each gap location for the primary seal and the secondary seal individually. Divide the sum for each seal by the nominal diameter of the tank and compare each ratio to the appropriate ratio in the standard in §60.112a(a)(1)(i) and §60.112a(a)(1)(ii).
- (iv) Provide the Administrator 30 days prior notice of the gap measurement to afford the Administrator the opportunity to have an observer present.

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(2) The owner or operator of each storage vessel to which this subpart applies which has a vapor recovery and return or disposal system shall provide the following information to the Administrator on or before the date on which construction of the storage vessel commences:

- (i) Emission data, if available, for a similar vapor recovery and return or disposal system used on the same type of storage vessel, which can be used to determine the efficiency of the system. A complete description of the emission measurement method used must be included.
- (ii) The manufacturer's design specifications and estimated emission reduction capability of the system.
- (iii) The operation and maintenance plan for the system.
- (iv) Any other information which will be useful to the Administrator in evaluating the effectiveness of the system in reducing VOC emissions.

[45 FR 23379, Apr. 4, 1980, as amended at 52 FR 11429, Apr. 8, 1987]

#### § 60.114a Alternative means of emission limitation.

- (a) If, in the Administrator's judgment, an alternative means of emission limitation will achieve a reduction in emissions at least equivalent to the reduction in emissions achieved by any requirement in §60.112a, the Administrator will publish in the Federal Register a notice permitting the use of the alternative means for purposes of compliance with that requirement.
- (b) Any notice under paragraph (a) of this section will be published only after notice and an opportunity for a hearing.
- (c) Any person seeking permission under this section shall submit to the Administrator a written application including:
- (1) An actual emissions test that uses a full-sized or scale-model storage vessel that accurately collects and measures all VOC emissions from a given control device and that accurately simulates wind and accounts for other emission variables such as temperature and barometric pressure.
- (2) An engineering evaluation that the Administrator determines is an accurate method of determining equivalence.
- (d) The Administrator may condition the permission on requirements that may be necessary to ensure operation and maintenance to achieve the same emissions reduction as specified in §60.112a.
- (e) The primary vapor-mounted seal in the "Volume-Maximizing Seal" manufactured by R.F.I. Services Corporation is approved as equivalent to the vapor-mounted seal required by §60.112a(a)(1)(i) and must meet the gap criteria specified in §60.112a(a)(1)(i)(B). There shall be no gaps between the tank wall and any secondary seal used in conjunction with the primary seal in the "Volume-Maximizing Seal".

[52 FR 11429, Apr. 8, 1987]

#### § 60.115a Monitoring of operations.

- (a) Except as provided in paragraph (d) of this section, the owner or operator subject to this subpart shall maintain a record of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period.
- (b) Available data on the typical Reid vapor pressure and the maximum expected storage temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517, unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).

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(c) The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa (2.0 psia) or whose physical properties preclude determination by the recommended method is to be determined from available data and recorded if the estimated true vapor pressure is greater than 6.9 kPa (1.0 psia).

- (d) The following are exempt from the requirements of this section:
- (1) Each owner or operator of each storage vessel storing a petroleum liquid with a Reid vapor pressure of less than 6.9 kPa (1.0 psia) provided the maximum true vapor pressure does not exceed 6.9 kPa (1.0 psia).
- (2) The owner or operator of each storage vessel equipped with a vapor recovery and return or disposal system in accordance with the requirements of §60.112a(a)(3) and (b), or a closed vent system and control device meeting the specifications of 40 CFR 65.42(b)(4), (b)(5), or (c).

[45 FR 23379, Apr. 4, 1980, as amended at 65 FR 78275, Dec. 14, 2000]

#### **Indiana Department of Environmental Management**

Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit Renewal

#### Source Background and Description

Source Name: Marathon Pipe Line, LLC

Source Location: 3178 East State Road 32, Lebanon, Indiana 46052

County: Boone

SIC Code: 4612 (Crude Petroleum Pipelines)

Permit Renewal No.: M011-31081-00004
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The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Marathon Pipe Line, LLC relating to the continued operation of a stationary source for storage and pipeline distribution of crude oil. On October 28, 2011, Marathon Pipe Line, LLC submitted an application to the OAQ requesting to renew its operating permit. Marathon Pipe Line, LLC was issued is first MSOP Renewal No. M011-23917-00004 on March 5, 2007.

As part of the permit renewal application, Marathon Pipe Line, LLC, provided updated potential to emit calculations (using US EPA TANKS Version 4.09d program) for storage tanks 14, 15, 16, 17, and 18, based on the most recent and representative storage tank information. The updated calculations for each storage tank were based on the highest throughput data for years 2009, 2010, and 2011 (rounding up to 6 turnovers per year as a conservative estimate), re-evaluated maximum working volumes, detailed tank characteristics/seal/fitting information, and the storage of crude oil with a Reid vapor pressure (RVP) of 9.0 psia (annual average true vapor pressure of 5.8181 psia at varying atmospheric temperature and pressure conditions). As a result of the updated information, the potential to emit VOC and HAP for storage tanks 14, 15, 16, 17, and 18 decreased.

Note: The emission unit descriptions for the storage tanks have been revised to indicate the updated maximum working volume and updated estimated maximum annual throughput.

#### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units:

- (a) One (1) vertical external floating roof storage tank, identified as 14, installed in 1968, with an estimated maximum annual throughput of 34,370,028 gallons, maximum working volume: 5,728,338 gallons of crude oil.
- (b) One (1) vertical external floating roof storage tank, identified as 15, installed in 1968, with new primary and secondary seals installed in 2001 and an estimated maximum annual throughput of 34,324,668 gallons, maximum working volume: 5,720,778 gallons of crude oil
- (c) One (1) vertical external floating roof storage tank, identified as 16, installed in 1968, with an estimated maximum annual throughput of 34,119,792 gallons, maximum working volume: 5.686,632 gallons of crude oil.
- (d) One (1) vertical external floating roof storage tank, identified as 17, installed in 1968, with an estimated maximum annual throughput of 34,259,652 gallons, maximum working volume: 5,709,942 gallons of crude oil.

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(e) One (1) vertical external floating roof storage tank, identified as 18, installed in 1968, with new primary and secondary seals installed in 2002, with an estimated maximum annual throughput of 34,354,908 gallons, maximum working volume: 5,725,818 gallons of crude oil.

- (f) One (1) vertical external floating roof storage tank, identified as 2501, installed in 1979, with an estimated maximum annual throughput of zero (0) gallons, maximum working volume: 9,525,978 gallons of crude oil. This is an affected facility pursuant to 40 CFR 60, Subpart Ka.
- (g) Equipment leaks of VOC and HAP from flange/screwed connections, valves, pump seals, mixers, meters, strainers and/or other connectors.

#### **Existing Approvals**

The source was issued is first MSOP Renewal No. M011-23917-00004 on March 5, 2007.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

#### **Enforcement Issue**

There are no enforcement actions pending.

#### **Emission Calculations**

See Appendix A of this document for detailed emission calculations.

#### **County Attainment Status**

The source is located in Boone County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective October 19, 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	Not designated.
11 1	an attainment affective October 40, 2000 for the 4 hours are a standard which

<sup>&</sup>lt;sup>1</sup>Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.

#### (a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides ( $NO_x$ ) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and  $NO_x$  emissions are considered when evaluating the rule applicability relating to ozone. Boone County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and  $NO_x$  emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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(b)  $PM_{2.5}$ 

Boone County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011.. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants

Boone 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**

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this source contains petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels (12,600,000 gallons), it is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7. Therefore, fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

#### **Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions						
Pollutant	Tons/year					
PM	0.0					
PM <sub>10</sub>	0.0					
PM <sub>2.5</sub>	0.0					
SO <sub>2</sub>	0.0					
NO <sub>x</sub>	0.0					
VOC	50.0					
CO	0.0					
GHGs as CO₂e	0.0					

Unrestricted Potential Emissions						
Hazardous Air Pollutants (HAPs)	Tons/year					
Benzene	1.00					
Toluene	2.50					
Xylene	2.50					
Hexane	1.50					
Hydrogen Sulfide	2.00					
Total HAPs	9.50					

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(a) The potential to emit (as defined in 326 IAC 2-1.1-1) of all regulated pollutants, excluding GHGs, is less than 100 tons per year. However, VOC is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.

- (b) The potential to emit (as defined in 326 IAC 2-1.1-1) of GHGs is less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (c) The potential to emit (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-1.1-1) of a combination of HAPs is less than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.

#### **Federal Rule Applicability**

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

#### New Source Performance Standards (NSPS)

(b) The requirements of the New Source Performance Standards (NSPS) for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978, 40 CFR 60, Subpart K (60.110 through 60.113) (326 IAC 12), are not included in the permit, since the five (5) vertical external floating roof storage tanks (Tanks 14, 15, 16, 17, and 18) were installed in 1968 and the Tank 2501 was installed in 1979.

As part of this permit renewal, Marathon Pipe Line, LLC, indicated that storage Tanks 14, 15, 16, 17, and 18 were no longer storing crude oil with a Reid vapor pressure (RVP) of 5.0 psia, but were storing crude oil with a Reid vapor pressure (RVP) of 9.0 psia. This change in the material stored in each tank is not considered a modification, as defined by 40 CFR 60.14, of each storage tank, since each storage tank was designed to accommodate crude oil with a Reid vapor pressure (RVP) of 9.0 psia as an alternative storage material [40 CFR 60.14(e)(4)].

(c) Tank 2501 (installed in 1979) is subject to the requirements of the New Source Performance Standards (NSPS) for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, 40 CFR 60, Subpart Ka (60.110a through 60.115a) (326 IAC 12), since it has a storage capacity of 9,525,978 gallons, which is greater than 40,000 gallons.

Tank 2501 is subject to the following portions of 40 CFR 60, Subpart Ka:

- (1) 40 CFR 60.110a(a)
- (2) 40 CFR 60.111a
- (3) 40 CFR 60.112a(a)
- (4) 40 CFR 60.113a(a)
- (5) 40 CFR 60.115a(a), (b), and (c)

This is an existing requirement.

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(d) The requirements of the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60, Subpart Kb (60.110b through 60.117b) (326 IAC 12), are not included in the permit, since the five (5) vertical external floating roof storage tanks (Tanks 14, 15, 16, 17, and 18) were installed in 1968 (and have not been modified) and the Tank 2501 was installed in 1979.

- (e) The requirements of the following New Source Performance Standards (NSPS) are not included in the permit, because this source does not "produce" chemicals (see note 1 below) and does not consist of air oxidation unit processes, distillation operations, or reactor processes. This source only stores and transports crude oil via pipeline.
  - (1) 40 CFR 60, Subpart VV (60.480 through 60.489), Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry (326 IAC 12);
  - (2) 40 CFR 60, Subpart III (60.610 through 60.617), Standards of Performance for Volatile Organic Compound (VOC) Emissions From the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes (326 IAC 12);
  - (3) 40 CFR 60, Subpart NNN (60.660 through 60.668), Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (326 IAC 12); and
  - (4) 40 CFR 60, Subpart RRR (60.700 through 60.708), Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes (326 IAC 12).
- (f) The requirements of the New Source Performance Standard for Bulk Gasoline Terminals, 40 CFR 60, Subpart XX (326 IAC 12), are not included in the permit, because this source is not a bulk gasoline terminal (as defined by 40 CFR 60.501) that receives gasoline by pipeline, ship, or barge. This source only stores and transports crude oil via pipeline.
- (g) There are no other 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)

- (h) The requirements of the National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene, 40 CFR 61, Subpart J (61.110 through 61.112) (326 IAC 14-7) are not included in the permit, becuase the equipment associated with this source is not considered equipment that is "in benzene service", as defined by 40 CFR 61.111. The term "in benzene service" means that a piece of equipment either contains or contacts a fluid (liquid or gas) that is at least 10 percent benzene by weight as determined according to the provisions of 40 CFR 61.245(d). The equipment at this source store or convey crude oil, which do not contain 10 percent benzene by weight as determined according to the provisions of 40 CFR 61.245(d).
- (i) The requirements of the National Emission Standard for Equipment Leaks (Fugitive Emission Sources) 40 CFR 61, Subpart V (61.240 through 61.247) (326 IAC 14-8), are not included in the permit, because the equipment associated with this source is not considered equipment that is "in volatile hazardous air pollutant (VHAP) service", as defined by 40 CFR 61.241. The term "in VHAP service" means that a piece of equipment

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either contains or contacts a fluid (liquid or gas) that is at least 10 percent by weight VHAP as determined according to the provisions of 40 CFR 61.245(d). The equipment at this source store or convey crude oil, which does not contain 10 percent by weight VHAP as determined according to the provisions of 40 CFR 61.245(d).

- (j) The requirements of the National Emission Standard for Benzene Emissions From Benzene Storage Vessels, 40 CFR 61, Subpart Y (61.270 through 61.277), are not included in the permit, because each of the storage tanks at this source does not store benzene. The storage tanks at this source store crude oil.
- (k) The requirements of the National Emission Standard for Benzene Emissions From Benzene Transfer Operations 40 CFR 61, Subpart BB (61.300 through 61.306), are not included in the permit, because this source does not include benzene transfer operations. This source only stores and transports crude oil via pipeline.
- (I) The requirements of the National Emission Standard for Benzene Waste Operations 40 CFR 61, Subpart FF (61.340 through 61.359), are not included in the permit, becuase this source does not treat, store, or dispose of benzene-containing hazardous waste generated by a petroleum refinery. This source only stores and transports crude oil via pipeline.
- (m) The requirements of the following National Emission Standard for Hazardous Air Pollutants (NESHAPs) are not included in the permit, because this source is not a major source of HAPs and this source does not "manufacture" chemicals as specified in this rule (see note 1 below). This source only stores and transports crude oil via pipeline (see note 2 below).
  - (1) 40 CFR 63, Subpart F (63.100 through 63.107), NESHAPs From the Synthetic Organic Chemical Manufacturing Industry (326 IAC 20-11)
  - (2) 40 CFR 63, Subpart G (63.110 through 63.153), NESHAPs From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (326 IAC 20-11)
  - (3) 40 CFR 63, Subpart H (63.160 through 63.183), NESHAPs: Organic Hazardous Air Pollutants for Equipment Leaks (326 IAC 20-11)
  - (4) 40 CFR 63, Subpart I (63.190 through 63.193), NESHAPs: Certain Processes Subject to the Negotiated Regulation for Equipment Leaks (326 IAC 20-12)

Note 1: The major processing steps employed in Synthetic Organic Chemicals Manufacturing Industry (SOCMI) can be classified in two broad categories: conversion and separation. Conversion processes are chemical reactions that alter the molecular structure of the compounds involved. Separation operations divide mixtures into distinct fractions. [References: (1) EPA Office of Compliance Sector Notebook Project: Profile of the Organic Chemical Industry, 2nd Edition (EPA/310-R-02-001), November 2002, Section III.A.1, page 11; (2) Distillation Operations In Synthetic Organic Chemical Manufacturing - Background Information For Proposed Standards (EPA-450/3-83-005a), December 1983, Chapter 3, page 3-1; and (3) Guideline Series: Control of Volatile Organic Compound Emissions from Reactor Processes and Distillation Operations Processes in the Synthetic Organic Chemical Manufacturing Industry (EPA-450/4-91-031), August 1993, Chapter 2, page 2-1.]

Note 2: In the Hazardous Organic National Emission Standard for Hazardous Air Pollutants (NESHAP) Background Information Document (BID) Volume 2D: Comments

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on Applicability, National Impacts, and Overlap with Other Rules (EPA-453/R-94-003d), January 1994, page 3-51, the following discussion is included regarding the Hazardous Organic NESHAPs (HON) (40 CFR 63, Subpart F, G, H, I): "Processing of a chemical, as intended in the HON, involves one or more unit operations to change the physical or chemical characteristics of a raw material or an intermediate stream. Mere blending or repackaging of a finished product is not a process subject to the HON".

- (n) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations), 40 CFR 63, Subpart R (63.420 through 63.429) (326 IAC 20-10), are not included in the permit, because this source is not a bulk gasoline terminal (as defined by 40 CFR 63.421) that receives gasoline by pipeline, ship or barge. This source only stores and transports crude oil via pipeline.
- (o) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) From Oil and Natural Gas Production Facilities, 40 CFR 63, Subpart HH (63.760 through 63.779) (326 IAC 20-30), are not included in this permit, since:
  - (1) this source does not meet the definition of an oil and natural gas production facility (as defined in 40 CFR 63.761) and does not meet the specified criteria in 40 CFR 63.760(a)(2) or (a)(3). This source does not meet the specified criteria in 40 CFR 63.760(a)(2), because it does not process, upgrade, or store hydrocarbon liquids prior to the point of custody transfer (as defined by 40 CFR 63.761). This source does not meet the specified criteria in 40 CFR 63.760(a)(3), because it does not process, upgrade, or store natural gas. This source only stores and transports crude oil via pipeline, which occurs after the point of custody transfer.

Under 40 CFR 63.761, "facility" means any grouping of equipment where hydrocarbon liquids are processed, upgraded (i.e., remove impurities or other constituents to meet contract specifications), or stored <u>prior to the point of custody transfer</u>.

Under 40 CFR 63.761, "custody transfer" means the transfer of hydrocarbon liquids or natural gas: after processing and/or treatment in the producing operations, or <u>from storage vessels or automatic transfer facilities or other such equipment, including product loading racks, to pipelines or any other forms of transportation.</u>

EPA has previously indicated that pipelines that handle hydrocarbon liquids after the point of custody transfer are not within the scope of the oil and natural gas production source category, but are within the organic liquids distribution (nongasoline) source category. (see Federal Register 63 FR 6291, February 6, 1998, for the National Emission Standards for Hazardous Air Pollutants: Oil and Natural Gas Production and Natural Gas Transmission and Storage - Proposed Rule and the background information document entitled "National Emission Standards for Hazardous Air Pollutants for Source Categories: Oil and Natural Gas Production and Natural Gas Transmission and Storage - Background Information for Final Standards: Summary of Public Comments and Responses ,EPA-453/R-99-004b, May 1999).

(2) pursuant to 40 CFR 63.760(e)(1), a facility that exclusively processes, stores, or transfers black oil (as defined in 40 CFR 63.761) is not subject to the requirements of 40 CFR Subpart HH. Under 40 CFR 63.761, "black oil" means hydrocarbon (petroleum) liquid with an initial producing gas-to-oil ratio (GOR)

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less than 0.31 cubic meters per liter and an API gravity less than 40 degrees. Based on the background information document entitled "National Emissions Standards for Hazardous Air Pollutants for Source Categories: Oil and Natural Gas Production and Natural Gas Transmission and Storage - Background Information for Proposed Standards (EPA-453/R-94-079a, April 1997), "black oil" refers to crude oil that has little, if any, associated gas production.

- (p) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) From Natural Gas Transmission and Storage Facilities, 40 CFR 63, Subpart HHH (63.1270 through 63.1289) (326 IAC 20-31), are not included in this permit, because this source is not a natural gas transmission and storage facility (as defined by 40 CFR 63.1271). This source only stores and transports crude oil via pipeline.
- (q) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Organic Liquids Distribution (Non-Gasoline), 40 CFR 63, Subpart EEEE (63.2330 through 63.2406) (326 IAC 20-83) are not included in the permit for the organic liquids distribution (as defined by 40 CFR 63.2406) operations at this source, because this source is not a major source of HAPs.
- (r) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities, 40 CFR 63, Subpart BBBBB (63.11080 through 63.11100), are not included in the permit, because the source is not considered a bulk gasoline terminal, a pipeline breakout station, a pipeline pumping station, or a bulk gasoline plant as defined in 40 CFR 63.11081. This source only stores and transports crude oil via pipeline.
- (s) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Dispensing Facilities, 40 CFR 63, Subpart CCCCCC (63.11110 through 63.11132), are not included in the permit, because this source does not include a gasoline dispensing facility as defined by 40 CFR 63.11132. This source only stores and transports crude oil via pipeline.
- (t) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

#### State Rule Applicability - Entire Source

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

The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

#### 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:

Marathon Pipe Line, LLC Page 9 of 11
Lebanon, Indiana TSD for M011-31081-00004

Permit Reviewer: Nathan C. Bell

(1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(2) 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.

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

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

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

The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

#### 326 IAC 6.5 (PM Limitations Except Lake County)

This source is not subject to 326 IAC 6.5 because it is not located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne County and it does not have the potential to emit particulate matter is equal to or greater than 10 tons per year.

#### 326 IAC 6.8 (PM Limitations for Lake County)

This source is not subject to 326 IAC 6.8 because it is not located in Lake County and it does not have the potential to emit particulate matter is equal to or greater than 10 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

#### State Rule Applicability - Individual Facilities

#### Storage Tanks

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

Each of the storage tanks is not subject to the requirements of 326 IAC 8-1-6, since they each were constructed before January 1, 1980, and they each have unlimited VOC potential emissions of less than twenty-five (25) tons per year.

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

Pursuant to 326 IAC 8-4-1(c), each of the storage vessels at this source is not subject to the requirements of 326 IAC 8-4-3, since:

- (a) Tanks 14, 16, 17 were each installed in 1968 and Tank 2501 was installed in 1979, before the applicability date of January 1, 1980; and
- (b) Tanks 15 and 18 were each installed in 1968, before the applicability date of January 1, 1980.

Note: Even though a new primary and secondary seal were installed in 2001 on Tank 15 and in 2002 on Tank 18, these changes were not considered modifications because the potential to emit did not increase. In addition, the addition of the new seals was not

Marathon Pipe Line, LLC Page 10 of 11
Lebanon, Indiana TSD for M011-31081-00004

Permit Reviewer: Nathan C. Bell

considered a reconstruction (as defined in 326 IAC 1-2-65) of the Tank 15 or Tank 18, because the installation cost was less than fifty percent (50.0%) of the replacement cost of a new tank. This determination was made in the Technical Support Document (TSD) for MSOP No. 011-14846-00004, issued on February 21, 2002.

326 IAC 8-4-4 (Petroleum Sources: Bulk Gasoline Terminals)

This source is not subject to the requirements 326 IAC 8-4-4, because this source is not a bulk gasoline terminal. This source only stores and transports crude oil via pipeline.

326 IAC 8-4-6 (Petroleum Sources: Gasoline Dispensing Facilities)

This source is not subject to the requirements 326 IAC 8-4-6, because this source will not operate a gasoline dispensing facility. This source only stores and transports crude oil via pipeline.

326 IAC 8-6 (VOC Rules: Organic Solvent Emission Limitations)

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

- (a) Tanks 14, 15, 16, 17, and 18 were each installed in 1968, before October 7, 1974; and
- (b) Tank 2501, which was installed in 1979, has potential VOC emissions of less than 100 tons per year.
- 326 IAC 8-7 (VOC Rules; Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

Pursuant to 326 IAC 8-7-2(a), this source is not subject to the requirements of 326 IAC 8-7, since it is not located in Lake, Porter, Clark, or Floyd County.

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

Pursuant to 326 IAC 8-9-1(a), this source is not subject to the requirements of 326 IAC 8-9, since it is not located in Lake, Porter, Clark, or Floyd County.

There are no other 326 IAC 8 Rules that are applicable to the storage tanks at this source.

#### **Compliance Determination and Monitoring Requirements**

(a) The compliance monitoring requirements applicable to this source are as follows:

Pursuant to 40 CFR 60.115a(a), the owner or operator subject to 40 CFR 60, Subpart Ka, shall maintain a record of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period.

These monitoring conditions are necessary to ensure compliance with the requirements under 40 CFR 60.115a(a) of the New Source Performance Standards (NSPS) for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, 40 CFR 60, Subpart Ka.

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Lebanon, Indiana Permit Reviewer: Nathan C. Bell

Marathon Pipe Line, LLC

(b) The testing requirements applicable to this source are as follows:

Testing Requirements							
Unit	Parameter/Measurement	Testing Timeframe and Frequency					
Tank 2501	gap areas and maximum gap widths between the primary seal and the tank wall and between the secondary seal and the tank wall	For primary seals, gap measurements shall be performed within 60 days of the initial fill with petroleum liquid and at least once every five years thereafter.  For secondary seals, gap measurements shall be performed within 60 days of the initial fill with petroleum liquid and at least once every year thereafter.					

The testing requirements are necessary to ensure compliance with the standards under 40 CFR 60.112a of the New Source Performance Standards (NSPS) for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, 40 CFR 60, Subpart Ka.

Note: 40 CFR 60, Subpart Ka, is included as Attachment A to the permit.

#### Recommendation

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

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

The MSOP Renewal application No. 011-31081-00004 was received on October 28, 2011.

#### Conclusion

The operation of this stationary source for storage and pipeline distribution of crude oil shall be subject to the conditions of the attached MSOP Renewal No. M011-31081-00004.

#### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Nathan Bell 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) 233-5670 or toll free at 1-800-451-6027 extension 35670.
- A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/ (b)
- For additional information about air permits and how the public and interested parties can (c) participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

#### TSD Appendix A: Emission Calculations Emissions Summary

Company Name: Marathon Pipe Line, LLC

Source Address: 3178 East State Road 32, Lebanon, Indiana 46052

Permit Number: M011-31081-00004 Reviewer: Nathan C. Bell

Uncontrolled Potential to Emit (PTE) (tons/year)														
	GHGs as Hydrogen   Total											Total		
Emission Unit/Activity	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	Benzene	Toluene	Xylene	Hexane	Sulfide	HAPs
Tank 14	0.0	0.0	0.0	0.0	0.0	1.20	0.0	0.0	0.024	0.060	0.060	0.036	0.048	0.23
Tank 15	0.0	0.0	0.0	0.0	0.0	1.21	0.0	0.0	0.024	0.060	0.060	0.036	0.048	0.23
Tank 16	0.0	0.0	0.0	0.0	0.0	1.20	0.0	0.0	0.024	0.060	0.060	0.036	0.048	0.23
Tank 17	0.0	0.0	0.0	0.0	0.0	1.21	0.0	0.0	0.024	0.060	0.060	0.036	0.048	0.23
Tank 18	0.0	0.0	0.0	0.0	0.0	2.34	0.0	0.0	0.047	0.117	0.117	0.070	0.093	0.44
Tank 2501	0.0	0.0	0.0	0.0	0.0	38.4	0.0	0.0	0.77	1.92	1.92	1.15	1.54	7.30
Equipment Leaks (fugitive)	0.0	0.0	0.0	0.0	0.0	4.45	0.0	0.0	0.089	0.22	0.22	0.13	0.18	0.85
Totals	0.0	0.0	0.0	0.0	0.0	50.00	0.0	0.0	1.00	2.50	2.50	1.50	2.00	9.50

<sup>\*</sup>Note the above table is based on the estimated maximum throughputs of all the tanks currently in operation at the source. Tank 2501 is currently clean/empty, but the source would like to keep it in the permit. The maximum PTE VOC from Tank 2501 was estimated by subtracting the PTE of the other tanks and the fugitive VOC emissions from equipment leaks from the sourcewide PTE of VOC of 50.0 tons per year.

#### TSD Appendix A: Emission Calculations Fugitive Equipment Leaks Oil and Gas Production Operations

Company Name: Marathon Pipe Line, LLC

Source Address: 3178 East State Road 32, Lebanon, Indiana 46052

Permit Number: M011-31081-00004 Reviewer: Nathan C. Bell

#### Potential to Emit (PTE) of Volatile Organic Compounds (VOC)

Based on AP-42 Fifth Edition, Volume I, Chapter 5, fugitive emissions from equipment leaks were estimated using average emission factors from "Protocol for Equipment Leak Emission Estimates", EPA-453/R-95-017 (November 1995).

			Emission	Emission	Uncontrolled	Uncontrolled
		Number of	Factor	Factor	PTE of VOC	PTE of VOC
Component Type	Service	Units	(kg/hr/unit)*	(lb/hr/unit)	(lbs/hour)	(tons/year)
Flange/screwed Connections	Light Oil	283	0.00011	0.00024	0.069	0.301
Valves	Light Oil	103	0.0025	0.0055	0.568	2.49
Pump Seals	Light Oil	4.00	0.0130	0.0287	0.115	0.502
Mixers	Light Oil	6.00	0.0075	0.0165	0.099	0.435
Meters	Light Oil	5.00	0.0075	0.0165	0.083	0.362
Strainers	Light Oil	5.00	0.0075	0.0165	0.083	0.362
•				Totals	1.02	4.45

#### Potential to Emit (PTE) of Hazardous Air Pollutants (HAPs)

			HAP	Content (% by	weight)**			Uncon	trolled PTE	of HAPs (tor	ns/year)	
						Hydrogen					Hydrogen	Total
Component Type	Sevice	Benzene	Toluene	Xylene	Hexane	Sulfide	Benzene	Toluene	Xylene	Hexane	Sulfide	HAPs
Flange/screwed Connections	Light Oil	2.0%	5.0%	5.0%	3.0%	4.0%	0.006	0.015	0.015	0.009	0.012	0.057
Valves	Light Oil	2.0%	5.0%	5.0%	3.0%	4.0%	0.050	0.124	0.124	0.075	0.099	0.472
Pump Seals	Light Oil	2.0%	5.0%	5.0%	3.0%	4.0%	0.010	0.025	0.025	0.015	0.020	0.095
Mixers	Light Oil	2.0%	5.0%	5.0%	3.0%	4.0%	0.009	0.022	0.022	0.013	0.017	0.083
Meters	Light Oil	2.0%	5.0%	5.0%	3.0%	4.0%	0.007	0.018	0.018	0.011	0.014	0.069
Strainers	Light Oil	2.0%	5.0%	5.0%	3.0%	4.0%	0.007	0.018	0.018	0.011	0.014	0.069
						Totals	0.089	0.222	0.222	0.133	0 178	0.845

#### Methodology

\*Emission factors taken from Protocol for Equipment Leak Emission Estimates, EPA-453/R-95-017 (November 1995), Table 2-4.

\*\*HAP Content (% by weight) are taken from an MSDS provided by the source.

Emission Factor (lb/hr/unit) = [Emission Factor (kg/hr/unit)] \* [2.20462 lb/kg]

Uncontrolled PTE of VOC (tons/year)) = [Number of Units] \* [Emission Factor (lb/hr/unit)] \* [VOC Content (% by weight)] \* [8760 hr/yr] \* [ton/2000 lb] Uncontrolled PTE of HAPs (tons/year)) = [Number of Units] \* [Emission Factor (lb/hr/unit)] \* [HAP Content (% by weight)] \* [8760 hr/yr] \* [ton/2000 lb]

### TSD Appendix A: Emission Calculations Tanks VOC Emissions

Company Name: Marathon Pipe Line, LLC

Source Address: 3178 East State Road 32, Lebanon, Indiana 46052

Permit Number: M011-31081-00004 Reviewer: Nathan C. Bell

#### Potential to Emit (PTE) of Volatile Organic Compounds (VOC)

To calculate the PTE of VOC from storage tanks, US EPA TANKS Version 4.09d program was utilized.

Storage	Draduat Stared	Tonk Tune	Doof Tune	Tank	Maximum Working Volume	Turnovers	Product Throughput
Tank ID	Product Stored	Tank Type	Roof Type	Dimensions	(gallons)	per year	(gallons/yr)
14	Crude Oil (RVP 5)	Vertical	External Floating	150 ft dia 48 ft height	5,728,338	6.000	34,370,028
15	Crude Oil (RVP 5)	Vertical	External Floating	150 ft dia 48 ft height	5,720,778	6.000	34,324,668
16	Crude Oil (RVP 5)	Vertical	External Floating	150 ft dia 48 ft height	5,686,632	6.000	34,119,792
17	Crude Oil (RVP 5)	Vertical	External Floating	150 ft dia 48 ft height	5,709,942	6.000	34,259,652
18	Crude Oil (RVP 5)	Vertical	External Floating	150 ft dia 48 ft height	5,725,818	6.000	34,354,908
2501*	Crude Oil (RVP 5)	Vertical	External Floating	200 ft dia 42 ft height	9 525 978 see note*		see note*

Tank		Total VOC Losses (lbs/yr)				Total VOC Losses	Total VOC Losses	
Number	Product Stored	Rim Seal	Withdrawl	Deck Fitting	Deck Seam	(lbs/yr)	(tons/yr)	
14	Crude Oil (RVP 5)	1722.86	240.77	433.14	0.00	2396.77	1.20	
15	Crude Oil (RVP 5)	1722.86	240.45	450.85	0.00	2414.16	1.21	
16	Crude Oil (RVP 5)	1722.86	239.01	433.14	0.00	2395.01	1.20	
17	Crude Oil (RVP 5)	1722.86	239.99	450.85	0.00	2413.70	1.21	
18	Crude Oil (RVP 5)	1722.86	240.66	2709.53	0.00	4673.05	2.34	
2501	Crude Oil (RVP 5)	-	-	-	=	76820.0	38.41	
	•		•		Totals	91112.7	45.6	

#### Methodology

\*Based on information provided for MSOP Renewal 011-23917-00004, issued on March 5, 2007, Tank 2501 has been clean/empty and has had zero throughput since the issuance of MSOP 011-14846-00004. However, the source would still like to keep the tank in the permit in anticipation of future use. As a worst case scenario and to determine permit level, it is assumed that Tank 2501 is in operaiton with a potential to emit VOC of 38.41 tons per year. This number is obtained by subtracting the remaining PTE VOC at the source (remaining tanks + fugitive emissions) from the source's estimated maximum potential to emit VOC of 50.0 tons per year.

[Turnovers per year] = Product Throughput (gallons/yr) / [Maximum Liquid Volume (gallons)]

All storage tanks emissions are estimated using USEPA's TANKs 4.09d software program and are based on the estimated maximum annual throughput for each tank.

## TSD Appendix A: Emission Calculations Tanks HAP Emissions

Company Name: Marathon Pipe Line, LLC

Source Address: 3178 East State Road 32, Lebanon, Indiana 46052

Permit Number: M011-31081-00004 Reviewer: Nathan C. Bell

#### Potential to Emit (PTE) of Hazardous Air Pollutants (HAPs)

				HAP Co	ntent (% by	weight)*			Unconf	rolled PTE	of HAPs (tor	ns/year)	
		Total VOC											
Tank		Losses					Hydrogen					Hydrogen	Total
Number	Product Stored	(tons/yr)	Benzene	Toluene	Xylene	Hexane	Sulfide	Benzene	Toluene	Xylene	Hexane	Sulfide	HAPs
14	Crude Oil (RVP 5)	1.20	2.0%	5.0%	5.0%	3.0%	4.0%	0.024	0.060	0.060	0.036	0.048	0.228
15	Crude Oil (RVP 5)	1.21	2.0%	5.0%	5.0%	3.0%	4.0%	0.024	0.060	0.060	0.036	0.048	0.229
16	Crude Oil (RVP 5)	1.20	2.0%	5.0%	5.0%	3.0%	4.0%	0.024	0.060	0.060	0.036	0.048	0.228
17	Crude Oil (RVP 5)	1.21	2.0%	5.0%	5.0%	3.0%	4.0%	0.024	0.060	0.060	0.036	0.048	0.229
18	Crude Oil (RVP 5)	2.34	2.0%	5.0%	5.0%	3.0%	4.0%	0.047	0.117	0.117	0.070	0.093	0.444
2501	Crude Oil (RVP 5)	38.41	2.0%	5.0%	5.0%	3.0%	4.0%	0.768	1.92	1.92	1.15	1.54	7.30
<u> </u>			•		•	•	Totals	0.911	2.28	2.28	1.37	1.82	8.66

#### Methodology

\*HAP Content (% by weight) are taken from an MSDS provided by the source.

Uncontrolled PTE of HAPs (tons/year)) = [Total VOC Losses (tons/yr)] \* [HAP Content (% by weight)]





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

January 11, 2012

Mr. Gary Wilson Marathon Pipe Line, LLC 539 S Main Street Findlay, OH 45840

Re: Public Notice

Marathon Pipe Line, LLC Permit Level: MSOP Renewal Permit Number: 011-31081-00004

Dear Mr. Wilson:

Enclosed is a copy of your draft MSOP Renewal, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has submitted the draft permit package to the Lebanon Public Library, 104 East Washington Street in Lebanon, Indiana, As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the Lebanon Reporter in Lebanon, Indiana publish this notice no later than January 11, 2012.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Nathan Bell, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-5670 or dial (317) 233-5670.

Sincerely,

Permits Branch Office of Air Quality

**Enclosures** 

PN Applicant Cover letter. dot 3/27/08



#### 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

#### **Notice of Public Comment**

**January 11, 2012** Marathon Pipe Line, LLC 011-31081-00004

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.

> Enclosure PN AAA Cover.dot 3/27/08







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

January 11, 2012

To: Lebanon Public Library

From: Matthew Stuckey, Branch Chief

> Permits Branch Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air

Permit

Marathon Pipe Line, LLC Applicant Name:

Permit Number: 011-31081-00004

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- **Draft Permit and Technical Support Document**

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

> **Enclosures** PN Library.dot 03/27/08



## Mail Code 61-53

IDEM Staff	GHOTOPP 1/11	/2012		
	Marathon Pipe Li	ine, LLC 011-31081-00004 Draft	AFFIX STAMP	
Name and		Indiana Department of Environmental	Type of Mail:	HERE IF
address of		Management		USED AS
Sender		Office of Air Quality – Permits Branch	CERTIFICATE OF	CERTIFICATE
		100 N. Senate	MAILING ONLY	OF MAILING
		Indianapolis, IN 46204	IIII VIEINO ONET	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Gary Wilson Marathon Pipe Line, LLC 539 S Main St Findlay OH 45840 (Source CAA)	TS)		•						
2		Craig Pierson President Marathon Pipe Line, LLC 539 S Main St Findlay OH 45840 (RO CAATS)									
3		Boone County Commisioners Courthouse Square Lebanon IN 46052 (Local Official)									
4		Boone County Health Department 116 W Washington St. #B202 Lebanon IN 46052-2174 (Health Department)									
5		Daryl & Lois Hoffman 7750 N. CR 75 E Lizton IN 46149 (Affected Party)									
6		Lebanon Public Library 104 E Washington St Lebanon IN 46052-2298 (Library)									
7		Lebanon City Council and Mayors Office 201 E. Main St. Lebanon IN 46052 (Local	Official)								
8											
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12											
13											
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express
_			Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50,000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal
/			insurance. See <b>Domestic Mail Manual R900</b> , <b>S913</b> , and <b>S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.