



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

Michael R. Pence  
Governor

Thomas W. Easterly  
Commissioner

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

Preliminary Findings Regarding a  
Significant Revision to a  
Federally Enforceable State Operating Permit (FESOP)

for Enterprise Terminals & Storage, LLC in Jackson County

Significant Permit Revision No.: 071-35950-00007

The Indiana Department of Environmental Management (IDEM) has received an application from Enterprise Terminals & Storage, LLC, located at 10197 E County Road 1000 N, Seymour, Indiana 47274, for a significant revision of its FESOP issued on November 5, 2014. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Enterprise Terminals & Storage, LLC to make certain changes at its existing source. Enterprise Terminals & Storage, LLC has applied to switching underground storage Cavern 2 from isobutane to propane service.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). The potential to emit of any regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

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

Jackson County Public Library  
303 W Second Street  
Seymour, IN 47274

and

IDEM Southeast Regional Office  
820 West Sweet Street  
Brownstown, IN 47220-9557

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 SPR 071-35950-00007 in all correspondence.

**Comments should be sent to:**

Julie Alexander  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 3-1782  
Or dial directly: (317) 233-1782  
Fax: (317) 232-6749 attn: Julie Alexander  
E-mail: JuAlexan@idem.IN.gov

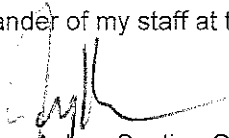
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**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, at the IDEM Regional Office 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 Julie Alexander or my staff at the above address.



Jenny Acker, Section Chief  
Permits Branch  
Office of Air Quality



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**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

Shiver Nolan  
Enterprise Terminals & Storage, LLC  
PO Box 43247  
Houston, TX 77210

## DRAFT

Re: 071-35950-00007  
Significant Revision to  
F071-34698-00007

Dear Shiver Nolan:

Enterprise Terminals & Storage, LLC was issued a Federally Enforceable State Operating Permit (FESOP) No. F071-34698-00007 on November 5, 2014 for a stationary refined petroleum pipeline terminal located at 10197 E County Road 1000 N, Seymour, Indiana 47274. On June 15, 2015, the Office of Air Quality (OAQ) received an application from the source requesting to switching underground storage Cavern 2 from isobutane to propane service. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source and permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions  
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised. The permit references the below listed attachments. Since these attachments

## DRAFT

have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this revision:

Attachment A: NSPS Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984

Attachment B: NESHAP Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: [http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl).

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Julie Alexander of my staff at 317-233-1782 or 1-800-451-6027, and ask for extension 3-1782.

Sincerely,

Jenny Acker, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Technical Support Document and revised permit

JA/jla

cc: File - Jackson County  
Jackson County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch



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### New Source Construction and Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Enterprise Terminals & Storage, LLC  
10197 E County Road 1000 N  
Seymour, Indiana 47274**

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

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

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

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

Operation Permit No.: F071-34698-00007	
Issued by:  Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 5, 2014  Expiration Date: November 5, 2019

Significant Permit Revision No.: 071-35950-00007	
Issued by:  Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date: November 5, 2019

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**Attachment A: NSPS Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984**

**Attachment B: NESHAP Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

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**SECTION A**

**SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.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 2-8-3(b)]**

---

The Permittee owns and operates a stationary refined petroleum pipeline terminal.

Source Address:	10197 E. County Road 1000 North, Seymour, Indiana 47274
General Source Phone Number:	(713) 803-5407
SIC Code:	4613
County Location:	Jackson
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

---

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

- (a) One (1) fixed roof cone tank identified as Tank No. 3001, with a capacity of 3,534,659 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Jet A Kerosene, Diesel and similar low vapor pressure (VP) product, and exhausting to stack 001 (constructed in 1959).
- (b) One (1) fixed roof cone tank identified as Tank No. 3002, with a capacity of 2,666,143 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Jet A Kerosene, Diesel and similar low VP product, exhausting to stack 002 (constructed in 1959).
- (c) One (1) fixed roof cone tank identified as Tank No. 3003, with a capacity of 2,666,143 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Jet A Kerosene, Diesel and similar low VP product, exhausting to stack 003 (constructed in 1959).
- (d) One (1) internal floating roof tank identified as Tank No. 3004, with a capacity of 3,220,014 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Natural Gasoline, Gasoline and petroleum products, Jet A Kerosene, Diesel and similar low VP product, and exhausting to stack 004 (constructed in 1959).
- (e) One (1) domed external floating roof tank identified as Tank No. 3005, with a capacity of 3,249,498 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Natural Gasoline, Gasoline and petroleum products, Jet A Kerosene, Diesel and similar low VP product, and exhausting to stack 005 (constructed in 1959).
- (f) One (1) domed external floating roof tank identified as Tank No. 3006, with a capacity of 3,246,054 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Natural Gasoline, Gasoline and petroleum products, Jet A Kerosene, Diesel and similar low VP product, and exhausting to stack 006 (constructed in 1959).



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- (g) One (1) domed external floating roof tank identified as Tank No. 3007, with a capacity of 2,527,686 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Natural Gasoline, Gasoline and petroleum products, Jet A Kerosene, Diesel and similar low VP product, and exhausting to stack 007) (constructed in 1959).
- (h) One (1) domed external floating roof tank identified as Tank No. 3008, with a capacity of 2,528,274 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Natural Gasoline, Gasoline and petroleum products, Jet A Kerosene, Diesel and similar low VP product, and exhausting to stack 008 (constructed in 1959).
- (i) One (1) internal floating roof tank identified as Tank No. 3009, with a capacity of 12,453,714 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Natural Gasoline, Gasoline and petroleum products, Jet A Kerosene, Diesel and similar low VP product, and exhausting to stack 009 (constructed in 1961).
- (j) One (1) fixed roof cone tank identified as Tank No. 3010, with a capacity of 13,309,385 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Jet A Kerosene, Diesel and similar low VP product and exhausting to stack 010 (constructed in 1961).
- (k) One (1) fixed roof cone tank identified as Tank No. 3011, with a capacity of 3,566,099 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Jet A Kerosene, Diesel and similar low VP product and exhausting to stack 011 (constructed in 1961).
- (l) One (1) domed external floating roof tank identified as Tank No. 3012, with a capacity of 1,361,892 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Natural Gasoline, Gasoline and petroleum products, Jet A Kerosene, Diesel and similar low VP product, and exhausting to stack 012 (constructed in 1961).
- (m) One (1) fixed roof cone tank identified as Tank No. 3013, with a capacity of 11,022,995 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Jet A Kerosene, Diesel and similar low VP product and exhausting to stack 013 (constructed in 1961).
- (n) One (1) domed external floating roof tank identified as Tank No. 3014, with a capacity of 2,498,790 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Natural Gasoline, Gasoline and petroleum products, Jet A Kerosene, Diesel and similar low VP product, and exhausting to stack 014 (constructed in 1960).
- (o) One (1) domed external floating roof tank identified as Tank No. 3015, with a capacity of 3,245,424 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Natural Gasoline, Gasoline and petroleum products, Jet A Kerosene, Diesel and similar low VP product, and exhausting to stack 015 (constructed in 1960).
- (p) One (1) domed external floating roof tank identified as Tank No. 3016, with a capacity of 3,497,718 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Natural Gasoline, Gasoline and petroleum products, Jet A Kerosene, Diesel and similar low VP product, and exhausting to stack 016 (constructed in 1960).
- (q) One (1) domed external floating roof tank identified as Tank No. 3017, with a capacity of 2,498,118 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Natural Gasoline, Gasoline and petroleum products, Jet A Kerosene, Diesel and similar low VP product and exhausting to stack 017 (constructed in 1960).
- (r) One (1) internal floating roof tank identified as Tank No. 3018, with a capacity of 955,988 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Natural Gasoline, Gasoline and petroleum products, Jet A Kerosene, Diesel and similar low VP product, and exhausting to stack 018 (constructed in 1980).

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- (s) One (1) internal floating roof tank identified as Tank No. 3061, with a capacity of 79,716 gallons and a maximum withdrawal rate of 2,000 barrels per hour of Natural Gasoline, Gasoline and petroleum products, Jet A Kerosene, Diesel and similar low VP product, and exhausting to stack 061 (constructed in 1959).
- (t) One (1) fixed roof cone tank identified as Tank No. 3062, with a capacity of 211,012 gallons and a maximum withdrawal rate of 5,000 barrels per hour of Blends, Transmix, Jet A Kerosene, Diesel and similar low VP product and exhausting to stack 062 (constructed in 1961).
- (u) One (1) internal floating roof tank identified as Tank No. 3063, with a capacity of 201,516 gallons and a maximum withdrawal rate of 5,000 barrels per hour of Natural Gasoline, Gasoline and petroleum products, Jet A Kerosene, Diesel and similar low VP product, and exhausting to stack 063 (constructed in 1961).

Note: All annual tank throughputs (except tanks 3010, 3011 and 3062) are based on 73 turnovers. The annual tank throughputs of Tanks 3010 and 3011 are based on 100 turnovers, and Tank 3062 is based on 12 turnovers.

- (v) One (1) underground propane storage cavern, identified as Cavern 3, constructed in 2001, approved in 2014 for modification, with a maximum storage capacity of 500,000 barrels, using a flare as control, equipped with a 0.1 MMbtu/hr natural gas or propane fired pilot light.
- (w) One (1) underground propane storage cavern, identified as Cavern 2, constructed in 1976, approved in 2015 for modification, with a maximum storage capacity of 408,000 barrels, using a flare as control, equipped with a 0.1 MMbtu/hr natural gas or propane fired pilot light.

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

This stationary source also includes the following regulated insignificant activities:

- (a) Space heaters, process heaters, or boilers using the following fuels: Propane or liquified petroleum gas, or butane -fired combustion sources with heat input equal to or less than six million (7,800,000) Btu per hour.
- (b) One (1) compression ignition emergency generator manufactured in January of 2006 and installed in February of 2006, rated at two hundred twenty-four (224) horsepower. [40 CFR 63, Subpart ZZZZ]

#### A.4 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) A petroleum fuel, other than gasoline, dispensing facility, having storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (b) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
  - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

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- (c) Equipment used exclusively for the following: filling drums, pails or other packaging containers with lubricating oil, waxes, and greases.
- (d) Groundwater oil recovery wells.
- (e) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (f) Process vessel degreasing and cleaning to prepare for internal repairs.
- (g) On-site fire and emergency response training approved by the department.
- (h) Purge double block and bleed valves.
- (i) Farm operations.
- (j) Activities or categories not previously identified with emissions less than exempt thresholds:
  - (1) Tank bottom treatment system, consisting of a primary gravity oil/water separator, a sand/carbon filter unit, a 100,000 gallon influent equalization tank, a secondary gravity oil/water separator, an activated sludge biological system and two 100,000 gallon effluent holding tanks.

**A.5 FESOP Applicability [326 IAC 2-8-2]**

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

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**SECTION B**

**GENERAL CONDITIONS**

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

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

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

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- (a) This permit, F071-34698-00007, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

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

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

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

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

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

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

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(a) If required by specific condition(s) in Section D of this permit, 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:

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

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly

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signed, contemporaneous operating logs or other relevant evidence that describe the following:

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

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

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

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

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- (a) All terms and conditions of permits established prior to F071-34698-00007 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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



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**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
**[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
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 nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

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document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

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

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

**B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

**B.19 Source Modification Requirement [326 IAC 2-8-11.1]**

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

**B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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

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

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- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

**B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]**

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

**B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]**

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

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

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

- (a) Opacity shall not exceed an average of forty percent (40%) 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,

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Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

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

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

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

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

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

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

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

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

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

**C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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



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**C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

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- (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.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
- (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

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

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- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.17 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

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**SECTION D.1**

**EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

- (r) One (1) internal floating roof tank identified as Tank No. 3018, with a capacity of 955,988 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Natural Gasoline, Gasoline and petroleum products, Jet A Kerosene, Diesel and similar low VP product, and exhausting to stack 018 (constructed in 1980).
- (v) One (1) underground propane storage cavern, identified as Cavern 3, constructed in 2001, approved in 2014 for modification, with a maximum storage capacity of 500,000 barrels, using a flare as control, equipped with a 0.1 MMbtu/hr natural gas or propane fired pilot light.
- (w) One (1) underground propane storage cavern, identified as Cavern 2, constructed in 1976, approved in 2015 for modification, with a maximum storage capacity of 408,000 barrels, using a flare as control, equipped with a 0.1 MMbtu/hr natural gas or propane fired pilot light.

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

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

**D.1.1 FESOP and Prevention of Significant Deterioration (PSD) Minor Limits [326 IAC 2-8-4] [326 IAC 2-2]**

Pursuant to 326 IAC 2-8-4 (FESOP), the combined VOC emission from the underground caverns, identified as Cavern 2 and Cavern 3, shall not exceed 32.00 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit of VOC from all other units at the source, shall limit the potential to emit of VOC from the entire source to less than 100 tons per twelve (12) consecutive month and shall render the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

**D.1.2 New Facilities, General Reduction Requirements [326 IAC 8-1-6]**

Pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), the Permittee shall control the VOC emissions from the underground cavern (Cavern 3) which has been determined to be the following:

- (a) The VOC emissions from Cavern 3 shall not exceed 20.66 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The overall VOC efficiency (including the capture efficiency and destruction efficiency) of the flare for Cavern 3 shall be equal to or greater than 98%.
- (c) The Permittee shall use the flare to control the emissions from Cavern 3 when venting operations occur at this unit.
- (d) The Permittee shall insure that the flare pilot light shall only burn natural gas and propane.

**D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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## Compliance Determination Requirements

### D.1.4 VOC Control

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- (a) In order to ensure compliance with Condition D.1.1 and D.1.2, the flare for VOC control shall be in operation and control emissions from Cavern 2 and Cavern 3 at all times when venting operations occur at Cavern 2 or Cavern 3.

- (b) Compliance with the VOC emission limitations in Condition D.1.1 shall be determined as follows:

$$\text{VOC (tons/month)} = \{[V_2 \times \text{VOC\%} / 2000 \text{ tons/lb}] \times (1-\text{CE\%})\} + \{[V_3 \times \text{VOC\%} / 2000 \text{ tons/lb}] \times (1-\text{CE\%})\}$$

Where:

$V_2$  = Volume propane vented from Cavern 2 (lbs/month)

$V_3$  = Volume propane vented from Cavern 3 (lbs/month)

VOC% = VOC weight percent of ninety-seven and eight percent (97.8%) or provided in the most recently established cavern composition

CE% = capture efficiency and destruction efficiency of ninety-eight percent (98%)

Volume of propane vented shall be calculated using USEPA's TANKS program (version 4.0 or its updates) or equivalent such as engineering calculations.

- (c) Compliance with the VOC emission limitations in Condition D.1.2 shall be determined as follows:

$$\text{VOC (tons/month)} = \{[V_3 \times \text{VOC\%} / 2000 \text{ tons/lb}] \times (1-\text{CE\%})\}$$

Where:

$V_3$  = Volume propane vented from Cavern 3 (lbs/month)

VOC% = VOC weight percent of ninety-seven and eight percent (97.8%) or provided in the most recently established cavern composition

CE% = capture efficiency and destruction efficiency of ninety-eight percent (98%)

Volume of propane vented shall be calculated using USEPA's TANKS program (version 4.0 or its updates) or equivalent such as engineering calculations.

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

### D.1.5 Flare Parametric Monitoring

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To demonstrate compliance status with Conditions D.1.1 and D.1.2, the Permittee shall continuously monitor the presence of the flare pilot flame using a thermocouple, infrared monitor, visual observation or any other equivalent device to detect the presence of a flame at all times when venting operations occur at either underground cavern facility. For the purpose of this condition, continuous means no less than once per fifteen (15) minutes. If a condition exists which should result in a response step, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

### **D.1.6 Record Keeping Requirement [326 IAC 8-4-3]**

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- (a) Pursuant to 326 IAC 8-4-3(d), the Permittee shall maintain records of the types of volatile petroleum liquid stored, the maximum true vapor pressure of the liquid as stored, and the results of the inspections performed on Tank 3018.
- (b) To document compliance with condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) and (6) below. Records maintained for (1) and (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limit established in condition D.1.1 and D.1.2.
  - (1) The volume propane vented from Cavern 2.
  - (2) The volume propane vented from Cavern 3.
  - (3) The VOC weight percent of composition of Cavern 2.
  - (4) The VOC weight percent of composition of Cavern 3.
  - (5) The VOC emitted from Cavern 2 for each month and each compliance period.
  - (6) The VOC emitted from Cavern 3 for each month and each compliance period.
- (c) To document the compliance status with Condition D.1.5, the Permittee shall maintain records of temperature, visual observations, or other parameters sufficient to demonstrate the presence of a pilot flame when venting operations occur at Cavern 2 and Cavern 3.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

### **D.1.7 Reporting Requirements**

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A quarterly summary of the information to document the compliance status with Condition D.1.1 and D.1.2, shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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**SECTION E.1**

**NSPS**

**Emissions Unit Description:**

- (r) One (1) internal floating roof tank identified as Tank No. 3018, with a capacity of 955,988 gallons and a maximum withdrawal rate of 10,000 barrels per hour of Natural Gasoline, Gasoline and petroleum products, Jet A Kerosene, Diesel and similar low VP product, and exhausting to stack 018 (constructed in 1980).

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

**New Source Performance Standards (NSPS) Requirements [326 IAC 2-8-4 (1)]**

**E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR Part 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, for the above listed emissions units, except as otherwise specified in 40 CFR Part 60, Subpart Kb.

- (b) Pursuant to 40 CFR 60.4, 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

and

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

**E.1.2 Volatile Organic Liquid Storage Vessels NSPS [326 IAC 12][40 CFR Part 60, Subpart Kb]**

Pursuant to 40 CFR Part 60, Subpart Kb, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart Kb, which are incorporated by reference as 326 IAC 12 (included as Attachment A to this permit), for the above listed emissions units as specified as follows.

- (1) 40 CFR 60.110(b);
- (2) 40 CFR 60.110(a);
- (3) 40 CFR 60.110(c);
- (4) 40 CFR 60.111(b);
- (5) 40 CFR 60.112(b);
- (6) 40 CFR 60.112(a)(1);
- (7) 40 CFR 60.112(a)(3)(i);
- (8) 40 CFR 60.112(a)(4);
- (9) 40 CFR 60.113(b);
- (10) 40 CFR 60.113(a);
- (11) 40 CFR 60.113(c);
- (12) 40 CFR 60.114(b);
- (13) 40 CFR 60.115(a);

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- (14) 40 CFR 60.115(b);
- (15) 40 CFR 60.115(c);
- (16) 40 CFR 60.116(a);
- (17) 40 CFR 60.116(b);
- (18) 40 CFR 60.116(c);
- (19) 40 CFR 60.116(e);
- (20) 40 CFR 60.116(f);
- (21) 40 CFR 60.116(g);
- (22) 40 CFR 60.117b.



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**SECTION E.2**

**NESHAP**

**Emissions Unit Description:**

- (b) One (1) compression ignition emergency generator manufactured in January of 2006 and installed in February of 2006, rated at two hundred twenty-four (224) horsepower. [40 CFR 63, Subpart ZZZZ]

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

**E.2.1 General Provisions Relating to NESHAP ZZZZ [326 IAC 20-1][40 CFR Part 63, Subpart A]**

- (a) Pursuant to 40 CFR 63.6665, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 8 of 40 CFR 63, Subpart ZZZZ in accordance with the Schedule in 40 CFR Part 63, Subpart ZZZZ.

- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

**E.2.2 Stationary Reciprocating Internal Combustion Engines NESHAP [40 CFR Part 63, Subpart ZZZZ][326 IAC 20-82]**

The Permittee which engages in the use of a reciprocating internal combustion engine shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ, which are incorporated by reference as 326 IAC 20-82 (included as Attachment B of this permit) no later than May 3, 2013:

- (1) 40 CFR 63.6580;
- (2) 40 CFR 63.6585(a);
- (3) 40 CFR 63.6585(c);
- (4) 40 CFR 63.6590(a)(1)(iii)
- (5) 40 CFR 63.6595(a)(1);
- (6) 40 CFR 63.6695(c);
- (7) 40 CFR 63.6603(a);
- (8) 40 CFR 63.6605;
- (9) 40 CFR 63.6625(e)(3);
- (10) 40 CFR 63.6625(f);
- (11) 40 CFR 63.6625(h);
- (12) 40 CFR 63.6625(i);
- (13) 40 CFR 63.6640(a);
- (14) 40 CFR 63.6640(b);
- (15) 40 CFR 63.6640(e);
- (16) 40 CFR 63.6640(f)(1);
- (17) 40 CFR 63.6645(a)(5);
- (18) 40 CFR 63.6655(a);
- (19) 40 CFR 63.6655(e)(2);
- (20) 40 CFR 63.6655(f)(2);
- (21) 40 CFR 63.6660;
- (22) 40 CFR 63.6665;
- (23) 40 CFR 63.6670;

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- (24) 40 CFR 63.6675;
- (25) Table 2d to 40 CFR 63 Subpart ZZZZ;
- (26) Table 8 to 40 CFR 63 Subpart ZZZZ.

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

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

Source Name: Enterprise Terminals & Storage LLC  
Source Address: 10197 E CR 1000N, Seymour, Indiana 47274  
FESOP Permit No.: F071-34698-00007

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Enterprise Terminals & Storage LLC  
Source Address: 10197 E CR 1000N, Seymour, Indiana 47274  
FESOP Permit No.: F071-34698-00007

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

**DRAFT**

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

**Page 2 of 2**

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

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

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

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

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

**DRAFT**

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

**FESOP Quarterly Report**

Source Name: Enterprise Terminals & Storage LLC  
Source Address: 10197 E CR 1000N, Seymour, Indiana 47274  
FESOP Permit No.: F071-34698-00007  
Facility: Cavern 2 and Cavern 3  
Parameter: VOC Emissions, Combined  
Limit: Shall not exceed 32.00 tons of VOC per twelve (12) consecutive month period,  
with compliance determined at the end of each month.

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

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

**DRAFT**

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

**FESOP Quarterly Report**

Source Name: Enterprise Terminals & Storage LLC  
Source Address: 10197 E CR 1000N, Seymour, Indiana 47274  
FESOP Permit No.: F071-34698-00007  
Facility: Cavern 3  
Parameter: VOC Emissions  
Limit: 20.66 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

**DRAFT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Enterprise Terminals & Storage LLC  
Source Address: 10197 E CR 1000N, Seymour, Indiana 47274  
FESOP Permit No.: F071-34698-00007

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

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**



**DRAFT**

Page 2 of 2

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

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

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

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

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

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

**Technical Support Document (TSD) for a Significant Permit Revision to a  
Federally Enforceable State Operating Permit (FESOP)**

**Source Description and Location**

<b>Source Name:</b>	Enterprise Terminals & Storage, LLC
<b>Source Location:</b>	10197 E County Road 1000 N, Seymour, Indiana 47274
<b>County:</b>	Jackson
<b>SIC Code:</b>	4613 (Petroleum Pipelines, Refined)
<b>Operation Permit No.:</b>	F071-34698-00007
<b>Operation Permit Issuance Date:</b>	November 5, 2014
<b>Significant Permit Revision No.:</b>	071-35950-00007
<b>Permit Reviewer:</b>	J Alexander

On June 15, 2015, the Office of Air Quality (OAQ) received an application from Enterprise Terminals & Storage, LLC related to a modification to an existing stationary refined petroleum pipeline terminal.

**Existing Approvals**

The source was issued FESOP No. F071-34698-00007 on November 5, 2014. There have been no subsequent approvals issued.

**County Attainment Status**

The source is located in Jackson County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Jackson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
Jackson County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) **Other Criteria Pollutants**  
Jackson County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Fugitive Emissions

Since this source is classified as a petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, it is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2, 326 IAC 2-3, and 326 IAC 2-7. Therefore, fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

### Status of the Existing Source

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

This PTE table is from the TSD or Appendix A of F071-34698-00007 on November 5, 2014.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10*	PM2.5*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Benzene
Storage Tanks	-	-	-	-	-	52.60	-	13.72	5.25
Roof Landing	-	-	-	-	-	8.89	-	-	-
Emergency Generators	5.71E-03	0.02	0.02	1.80E-03	0.30	0.02	0.25	5.67E-03	6.31E-06
Other Combustion Units	0.07	0.29	0.29	0.31	5.45	0.40	3.05	-	-
Cavern 3	0.05	0.18	0.18	0.25	1.62	20.66	8.80	0.03	9.20E-07
<b>Total PTE of Entire Source</b>	<b>0.13</b>	<b>0.50</b>	<b>0.50</b>	<b>0.56</b>	<b>7.37</b>	<b>82.57</b>	<b>12.11</b>	<b>13.75</b>	<b>5.25</b>
Title V Major Source Thresholds**	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	100	100	100	100	100	100	100	NA	NA

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of 100 tons per year or more, and it is one of the twenty-eight (28) listed source categories as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

### Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Enterprise Terminals & Storage, LLC on June 15, 2015, relating to switching underground storage Cavern 2 from isobutane to propane service. This cavern will be controlled by an existing flare that also controls Cavern 3. The following is a description of the modified emission unit and pollution control device:

- ## Enforcement Issues

## Emission Calculations

### Permit Level Determination – FESOP Revision

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Hexane
Cavern 2	0.03	0.10	0.10	0.14	0.91	562.65	4.95	8.27E-04	7.88E-04
<b>Total PTE of Proposed Revision</b>	0.03	0.10	0.10	0.14	0.91	562.65	4.95	8.27E-04	7.88E-04

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

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM10*	PM2.5*	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Benzene
Storage Tanks	-	-	-	-	-	52.60	-	13.72	5.25
Roof Landing	-	-	-	-	-	8.89	-	-	-
Emergency Generators	5.71E-03	0.02	0.02	1.80E-03	0.30	0.02	0.25	5.67E-03	6.31E-06
Other Combustion Units	0.07	0.29	0.29	0.31	5.45	0.40	3.05	-	-
Cavern 3	0.05	0.18	0.18	0.25	1.62	20.66	8.80	0.03	9.20E-07
<b>Cavern 2</b>	<b>0.03</b>	<b>0.10</b>	<b>0.10</b>	<b>0.14</b>	<b>0.91</b>	<b>32.00</b>	<b>4.95</b>	<b>8.27E-04</b>	<b>9.20E-07</b>
Total PTE of Entire Source	0.13 <b>0.16</b>	0.50 <b>0.60</b>	0.50 <b>0.60</b>	0.56 <b>0.70</b>	7.37 <b>8.28</b>	82.57 <b>93.91</b>	12.11 <b>17.05</b>	13.75	5.25
Title V Major Source Thresholds**	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	100	100	100	100	100	100	100	NA	NA

negl. = negligible  
\*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".  
\*\* PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted).

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM10*	PM2.5*	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Benzene
Storage Tanks	-	-	-	-	-	52.60	-	13.72	5.25
Roof Landing	-	-	-	-	-	8.89	-	-	-
Emergency Generators	5.71E-03	0.02	0.02	1.80E-03	0.30	0.02	0.25	5.67E-03	6.31E-06
Other Combustion Units	0.07	0.29	0.29	0.31	5.45	0.40	3.05	-	-
Cavern 3	0.05	0.18	0.18	0.25	1.62	32.00	8.80	0.03	9.20E-07
Cavern 2	0.03	0.10	0.10	0.14	0.91		4.95	8.27E-04	9.20E-07
<b>Total PTE of Entire Source</b>	<b>0.16</b>	<b>0.60</b>	<b>0.60</b>	<b>0.70</b>	<b>8.28</b>	<b>93.91</b>	<b>17.05</b>	<b>13.75</b>	<b>5.25</b>
Title V Major Source Thresholds**	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	100	100	100	100	100	100	100	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". ** PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .									

(a) FESOP Status

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

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) The VOC emissions from the underground caverns, identified as Cavern 2 and Cavern 3, shall not exceed 32.00 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

**Federal Rule Applicability Determination**

New Source Performance Standards (NSPS)

- (a) The requirements of the NSPS for Bulk Gasoline Terminals, 40 CFR 60, Subpart XX (326 IAC 12), are not included in the permit, because the source does not deliver liquid products into gasoline tank trucks.
- (b) The requirements of the 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 (326 IAC 12), are not included in the permit because Cavern 2 is a subsurface cavern which is not included under the definition of a storage vessel.
- (c) Cavern 2 is not subject to the requirements of the 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 (326 IAC 12), because Cavern 2 is a subsurface cavern which is not included under the definition of a storage vessel.

- (d) The requirements of the New Source Performance Standard 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 and 326 IAC 12, because Cavern 2 is a subsurface cavern which is not included under the definition of a storage vessel.
- (e) There are no new other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (f) There are no new National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed revision.

Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability Determination</b>
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- (a) 326 IAC 2-8-4 (FESOP)  
This revision to an existing Title V minor stationary source will not change the minor status of the source because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))  
This modification to an existing PSD minor stationary source will not change the PSD minor status because the potential to emit for all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new unit is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 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.
- (e) 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:
  - (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.

- (f) 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.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
This rule applies to sources that have potential fugitive particulate emissions after the effect of any controls is equal to or greater than 25 tons per year. (A fugitive particulate matter emissions means particulate matter which is emitted from any source by means other than a stack.) The potential fugitive particulate emissions (after the effect of any controls) from the source is less than 25 tons per year. Therefore, the requirements of this rule are not applicable to the source.
- (h) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
While Cavern 2 has to potential to emit more than 25 tons of VOC per year and not subject to any other article, 326 IAC 8-1-6 does not apply to the unit because it was constructed before 1980.
- (i) There are no other 326 IAC 8 Rules that are applicable to the unit.
- (j) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (k) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

#### Compliance Determination, Monitoring and Testing Requirements

The compliance determination and monitoring requirements applicable to this proposed revision are as follows:

Emission Unit	Control	Operating Parameters	Frequency
Cavern 2	Flare	Presence of the flare pilot flame	No less than once per fifteen (15) minutes

This monitoring conditions are necessary because the flare for Cavern 2 operate properly to ensure compliance with 326 IAC 2-8 (FESOP) and render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### Proposed Changes

The changes listed below have been made to FESOP Renewal No. F071-34698-00007. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**.

##### *Summary of IDEM Updates Throughout the Permit*

- (a) **Section C - Overall Source Limit**  
IDEM, OAQ has clarified Section C - Overall Source Limit to be consistent with the change in the federal rule.

##### *Section A - Revisions*

- (a) Cavern 2 has been added to the emisisions units descriptions.

*Section A has been revised as follows:*

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

---

\*\*\*

- (w) **One (1) underground propane storage cavern, identified as Cavern 2, constructed in 1976, approved in 2015 for modification, with a maximum storage capacity of 408,000 barrels, using a flare as control, equipped with a 0.1 MMBtu/hr natural gas or propane fired pilot light.**

*Section C - Revisions*

Section C has been revised to incorporate the appropriate IDEM updates detailed above under "Summary of IDEM Updates Throughout the Permit."

*Section C has been revised as follows:*

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

---

\*\*\*

- (a) \*\*\*
- (1) The potential to emit any regulated pollutant, except particulate matter (PM) ~~and greenhouse gases (GHGs)~~, from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- \*\*\*
- (4) ~~The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub>-equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.~~
- \*\*\*

*Section D.1 - Revisions*

- (a) Section D.1 has been updated to include the requirements for Cavern 2.

*Section D.1 has been revised as follows:*

\*\*\*

- (w) **One (1) underground propane storage cavern, identified as Cavern 2, constructed in 1976, approved in 2015 for modification, with a maximum storage capacity of 408,000 barrels, using a flare as control, equipped with a 0.1 MMBtu/hr natural gas or propane fired pilot light.**

\*\*\*

D.1.1 FESOP and Prevention of Significant Deterioration (PSD) Minor Limits [326 IAC 2-8-4]  
[326 IAC 2-2]

---

Pursuant to 326 IAC 2-8-4 (FESOP), the **combined** VOC emission from the underground ~~cavern caverns~~, identified as **Cavern 2 and Cavern 3**, shall not exceed ~~20.66~~**32.00** tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.

\*\*\*



#### D.1.4 VOC Control

---

- (a) ~~In order to ensure compliance with Condition D.1.1 and D.1.2, the flare for VOC control shall be in operation and control emissions from the underground cavern at all times when venting operations occur at underground cavern facility.~~ **In order to ensure compliance with Condition D.1.1 and D.1.2, the flare for VOC control shall be in operation and control emissions from Cavern 2 and Cavern 3 at all times when venting operations occur at Cavern 2 or Cavern 3.**
- (b) **Compliance with the VOC emission limitations in Condition D.1.1 shall be determined as follows:**

$$\text{VOC (tons/month)} = \{[V_2 \times \text{VOC\%} / 2000 \text{ tons/lb}] \times (1-\text{CE\%})\} + \{[V_3 \times \text{VOC\%} / 2000 \text{ tons/lb}] \times (1-\text{CE\%})\}$$

**Where:**

- $V_2$  = Volume propane vented from Cavern 2 (lbs/month)  
 $V_3$  = Volume propane vented from Cavern 3 (lbs/month)  
**VOC%** = VOC weight percent of ninety-seven and eight percent (97.8%) or provided in the most recently established cavern composition  
**CE%** = capture efficiency and destruction efficiency of ninety-eight percent (98%)

**Volume of propane vented shall be calculated using USEPA's TANKS program (version 4.0 or its updates) or equivalent such as engineering calculations.**

- (c) Compliance with the VOC emission limitations in Condition D.1.2 shall be determined as follows:

$$\text{VOC (tons/month)} = \{[V_3 \text{ (lb/month)} \times \text{VOC\%} / 2000 \text{ tons/lb}] \times (1-\text{CE\%})\}$$

**Where:**

- $V_3$  = Volume propane vented from Cavern 3 (lbs/month)  
**VOC%** = VOC weight percent of ninety-seven and eight percent (97.8%) or provided in the most recently established cavern composition  
**CE%** = capture efficiency and destruction efficiency of ninety-eight percent (98%)

**Volume of propane vented shall be calculated using USEPA's TANKS program (version 4.0 or its updates) or equivalent such as engineering calculations.**

#### D.1.5 Flare Parametric Monitoring

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To demonstrate compliance status with Conditions D.1.1 and D.1.2, the Permittee shall continuously monitor the presence of the flare pilot flame using a thermocouple, infrared monitor, visual observation or any other equivalent device to detect the presence of a flame at all times when venting operations occur at ~~the~~**either** underground cavern facility. For the purpose of this condition, continuous means no less than once per fifteen (15) minutes. If a condition exists which should result in a response step, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.6 Record Keeping Requirement [326 IAC 8-4-3]

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(b) To document compliance with condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) and (6) below. Records maintained for (1) and (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limit established in condition D.1.1 and D.1.2.

- (1) The volume propane vented from Cavern 2.
- (2) The volume propane vented from Cavern 3.
- (3) The VOC weight percent of composition of Cavern 2.
- (4) The VOC weight percent of composition of Cavern 3.
- (5) The VOC emitted from Cavern 2 for each month and each compliance period.
- (6) The VOC emitted from Cavern 3 for each month and each compliance period.

(c) To document the compliance status with Condition D.1.5, the Permittee shall maintain records of temperature, visual observations, or other parameters sufficient to demonstrate the presence of a pilot flame when venting operations occur at Cavern 2 and Cavern 3.

(ed) \*\*\*

*E Section and forms - Revisions*

(a) A quarterly report form was added for the updated VOC emission limit.

*E Section and forms have been revised as follows:*

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

**FESOP Quarterly Report**

Source Name:	Enterprise Terminals & Storage LLC
Source Address:	10197 E CR 1000N, Seymour, Indiana 47274
FESOP Permit No.:	F071-34698-00007
Facility:	Cavern 2 and Cavern 3
Parameter:	VOC Emissions
Limit:	Combined 32.00 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

#### Conclusion and Recommendation

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 071-35950-00007. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

#### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to J Alexander 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) 233-1782 or toll free at 1-800-451-6027 extension 3-1782.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations  
PTE Summary**

**Company Name:** Enterprise Terminals & Storage, LLC  
**Address City IN Zip:** 10197 E. County Road 1000 North, Seymour, IN 47274  
**Permit No.:** F071-34698-00007  
**SPR No.:** 071-35950-00007  
**Reviewer:** Julie Alexander

Uncontrolled Potential to Emit (tons/yr)							
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NOx	VOC	CO
<i>Existing Units</i>							
Storage Tanks	-	-	-	-	-	52.60	-
Cavern 3	0.05	0.18	0.18	0.25	1.62	1,032.93	8.80
Roof Landing	-	-	-	-	-	8.89	-
Emergency Generator	5.71E-03	0.02	0.02	1.80E-03	0.30	0.02	0.25
Other Combustion Units	0.07	0.29	0.29	0.31	5.45	0.40	3.05
<b>Existing Total</b>	<b>0.13</b>	<b>0.50</b>	<b>0.50</b>	<b>0.56</b>	<b>7.37</b>	<b>1,094.84</b>	<b>12.11</b>
<i>New Emission Unit</i>							
Cavern 2	0.03	0.10	0.10	0.14	0.91	562.65	4.95
<b>Source Wide Total</b>	<b>0.16</b>	<b>0.60</b>	<b>0.60</b>	<b>0.70</b>	<b>8.28</b>	<b>1,657.49</b>	<b>17.05</b>

Potential to Emit after Control (tons/yr)							
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NOx	VOC	CO
<i>Existing Units</i>							
Storage Tanks	-	-	-	-	-	52.60	-
Cavern 3	0.05	0.18	0.18	0.25	1.62	20.66	8.80
Roof Landing	-	-	-	-	-	8.89	-
Emergency Generator	5.71E-03	0.02	0.02	1.80E-03	0.30	0.02	0.25
Other Combustion Units	0.07	0.29	0.29	0.31	5.45	0.40	3.05
<b>Existing Total</b>	<b>0.13</b>	<b>0.50</b>	<b>0.50</b>	<b>0.56</b>	<b>7.37</b>	<b>82.57</b>	<b>12.11</b>
<i>New Emission Unit</i>							
Cavern 2	0.03	0.10	0.10	0.14	0.91	11.25	4.95
<b>Source Wide Total</b>	<b>0.16</b>	<b>0.60</b>	<b>0.60</b>	<b>0.70</b>	<b>8.28</b>	<b>93.82</b>	<b>17.05</b>

Potential to Emit after Issuance (tons/yr)							
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NOx	VOC	CO
Storage Tanks	-	-	-	-	-	52.60	-
Cavern 3	0.05	0.18	0.18	0.25	1.62	32.00	8.80
Cavern 2	0.03	0.10	0.10	0.14	0.91		4.95
Roof Landing	-	-	-	-	-	8.89	-
Emergency Generator	5.71E-03	0.02	0.02	1.80E-03	0.30	0.02	0.25
Other Combustion Units	0.07	0.29	0.29	0.31	5.45	0.40	3.05
<b>Total</b>	<b>0.16</b>	<b>0.60</b>	<b>0.60</b>	<b>0.70</b>	<b>8.28</b>	<b>93.91</b>	<b>17.05</b>

Note: The shaded cells indicate where limits are included.

\* PM2.5 listed is direct PM2.5

\*\* Insignificant Activity (VOC emissions) - Tank Bottom Treatment System

\*\*\* No HAP data given for liquefied petroleum gas combustion on AP-42 1.5

TEPPCO operates a treatment system for water that accumulates in product storage tanks at the Seymour Terminal. This system consists of a primary gravity oil/water separator, a sand/carbon filter unit, a 100,000 gallon influent equalization tank, a secondary gravity oil/water separator, an activated sludge biological system and two 100,000 gallon effluent holding tanks. Flow through the treatment system is 2 gallons per minute. The treatment system is permitted to discharge wastewater, hydrostatic test water, and storm water potentially contaminated with petroleum hydrocarbons under NPDES general permit number 340007. Total VOC emissions from the system are below insignificant threshold at: 0.41 lb/hr (equivalent to 1.80 tons per year).

**Appendix A: Emission Calculations  
HAPs Summary**

**Company Name:** Enterprise Terminals & Storage, LLC  
**Address City IN Zip:** 10197 E. County Road 1000 North, Seymour, IN 47274  
**Permit No.:** F071-34698-00007  
**SPR No.:** 071-35950-00007  
**Reviewer:** Julie Alexander

<b>Uncontrolled Potential to Emit (tons/yr)</b>													
<b>Emission Unit</b>	Benzene	Dichlorobenzene	Toluene	Formaldehyde	Ethylbenzene	Xylenes	Hexane	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
<i>Existing Units</i>													
Storage Tanks	5.25	-	3.27	-	0.61	1.46	3.13	-	-	-	-	-	13.72
Cavern 3	9.20E-07	5.26E-07	1.49E-06	3.29E-05	-	-	7.88E-04	2.19E-07	4.82E-07	6.13E-07	1.66E-07	9.20E-07	1.27
Emergency Generator	6.31E-06	3.61E-06	1.02E-05	2.25E-04	-	-	5.41E-03	1.50E-06	3.31E-06	4.21E-06	1.14E-06	6.31E-06	5.67E-03
<b>Existing Total</b>	<b>5.25</b>	<b>4.13E-06</b>	<b>3.27</b>	<b>2.58E-04</b>	<b>0.61</b>	<b>1.46</b>	<b>3.14</b>	<b>1.72E-06</b>	<b>3.79E-06</b>	<b>4.82E-06</b>	<b>1.31E-06</b>	<b>7.23E-06</b>	<b>15.00</b>
<i>New Emission Unit</i>													
Cavern 2	9.20E-07	5.26E-07	1.49E-06	3.29E-05	-	-	7.88E-04	2.19E-07	4.82E-07	6.13E-07	1.66E-07	9.20E-07	8.27E-04
<b>Source Wide Total</b>	<b>5.25</b>	<b>4.66E-06</b>	<b>3.27</b>	<b>2.91E-04</b>	<b>0.61</b>	<b>1.46</b>	<b>3.14</b>	<b>1.94E-06</b>	<b>4.27E-06</b>	<b>5.43E-06</b>	<b>1.48E-06</b>	<b>8.15E-06</b>	<b>15.00</b>

<b>Controlled Potential to Emit (tons/yr)</b>													
<b>Emission Unit</b>	Benzene	Dichlorobenzene	Toluene	Formaldehyde	Ethylbenzene	Xylenes	Hexane	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
<i>Existing Units</i>													
Storage Tanks	5.25	-	3.27	-	0.61	1.46	3.13	-	-	-	-	-	13.72
Cavern 3	9.20E-07	5.26E-07	1.49E-06	3.29E-05	-	-	7.88E-04	2.19E-07	4.82E-07	6.13E-07	1.66E-07	9.20E-07	0.03
Emergency Generator	6.31E-06	3.61E-06	1.02E-05	2.25E-04	-	-	5.41E-03	1.50E-06	3.31E-06	4.21E-06	1.14E-06	6.31E-06	5.67E-03
<b>Existing Total</b>	<b>5.25</b>	<b>4.13E-06</b>	<b>3.27</b>	<b>2.58E-04</b>	<b>0.61</b>	<b>1.46</b>	<b>3.14</b>	<b>1.72E-06</b>	<b>3.79E-06</b>	<b>4.82E-06</b>	<b>1.31E-06</b>	<b>7.23E-06</b>	<b>13.75</b>
<i>New Emission Unit</i>													
Cavern 2	9.20E-07	5.26E-07	1.49E-06	3.29E-05	-	-	7.88E-04	2.19E-07	4.82E-07	6.13E-07	1.66E-07	9.20E-07	8.27E-04
<b>Source Wide Total</b>	<b>5.25</b>	<b>4.66E-06</b>	<b>3.27</b>	<b>2.91E-04</b>	<b>0.61</b>	<b>1.46</b>	<b>3.14</b>	<b>1.94E-06</b>	<b>4.27E-06</b>	<b>5.43E-06</b>	<b>1.48E-06</b>	<b>8.15E-06</b>	<b>13.75</b>

<b>Potential to Emit after Issuance (tons/yr)</b>													
<b>Emission Unit</b>	Benzene	Dichlorobenzene	Toluene	Formaldehyde	Ethylbenzene	Xylenes	Hexane	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
<i>Existing Units</i>													
Storage Tanks	5.25	-	3.27	-	0.61	1.46	3.13	-	-	-	-	-	13.72
Cavern 3	9.20E-07	5.26E-07	1.49E-06	3.29E-05	-	-	7.88E-04	2.19E-07	4.82E-07	6.13E-07	1.66E-07	9.20E-07	0.03
Emergency Generator	6.31E-06	3.61E-06	1.02E-05	2.25E-04	-	-	5.41E-03	1.50E-06	3.31E-06	4.21E-06	1.14E-06	6.31E-06	5.67E-03
<b>Existing Total</b>	<b>5.25</b>	<b>4.13E-06</b>	<b>3.27</b>	<b>2.58E-04</b>	<b>0.61</b>	<b>1.46</b>	<b>3.14</b>	<b>1.72E-06</b>	<b>3.79E-06</b>	<b>4.82E-06</b>	<b>1.31E-06</b>	<b>7.23E-06</b>	<b>13.75</b>
<i>New Emission Unit</i>													
Cavern 2	9.20E-07	5.26E-07	1.49E-06	3.29E-05	-	-	7.88E-04	2.19E-07	4.82E-07	6.13E-07	1.66E-07	9.20E-07	8.27E-04
<b>Source Wide Total</b>	<b>5.25</b>	<b>4.66E-06</b>	<b>3.27</b>	<b>2.91E-04</b>	<b>0.61</b>	<b>1.46</b>	<b>3.14</b>	<b>1.94E-06</b>	<b>4.27E-06</b>	<b>5.43E-06</b>	<b>1.48E-06</b>	<b>8.15E-06</b>	<b>13.75</b>

### Appendix A: Emission Calculations VOC/HAP Emissions from Cavern 2

**Company Name:** Enterprise Terminals & Storage, LLC  
**Address City IN Zip:** 10197 E. County Road 1000 North, Seymour, IN 47274  
**Permit No.:** F071-34698-00007  
**SPR No.:** 071-35950-00007  
**Reviewer:** Julie Alexander

#### OPERATING PARAMETERS

Vent Gas Material	Propane Stream
Venting Event Material Volume (liquid)	6,530 bbl/yr

#### DIMENSIONAL ANALYSIS

Mass Conversion	0.4536 kg/lb	NIST SP1038
Mass Conversion	2,000 lb/ton	NIST SP1038
Mass Conversion	7,000 gr/lb	NIST SP1038
Time Conversion	8,760 hr/yr	
Heat Input Capacity	1,000,000 Btu/MMBtu	
Volume Conversion	1,000,000 scf/MMscf	
Volume Conversion	1,000 gal/10 <sup>3</sup> gal	
Volume Conversion	42 gal/bbl	
Default Natural Gas HHV	1,020 MMBtu/MMscf	AP-42, Section 1.4, footnote "a" to Table 1.4-1

#### VENTED GAS STREAM CALCULATIONS

Flare Destruction Efficiency	0.98 unitless	Established from vendor supplied data for flaring propane and the maximum recommended
Propane Heating Value	90,962 Btu/gal	Physical Properties of Hydrocarbons, API Research Project 44, Rev. 1981, Fig. 16-1, pag
Propane Heating Value	21,499 Btu/lb	Physical Properties of Hydrocarbons, API Research Project 44, Rev. 1981, Fig. 16-1, pag
Propane Heating Value	2,517 MMBtu/MMscf	Physical Properties of Hydrocarbons, API Research Project 44, Rev. 1981, Fig. 16-1, pag
Propane Density	4.19 lb/gal	Propane density
Maximum Hourly Flow Rate	9,949 lb/hr	Flare maximum recommended feed rate for propane
Maximum Annual Flow Rate (Liquid)	2.4 10 <sup>3</sup> gal/hr	= Maximum Hourly Flow Rate (lb/hr) / Propane Density (lb/gal) / 1,000 (gal/10 <sup>3</sup> gal)
Maximum Annual Flow Rate (Liquid)	274,260 gal/yr	= Venting Event Material Volume (bbl) x Annual Venting Events (events/yr) x 42 (gal/bbl)
Maximum Annual Flow Rate (Liquid)	274 10 <sup>3</sup> gal/yr	= Maximum Annual Flow Rate (gal/yr) / 1,000 (gal/10 <sup>3</sup> gal)
Maximum Annual Flow Rate (Liquid)	1,150,438 lb/yr	= Maximum Annual Flow Rate (gal/yr) x Propane Density (lb/gal)
Heat Input Capacity (Propane)	24,947 MMBtu/yr	= Maximum Annual Flow Rate (gal/yr) x Propane Heating Value (Btu/gal) / 1,000,000 (Btu

#### PILOT LIGHT/PURGE GAS/SUPPLEMENTAL FUEL PROPERTIES

Pilot Natural Gas Use	100 scf/hr	
Pilot Natural Gas Use	0.876 MMscf/yr	= Pilot Natural Gas Use (MMscf/hr) x 8,760 (hr/yr)
Pilot Propane Use	0.876 MMscf/yr	Natural gas equivalent, used for estimating pilot propane HAP emissions
Pilot Propane Use	894 MMBtu/yr	Equivalent to heat input when using natural gas
Pilot Propane Use	9.82 10 <sup>3</sup> gal/yr	= Pilot Propane Use (MMBtu/yr) x 1,000,000 (Btu/MMBtu) / Propane heating value (Btu/g)
Flare Natural Gas Heat Input Capacity	1.00E-04 MMscf/hr	= Flare Natural Gas Use (scf/hr) / 1,000,000 (scf/MMscf)
Flare Natural Gas Heat Input Capacity	894 MMBtu/yr	= Flare Natural Gas Use (MMscf/yr) x Natural Gas HHV (MMBtu/MMscf)

#### VENTED MATERIAL COMPOSITION

VOC Weight Percent	97.8% unitless	Lab analysis for similar source
Total HAP Weight Percent	1.20E-03 unitless	Lab analysis for similar source

#### GAS PROPERTIES (STANDARD CONDITIONS)

Reference Temperature	77 °F	Standard temperature
Reference Temperature	537 °R	Conversion from Fahrenheit to Rankine
Reference Pressure	14.7 psia	Atmospheric pressure
Gas Law Constant	10.732 ft <sup>3</sup> -psi/R-lbmol	Gas law constant
Molar Volume (Standard Conditions)	392 scf/lbmol	= Gas Law Constant (ft <sup>3</sup> -psi/R-lbmol) x Reference Temperature (°R) / Reference Pressure
Vent Gas Molecular Weight	43.89 lb/lbmol	Lab analysis for similar source
Vent Gas Density	0.11 lb vent gas/scf	= Vent Gas Molecular Weight (lb/lbmol) / Molar Volume (scf/lbmol)

#### POLLUTANT PROPERTIES

Sulfur Content	123 ppm	Product specifications
Sulfur Content	0.86 gr/lb vent gas	= Sulfur Content (ppm) / 1,000,000 [ppm / (lb/lb vent gas)] x 7,000 (gr/lb)
Sulfur Content	9.6 gr/100 scf	= Sulfur Content (gr/lb vent gas) x Vent Gas Density (lb vent gas/scf) x 100 scf

#### EMISSION FACTORS (PROPANE)

PM	0.2 lb/10 <sup>3</sup> gallons	AP-42, Section 1.5, Table 1.5-1 for LPG (propane) combustion
PM10	0.7 lb/10 <sup>3</sup> gallons	AP-42, Section 1.5, Table 1.5-1 for LPG (propane) combustion
PM2.5	0.7 lb/10 <sup>3</sup> gallons	AP-42, Section 1.5, Table 1.5-1 for LPG (propane) combustion
SO <sub>2</sub>	1.0 lb/10 <sup>3</sup> gallons	AP-42, Section 1.5, Table 1.5-1 for LPG (propane) combustion; SO <sub>2</sub> emissions (lb/10 <sup>3</sup> gal)
VOC	1.0 lb/10 <sup>3</sup> gallons	AP-42, Section 1.5, Table 1.5-1 for LPG (propane) combustion
CO	0.37 lb/MMBtu	AP-42 Section 13.5, Table 13.5-1 (9/91)
NO <sub>x</sub>	0.068 lb/MMBtu	AP-42 Section 13.5, Table 13.5-1 (9/91)

Vented Gas Emissions	Uncontrolled (tons/yr)	Controlled (tons/yr)
PM	-	-
PM10	-	-
PM2.5	-	-
SO <sub>2</sub>	-	-

**Appendix A: Emission Calculations**  
**VOC/HAP Emissions from Cavern 2**

**Company Name:** Enterprise Terminals & Storage, LLC  
**Address City IN Zip:** 10197 E. County Road 1000 North, Seymour, IN 47274  
**Permit No.:** F071-34698-00007  
**SPR No.:** 071-35950-00007  
**Reviewer:** Julie Alexander

NO <sub>x</sub>	-	-
VOC	562.51	11.25
CO	-	-
Total HAP	0.69	0.01

<sup>1</sup> NO<sub>x</sub> and CO emissions (tpy) = Heat Input Capacity from Vent Gas (MMBtu/yr) x Vent Gas Combustion Pollutant EF (lb/MMBtu) / 2,000 (lb/ton)

PM/PM<sub>10</sub>/PM<sub>2.5</sub> and SO<sub>2</sub> Emissions (tpy) = Maximum Annual Vent Gas Flow Rate (10<sup>3</sup> gal/yr) x Pollutant EF (lb/10<sup>3</sup> gal) / 2,000 (lb/ton)

Controlled VOC Emissions (tpy) = Maximum Annual Vent Gas Flow Rate (lb/yr) x Pollutant Weight Percent (%) x [1 - Flare Destruction Efficiency (%) / 2,000 (lb/ton)]

Controlled HAP Emissions (tpy) = [Heat Input Capacity from Vent Gas (MMBtu/yr) x Total HAP Combustion EF (lb/MMBtu) x Flare Destruction Efficiency (%) + Maximum Air Pollutant Weight Percent (%) x (1 - Flare Destruction Efficiency (%))] / 2,000 (lb/ton)

Flare Porpane Emissions	Flare Pilot	Flare	Total Propane Emission
PM	9.82E-04	2.74E-02	2.84E-02
PM10	3.44E-03	9.60E-02	9.94E-02
PM2.5	3.44E-03	9.60E-02	9.94E-02
SO <sub>2</sub>	4.74E-03	1.32E-01	1.37E-01
NO <sub>x</sub>	3.04E-02	8.48E-01	8.79E-01
VOC	4.91E-03	1.37E-01	1.42E-01
CO	1.65E-01	4.62E+00	4.78E+00

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	6.80E-02 **see below	5.5	3.70E-01
Potential Emission in tons/yr	8.32E-04	3.33E-03	3.33E-03	2.63E-04	3.04E-02	2.41E-03	0.17

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

\*\*Emission Factors for NOx and CO are taken from AP-42 Table 13.5-1 as it is more representative of flares.

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03	
Potential Emission in tons/yr	9.20E-07	5.26E-07	3.29E-05	7.88E-04	1.49E-06	8.24E-04

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03	
Potential Emission in tons/yr	2.19E-07	4.82E-07	6.13E-07	1.66E-07	9.20E-07	2.40E-06

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

<b>Total HAPs</b>	<b>8.27E-04</b>
<b>Worst HAP</b>	<b>7.88E-04</b>

Flare Emissions	(tons/yr)
PM	0.03
PM10	0.10
PM2.5	0.10
SO <sub>2</sub>	0.14
NO <sub>x</sub>	0.91
VOC	0.14
CO	4.95
Lead	2.19E-07
Hexane	7.88E-04
Total HAP	8.27E-04

**Appendix A: Emission Calculations**  
**VOC/HAP Emissions from Cavern 2**

**Company Name:** Enterprise Terminals & Storage, LLC  
**Address City IN Zip:** 10197 E. County Road 1000 North, Seymour, IN 47274  
**Permit No.:** F071-34698-00007  
**SPR No.:** 071-35950-00007  
**Reviewer:** Julie Alexander

<b>Total Annual Emissions</b>	<b>Uncontrolled (tons/yr)</b>	<b>Controlled (tons/yr)</b>
PM	0.03	0.03
PM10	0.10	0.10
PM2.5	0.10	0.10
SO <sub>2</sub>	0.14	0.14
NO <sub>x</sub>	0.91	0.91
VOC	562.65	11.25
CO	4.95	4.95
Lead	0.00	0.00
Hexane	0.00	0.00
Total HAP	0.69	0.01

Emission (tpy) = Vented Gas Emission Rate (tpy) + Natural Gas Combustion Emission Rate (tpy)



### Appendix A: Emission Calculations VOC/HAP Emissions from Cavern 3

**Company Name:** Enterprise Terminals & Storage, LLC  
**Address City IN Zip:** 10197 E. County Road 1000 North, Seymour, IN 47274  
**Permit No.:** F071-34698-00007  
**SPR No.:** 071-35950-00007  
**Reviewer:** Julie Alexander

#### OPERATING PARAMETERS

Vent Gas Material	Propane Stream
Venting Event Material Volume (liquid)	666 barrels (bbl)
Annual Venting Events	18 events/yr

Notes:

Potential to emit based on propane cavern specifications from a similar cavern. Unidentified  
 Venting volume conservatively based on the maximum historical venting volume per batch  
 Assumes venting will occur for each batch shipment during the winter months, i.e., one sh

#### DIMENSIONAL ANALYSIS

Mass Conversion	0.4536 kg/lb
Mass Conversion	2,000 lb/ton
Mass Conversion	7,000 gr/lb
Time Conversion	8,760 hr/yr
Heat Input Capacity	1,000,000 Btu/MMBtu
Volume Conversion	1,000,000 scf/MMscf
Volume Conversion	1,000 gal/10 <sup>3</sup> gal
Volume Conversion	42 gal/bbl
Default Natural Gas HHV	1,020 MMBtu/MMscf

NIST SP1038

NIST SP1038

NIST SP1038

AP-42, Section 1.4, footnote "a" to Table 1.4-1

#### VENTED GAS STREAM CALCULATIONS

Flare Destruction Efficiency	0.98 unitless
Propane Heating Value	90,962 Btu/gal
Propane Heating Value	21,499 Btu/lb
Propane Heating Value	2,517 MMBtu/MMscf
Propane Density	4.19 lb/gal
Maximum Hourly Flow Rate	9,949 lb/hr
Maximum Annual Flow Rate (Liquid)	2.4 10 <sup>3</sup> gal/hr
Maximum Annual Flow Rate (Liquid)	503,496 gal/yr
Maximum Annual Flow Rate (Liquid)	503 10 <sup>3</sup> gal/yr
Maximum Annual Flow Rate (Liquid)	2,112,015 lb/yr
Heat Input Capacity (Propane)	45,799 MMBtu/yr

Established from vendor supplied data for flaring propane and the maximum recommended

Physical Properties of Hydrocarbons, API Research Project 44, Rev. 1981, Fig. 16-1, pag

Physical Properties of Hydrocarbons, API Research Project 44, Rev. 1981, Fig. 16-1, pag

Physical Properties of Hydrocarbons, API Research Project 44, Rev. 1981, Fig. 16-1, pag

Propane density

Flare maximum recommended feed rate for propane

= Maximum Hourly Flow Rate (lb/hr) / Propane Density (lb/gal) / 1,000 (gal/10<sup>3</sup> gal)

= Venting Event Material Volume (bbl) x Annual Venting Events (events/yr) x 42 (gal/bbl)

= Maximum Annual Flow Rate (gal/yr) / 1,000 (gal/10<sup>3</sup> gal)

= Maximum Annual Flow Rate (gal/yr) x Propane Density (lb/gal)

= Maximum Annual Flow Rate (gal/yr) x Propane Heating Value (Btu/gal) / 1,000,000 (Btu

#### PILOT LIGHT/PURGE GAS/SUPPLEMENTAL FUEL PROPERTIES

Pilot Natural Gas Use	100 scf/hr
Pilot Natural Gas Use	0.876 MMscf/yr
Pilot Propane Use	0.876 MMscf/yr
Pilot Propane Use	894 MMBtu/yr
Pilot Propane Use	9.82 10 <sup>3</sup> gal/yr
Flare Natural Gas Heat Input Capacity	1.00E-04 MMscf/hr
Flare Natural Gas Heat Input Capacity	894 MMBtu/yr

= Pilot Natural Gas Use (MMscf/hr) x 8,760 (hr/yr)

Natural gas equivalent, used for estimating pilot propane HAP emissions

Equivalent to heat input when using natural gas

= Pilot Propane Use (MMBtu/yr) x 1,000,000 (Btu/MMBtu) / Propane heating value (Btu/g)

= Flare Natural Gas Use (scf/hr) / 1,000,000 (scf/MMscf)

= Flare Natural Gas Use (MMscf/yr) x Natural Gas HHV (MMBtu/MMscf)

#### VENTED MATERIAL COMPOSITION

VOC Weight Percent	97.8% unitless
Total HAP Weight Percent	1.20E-03 unitless

Lab analysis for similar source

Lab analysis for similar source

#### GAS PROPERTIES (STANDARD CONDITIONS)

Reference Temperature	77 °F
Reference Temperature	537 °R
Reference Pressure	14.7 psia
Gas Law Constant	10.732 ft <sup>3</sup> -psi/R-lbmol
Molar Volume (Standard Conditions)	392 scf/lbmol
Vent Gas Molecular Weight	43.89 lb/lbmol
Vent Gas Density	0.11 lb vent gas/scf

Standard temperature

Conversion from Fahrenheit to Rankine

Atmospheric pressure

Gas law constant

= Gas Law Constant (ft<sup>3</sup>-psi/R-lbmol) x Reference Temperature (°R) / Reference Pressure

Lab analysis for similar source

= Vent Gas Molecular Weight (lb/lbmol) / Molar Volume (scf/lbmol)

#### POLLUTANT PROPERTIES

Sulfur Content	123 ppm
Sulfur Content	0.86 gr/lb vent gas
Sulfur Content	9.6 gr/100 scf

Product specifications

= Sulfur Content (ppm) / 1,000,000 [ppm / (lb/lb vent gas)] x 7,000 (gr/lb)

= Sulfur Content (gr/lb vent gas) x Vent Gas Density (lb vent gas/scf) x 100 scf

#### EMISSION FACTORS (PROPANE)

PM	0.2 lb/10 <sup>3</sup> gallons
PM10	0.7 lb/10 <sup>3</sup> gallons
PM2.5	0.7 lb/10 <sup>3</sup> gallons
SO <sub>2</sub>	1.0 lb/10 <sup>3</sup> gallons
VOC	1.0 lb/10 <sup>3</sup> gallons
CO	0.37 lb/MMBtu
NO <sub>x</sub>	0.068 lb/MMBtu

AP-42, Section 1.5, Table 1.5-1 for LPG (propane) combustion

AP-42, Section 1.5, Table 1.5-1 for LPG (propane) combustion

AP-42, Section 1.5, Table 1.5-1 for LPG (propane) combustion

AP-42, Section 1.5, Table 1.5-1 for LPG (propane) combustion; SO<sub>2</sub> emissions (lb/10<sup>3</sup> gal)

AP-42, Section 1.5, Table 1.5-1 for LPG (propane) combustion

AP-42 Section 13.5, Table 13.5-1 (9/91)

AP-42 Section 13.5, Table 13.5-1 (9/91)

#### Vented Gas Emissions

	Uncontrolled (tons/yr)	Controlled (tons/yr)
PM	-	-
PM10	-	-

**Appendix A: Emission Calculations**  
**VOC/HAP Emissions from Cavern 3**

**Company Name:** Enterprise Terminals & Storage, LLC  
**Address City IN Zip:** 10197 E. County Road 1000 North, Seymour, IN 47274  
**Permit No.:** F071-34698-00007  
**SPR No.:** 071-35950-00007  
**Reviewer:** Julie Alexander

PM2.5	-	-
SO <sub>2</sub>	-	-
NO <sub>x</sub>	-	-
VOC	1,032.67	20.65
CO	-	-
<b>Total HAP</b>	<b>1.27</b>	<b>0.03</b>

<sup>1</sup> NO<sub>x</sub> and CO emissions (tpy) = Heat Input Capacity from Vent Gas (MMBtu/yr) x Vent Gas Combustion Pollutant EF (lb/MMBtu) / 2,000 (lb/ton)

PM/PM<sub>10</sub>/PM<sub>2.5</sub> and SO<sub>2</sub> Emissions (tpy) = Maximum Annual Vent Gas Flow Rate (10<sup>3</sup> gal/yr) x Pollutant EF (lb/10<sup>3</sup> gal) / 2,000 (lb/ton)

Controlled VOC Emissions (tpy) = Maximum Annual Vent Gas Flow Rate (lb/yr) x Pollutant Weight Percent (%) x [1 - Flare Destruction Efficiency (%)] / 2,000 (lb/ton)

Controlled HAP Emissions (tpy) = [Heat Input Capacity from Vent Gas (MMBtu/yr) x Total HAP Combustion EF (lb/MMBtu) x Flare Destruction Efficiency (%) + Maximum Ar Pollutant Weight Percent (%) x (1 - Flare Destruction Efficiency (%))] / 2,000 (lb/ton)

**Flare Pilot Propane Emissions**

Flare Propane Emissions	Flare Pilot	Flare	Total Propane Emission
PM	9.82E-04	5.03E-02	5.13E-02
PM10	3.44E-03	1.76E-01	1.80E-01
PM2.5	3.44E-03	1.76E-01	1.80E-01
SO <sub>2</sub>	4.74E-03	2.43E-01	2.47E-01
NO <sub>x</sub>	3.04E-02	1.56E+00	1.59E+00
VOC	4.91E-03	2.52E-01	2.57E-01
CO	1.65E-01	8.47E+00	8.64E+00

**Flare Pilot Natural Gas Emissions**

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
	1.9	7.6	7.6	0.6	6.80E-02 **see below	5.5	3.70E-01
Potential Emission in tons/yr	8.32E-04	3.33E-03	3.33E-03	2.63E-04	3.04E-02	2.41E-03	0.17

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

\*\*Emission Factors for NO<sub>x</sub> and CO are taken from AP-42 Table 13.5-1 as it is more representative of flares.

Emission Factor in lb/MMcf	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03	
Potential Emission in tons/yr	9.20E-07	5.26E-07	3.29E-05	7.88E-04	1.49E-06	8.24E-04

Emission Factor in lb/MMcf	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03	
Potential Emission in tons/yr	2.19E-07	4.82E-07	6.13E-07	1.66E-07	9.20E-07	2.40E-06
						<b>Total HAPs</b>
						<b>Worst HAP</b>
						<b>8.27E-04</b>
						<b>7.88E-04</b>

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Flare Emissions	(tons/yr)
PM	0.05
PM10	0.18
PM2.5	0.18
SO <sub>2</sub>	0.25

**Appendix A: Emission Calculations**  
**VOC/HAP Emissions from Cavern 3**

**Company Name:** Enterprise Terminals & Storage, LLC  
**Address City IN Zip:** 10197 E. County Road 1000 North, Seymour, IN 47274  
**Permit No.:** F071-34698-00007  
**SPR No.:** 071-35950-00007  
**Reviewer:** Julie Alexander

NO <sub>x</sub>	1.62
VOC	0.26
CO	8.80
Lead	2.19E-07
Hexane	7.88E-04
Total HAP	8.27E-04

Total Annual Emissions	Uncontrolled (tons/yr)	Controlled (tons/yr)
PM	0.05	0.05
PM10	0.18	0.18
PM2.5	0.18	0.18
SO <sub>2</sub>	0.25	0.25
NO <sub>x</sub>	1.62	1.62
VOC	1,032.93	20.66
CO	8.80	8.80
Lead	0.00	0.00
Hexane	0.00	0.00
Total HAP	1.27	0.03

Emission (tpy) = Vented Gas Emission Rate (tpy) + Natural Gas Combustion Emission Rate (tpy)

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

**Company Name:** Enterprise Terminals & Storage, LLC  
**Address City IN Zip:** 10197 E. County Road 1000 North, Seymour, IN 47274  
**Permit No.:** F071-34698-00007  
**SPR No.:** 071-35950-00007  
**Reviewer:** Julie Alexander

Tank Number	Product Stored	Losses (Tons per Year)						Total VOC (Tons/yr)
		Working	Breathing	Withdrawal	Rim Seal	Deck Fitting	Deck Seam	
3001	Jet A, Diesel and similar low VP	1.55	0.26	--	--	--	--	1.81
3002	Jet A, Diesel and similar low VP	1.17	0.20	--	--	--	--	1.37
3003	Jet A, Diesel and similar low VP	1.17	0.20	--	--	--	--	1.37
3004	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.18	0.35	3.38	0	3.92
3005	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.20	0.32	0.32	0	0.84
3006	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.20	0.32	0.32	0	0.84
3007	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.17	0.28	0.31	0	0.77
3008	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.17	0.28	0.31	0	0.77
3009	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.43	0.62	6.39	0	7.44
3010	Jet A, Diesel and low VP	6.48	0.94	--	--	--	--	7.41
3011	Jet A, Diesel and low VP	1.74	0.29	--	--	--	--	2.02
3012	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.13	0.21	0.30	0	0.64
3013	Jet A, Diesel and low VP	4.85	0.79	--	--	--	--	5.64
3014	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.17	0.28	0.37	0	0.83
3015	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.20	0.32	0.37	0	0.89
3016	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.21	1.19	0.38	0	1.78
3017	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.17	0.28	0.31	0	0.77
3018	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.65	0.11	1.37	0	2.13
3061	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.03	0.22	1.20	0	1.45
3062	Blends, Transmix, Jet A, Diesel and low VP	6.31	2.86	--	--	--	--	9.18
3063	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.04	0.35	0.34	0	0.74
<b>Total</b>		<b>23.27</b>	<b>5.54</b>	<b>2.95</b>	<b>5.16</b>	<b>15.69</b>	<b>0</b>	<b>52.60</b>

**Notes:**

All storage tank emissions estimated using US EPA's Tanks 4.09b software program and are based on the estimated maximum annual throughput for each tank.

All annual tank throughputs (except tanks 3010, 3011 and 3062) are based on 73 turnovers (once every 5 days).

Annual throughput of the tanks 3010 and 3011 are based on 100 turnovers.

Annual throughput of the tank 3062 is based on 12 turnovers.

**Appendix A: Emission Calculations  
Tank HAP Emissions**

**Company Name:** Enterprise Terminals & Storage, LLC  
**Address City IN Zip:** 10197 E. County Road 1000 North, Seymour, IN 47274  
**Permit No.:** F071-34698-00007  
**SPR No.:** 071-35950-00007  
**Reviewer:** Julie Alexander

Tank Number	Product Stored	Losses (Tons per Year)						Total VOC
		Working	Breathing	Withdrawal	Rim Seal	Deck Fitting	Deck Seam	Tons/yr
3001	Jet A, Diesel and similar low VP	1.55	0.26	--	--	--	--	1.81
3002	Jet A, Diesel and similar low VP	1.17	0.20	--	--	--	--	1.37
3003	Jet A, Diesel and similar low VP	1.17	0.20	--	--	--	--	1.37
3004	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.18	0.35	3.38	0	3.92
3005	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.20	0.32	0.32	0	0.84
3006	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.20	0.32	0.32	0	0.84
3007	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.17	0.28	0.31	0	0.77
3008	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.17	0.28	0.31	0	0.77
3009	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.43	0.62	6.39	0	7.44
3010	Jet A, Diesel and low VP	6.48	0.94	--	--	--	--	7.41
3011	Jet A, Diesel and low VP	1.74	0.29	--	--	--	--	2.02
3012	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.13	0.21	0.30	0	0.64
3013	Jet A, Diesel and low VP	4.85	0.79	--	--	--	--	5.64
3014	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.17	0.28	0.37	0	0.83
3015	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.20	0.32	0.37	0	0.89
3016	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.21	1.19	0.38	0	1.78
3017	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.17	0.28	0.31	0	0.77
3018	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.65	0.11	1.37	0	2.13
3061	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.03	0.22	1.20	0	1.45
3062	Blends, Transmix, Jet A, Diesel and low VP	6.31	2.86	--	--	--	--	9.18
3063	Nat. Gasln, Gasln, Jet A, Diesel and low VP	--	--	0.04	0.35	0.34	0	0.74
<b>Total VOC</b>		<b>23.27</b>	<b>5.54</b>	<b>2.95</b>	<b>5.16</b>	<b>15.69</b>	<b>0</b>	<b>52.60</b>

Product	Vapor Weight Percent				
	Benzene	Toluene	Ethyl-Benzene	Xylenes	Hexane
Diesel/Jet A/Transmix	0.17	0.10	0.02	0.04	0.09
Gasoline	0.01	0.01	0.00	0.01	0.02

Tank Number	Product	VOC Emissions (tons/yr)	HAP Emissions (tons/yr)					Total
			Benzene	Toluene	Ethyl-Benzene	Xylenes	Hexane	
3001	Jet A, Diesel and similar low VP	1.81	0.30	0.18	0.04	0.08	0.17	0.76
3002	Jet A, Diesel and similar low VP	1.37	0.23	0.13	0.03	0.06	0.13	0.58
3003	Jet A, Diesel and similar low VP	1.37	0.23	0.14	0.03	0.06	0.13	0.58
3004	Nat. Gasln, Gasln, Jet A, Diesel and low VP	3.92	0.04	0.05	3.92E-03	0.02	0.06	0.17
3005	Nat. Gasln, Gasln, Jet A, Diesel and low VP	0.84	7.55E-03	0.01	8.39E-04	4.19E-03	0.01	0.04
3006	Nat. Gasln, Gasln, Jet A, Diesel and low VP	0.84	7.58E-03	0.01	8.42E-04	4.21E-03	0.01	0.04
3007	Nat. Gasln, Gasln, Jet A, Diesel and low VP	0.77	6.92E-03	9.99E-03	7.68E-04	3.84E-03	0.01	0.03
3008	Nat. Gasln, Gasln, Jet A, Diesel and low VP	0.77	6.92E-03	9.99E-03	7.68E-04	3.84E-03	0.01	0.03
3009	Nat. Gasln, Gasln, Jet A, Diesel and low VP	7.44	0.07	0.10	7.44E-03	0.04	0.12	0.33
3010	Jet A, Diesel and low VP	7.41	1.24	0.73	0.14	0.33	0.68	3.12
3011	Jet A, Diesel and low VP	2.02	0.34	0.20	0.04	0.09	0.19	0.85
3012	Nat. Gasln, Gasln, Jet A, Diesel and low VP	0.64	5.73E-03	8.27E-03	6.36E-04	3.18E-03	0.01	0.03
3013	Jet A, Diesel and low VP	5.64	0.94	0.55	0.11	0.25	0.52	2.37
3014	Nat. Gasln, Gasln, Jet A, Diesel and low VP	0.83	7.45E-03	0.01	8.28E-04	4.14E-03	0.01	0.04
3015	Nat. Gasln, Gasln, Jet A, Diesel and low VP	0.89	8.02E-03	0.01	8.91E-04	4.46E-03	0.01	0.04
3016	Nat. Gasln, Gasln, Jet A, Diesel and low VP	1.78	0.02	0.02	1.78E-03	8.88E-03	0.03	0.08
3017	Nat. Gasln, Gasln, Jet A, Diesel and low VP	0.77	6.93E-03	0.01	7.70E-04	3.85E-03	0.01	0.03
3018	Nat. Gasln, Gasln, Jet A, Diesel and low VP	2.13	0.02	0.03	2.13E-03	0.01	0.03	0.09
3061	Nat. Gasln, Gasln, Jet A, Diesel and low VP	1.45	0.24	0.14	0.03	0.06	0.13	0.61
3062	Blends, Transmix, Jet A, Diesel and low VP	9.18	1.53	0.90	0.18	0.41	0.84	3.86
3063	Nat. Gasln, Gasln, Jet A, Diesel and low VP	0.74	6.64E-03	9.58E-03	7.37E-04	3.69E-03	0.01	0.03
Total		<b>52.60</b>	<b>5.25</b>	<b>3.27</b>	<b>0.61</b>	<b>1.46</b>	<b>3.13</b>	<b>13.72</b>

Notes:  
All storage tank emissions estimated using USEPA's Tanks 4.09b software program and are based on the estimated maximum annual throughput for each tank.  
To determine the worst case emissions for Diesel and Jet A service, the highest vapor wt% for each service was used to determine the emissions.  
The higher vapor wt% for all HAPs was higher for Diesel than Jet A except Hexane where the Jet A wt% was used.  
Transmix is a blend of all fuels, but the highest vapor wt% for Diesel, Jet A or gasoline was used.

**Appendix A: Emission Calculations**  
**Roof Landing Emission: VOCs**

**Company Name:** Enterprise Terminals & Storage, LLC  
**Address City IN Zip:** 10197 E. County Road 1000 North, Seymour, IN 47274  
**Permit No.:** F071-34698-00007  
**SPR No.:** 071-35950-00007  
**Reviewer:** Julie Alexander

Tank ID	Product Stored	In Service (Date)	Roof Configuration (CRIF/DRIF)*	Floor Configuration (CMBD/Drain Dry/CMSD)**	Low Leg Setting	Roof Landed for Reason	Tank Diameter (ft)	Roof Landing Emission (ton/year)***
3004	Gasoline	1959	CRIF	Drain Dry	2'-10"	RVP seasonal	125	0.75
3005	Gasoline	1959	DRIF	Drain Dry	1'-3"	RVP seasonal	114	0.48
3006	Gasoline	1959	DRIF	Drain Dry	1'-3"	RVP seasonal	114	0.48
3007	Gas/Raff	1959	DRIF	Drain Dry	1'-3"	RVP seasonal	100	0.37
3008	Gasoline	1959	DRIF	Drain Dry	1'-3"	RVP seasonal	100	0.37
3009	Gasoline	1961	CRIF	CMBD	4'-2"	RVP seasonal	220	2.78
3012	Gasoline	1961	DRIF	Drain Dry	2'-6"	RVP seasonal	74-4"	0.25
3014	Gasoline	1960	DRIF	CMSD	4'-1"	RVP seasonal	100	0.7
3015	Gasoline	1960	DRIF	CMSD	4'-1"	RVP seasonal	114	0.9
3016	Gasoline	1960	DRIF	CMSD	4'-1"	RVP seasonal	114	0.9
3017	Gasoline	1960	DRIF	CMSD	4'-1"	RVP seasonal	100	0.7
3018	Gas/Raff	1980	CRIF	Drain Dry	3'-6"	RVP seasonal	62-6"	0.21
<b>TOTAL</b>								<b>8.89</b>

\* CRIF = Coned Roof Internal Floater; DRIF = Dome Roof Internal Floater

\*\* CMBD = Coned Middle Bottom Drain (equal to Drain Dry); CMSD = Coned Middle Side Drain

HAPs are shown as part of Tank HAP Emissions.

**Methodology:** (using Tank ID 3012 as an example)

<b>L<sub>SL</sub> Methodology:</b>		
AP-42 Eq. 2-10	$L_{TL} = L_{SL} + L_{FL}$	
AP-42 Eq. 2-20, 2-21	$L_{SL} = L_C = 42 C_S W_i (area) \quad Area = \pi D^2 / 4$	
<b>C<sub>S</sub></b>	0.15 bbl/1000 ft <sup>3</sup>	Table 7.1-10
<b>W<sub>i</sub></b>	5.6 lb/gal	API: Table 2
<b>D</b>	74.33 ft	
Therefore $L_{SL} =$	153.09 lbs	

$L_{SFmax}$  must be less than or equal to the following:

AP-42 Eq. 2-24  $L_{SL} \leq 0.60 (PV_v / RT) M_v$

Since  $L_{SL} < 393.3$  lbs, the relationship is satisfied.

<b>S****</b>	0.15	filling saturation factor
<b>L<sub>FL</sub></b>	646.03	lbs
<b>L<sub>FL</sub> * 1ton/2000lbs</b>	0.32	tons

\*\*\*\*Value from API document Table 1

		<b>Unit</b>
<b>T<sub>max</sub>*</b>	527.725	deg R**
<b>T<sub>min</sub>*</b>	510.475	deg R**
<b>T</b>	519.1	deg R**
<b>P</b>	5.1	psia
<b>h<sub>v</sub></b>	2.5	ft
<b>V<sub>v</sub></b>	10848.21	ft <sup>3</sup>
<b>R</b>	10.731	[psia ft <sup>3</sup> ]/[(lb-mol R)]
<b>M<sub>v</sub></b>	66	lb/lb mol

\*Values from AP 42 Table 7.1-7 page 7.1-56

\*\*deg R = deg F + 460

Met. Data for Indianapolis, Indiana

Standing Idle - clingage losses (no additional standing idle loss after first day)

<b>V<sub>v</sub> Methodology:</b>	
AP-42 Eq. 1-3	$V_v = (\pi D^2 / 4) H_v o$
<b>H<sub>vo</sub></b>	2.5 ft
Therefore $V_v =$	10848.21 ft <sup>3</sup>

## Appendix A: Emission Calculations

## Roof Landing Emission: VOCs

Company Name: Enterprise Terminals & Storage, LLC  
 Address City IN Zip: 10197 E. County Road 1000 North, Seymour, IN 47274  
 Permit No.: F071-34698-00007  
 SPR No.: 071-35950-00007  
 Reviewer: Julie Alexander

Tank	Product	In	Roof	Floor	Low Leg	Roof Landed	Tank	Roof
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TOTAL Roof Landing Emissions for Unit		
Total	251.42	lbs
Total * 1ton/2000lbs	0.13	tons
Number of events	2	per year
<b>Total</b>	<b>0.25</b>	<b>tons/year</b>

**T Methodology:**

AP-42 Eq. 1-27  $T = (T_{max} + T_{min}) / 2$

**L<sub>FL</sub> Methodology:**

AP-42 Eq. 2-26  $L_{FL} = (PV_v / RT) M_v S$

**Total Loss Methodology:**

AP-42 Eq. 2-10  $Total = L_{FL} + L_{SL}$

2000 lbs = 1 ton

Total = (LFL+LSL)\*2 per year

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**

**Company Name:** Enterprise Terminals & Storage, LLC  
**Address City IN Zip:** 10197 E. County Road 1000 North, Seymour, IN 47274  
**Permit No.:** F071-34698-00007  
**SPR No.:** 071-35950-00007  
**Reviewer:** Julie Alexander

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
0.7	1020	6.0

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	5.71E-03	0.023	0.023	1.80E-03	0.301	0.017	0.252

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.10E-03	1.20E-03	7.5E-02	1.8E+00	3.40E-03
Potential Emission in tons/yr	6.31E-06	3.61E-06	2.25E-04	5.41E-03	1.02E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03
Potential Emission in tons/yr	1.50E-06	3.31E-06	4.21E-06	1.14E-06	6.31E-06

**TOTAL** **5.67E-03**

#### Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.



**Appendix A: Emission Calculations**  
**Liquefied Petroleum Gas Combustion**  
**(Heat input capacity: > 0.3 MMBtu/hr and < 10 MMBtu/hr)**

**Company Name:** Enterprise Terminals & Storage, LLC  
**Address City IN Zip:** 10197 E. County Road 1000 North, Seymour, IN 47274  
**Permit No.:** F071-34698-00007  
**SPR No.:** 071-35950-00007  
**Reviewer:** Julie Alexander

Heat Input Capacity  
MMBtu/hr

7.80

Potential Throughput  
kgals/year

726.89

SO<sub>2</sub> Emission factor = 0.09 x S

S = Weight % Sulfur = 9.60

**Heaters**

Emission Factor in lb/kgal	Pollutant						
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
	0.2	0.8	0.8	0.9 (0.09S)	15.0	1.1	8.4
Potential Emission in tons/yr	0.07	0.29	0.29	0.31	5.45	0.40	3.05

**Methodology**

1 gallon of LPG has a heating value of 94,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.094 MMBtu

Emission Factors are from AP42, Table 1.5-1 (SCC #1-03-010-01)

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

There are no HAPs formed during liquefied petroleum gas combustion.



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

July 30, 2015

Mr. Shiver Nolan  
Enterprise Terminals & Storage, LLC  
P. O. Box 43247  
Houston, Texas 77210

Re: Public Notice  
Enterprise Terminals & Storage, LLC  
Permit Level: FESOP – Significant Permit Revision  
Minor PSD  
Permit Number: 071-35950-00007

Dear Mr. Nolan:

Enclosed is a copy of your draft FESOP – Significant Permit Revision Minor PSD, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that The Tribune in Seymour, Indiana publish the abbreviated version of the public notice no later than July 31, 2015. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Jackson County Public Library, 303 West Second Street in Seymour, 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.

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 Julie Alexander, 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 3-1782 or dial (317) 233-1782.

Sincerely,

*Vicki Biddle*

Vicki Biddle  
Permits Branch  
Office of Air Quality

Enclosures

PN Applicant Cover letter-2014. Dot4/10/14



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Governor

**Thomas W. Easterly**  
Commissioner

### ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

July 30, 2015

The Tribune  
P.O. Box 447  
Seymour, Indiana 47274

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Enterprise Terminals & Storage, LLC, Jackson County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than July 31, 2015.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

**To ensure proper payment, please reference account # 100174737.**

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vicki Biddle at 800-451-6027 and ask for extension 3-6867 or dial 317-233-6867.

Sincerely,

*Vicki Biddle*

Vicki Biddle  
Permit Branch  
Office of Air Quality

Permit Level: FESOP – Significant Permit Revision Minor PSD  
Permit Number: 071-35950-00007

Enclosure

PN Newspaper.dot 6/13/2013



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Thomas W. Easterly  
Commissioner

July 30, 2015

To: Jackson County 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**

**Applicant Name: Enterprise Terminals & Storage, LLC**  
**Permit Number: 071-35950-00007**

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 6/13/2013



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Michael R. Pence  
Governor

Thomas W. Easterly  
Commissioner

### Notice of Public Comment

**July 30, 2015**

**Enterprise Terminals & Storage, LLC**

**071-35950-00007**

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](mailto: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 6/13/13



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**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

### AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

July 30, 2015

A 30-day public comment period has been initiated for:

**Permit Number:** 071-35950-00007  
**Applicant Name:** Enterprise Terminals & Storage, LLC  
**Location:** Seymour, Jackson County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

<http://www.in.gov/ai/appfiles/idem-caats/>


Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management  
Office of Air Quality, Permits Branch  
100 North Senate Avenue  
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at [chammack@idem.IN.gov](mailto:chammack@idem.IN.gov) or (317) 233-2414.

Affected States Notification.dot 3/13/2013

# Mail Code 61-53

IDEM Staff	VBIDDLE 7/30/2015 Enterprise Terminals & Storage LLC 071-35950-00007 DRAFT			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling 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		Shiver Nolan Enterprise Terminals & Storage LLC PO Box 4324 Houston TX 72210-4324 (Source CAATS)									
2		Jeff Gruber VP - Liquid Pipeline Productions Enterprise Terminals & Storage LLC PO Box 4324 Houston TX 72210-4324 (RO CAATS)									
3		Jackson County Commissioner Jackson County Courthouse Brownstown IN 47220 (Local Official)									
4		Mr. Tome Earnhart 3960 N. CR 300 W. North Vernon IN 47265 (Affected Party)									
5		Seymour City Council and Mayors Office 301 North Chestnut Street Seymour IN 47274 (Local Official)									
6		Jackson County Health Department 801 West 2nd Street Seymour IN 47274-2711 (Health Department)									
7		Jackson Co Public Library 303 W 2nd Street Seymour IN 47274-2184 (Library)									
8											
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Total number of pieces Listed by Sender  <b>7</b>	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, S913, and 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.
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