

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OFFICE OF AIR MANAGEMENT
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION

Shell Oil Products Company - Zionsville Plant
5405 West 96th Street
Indianapolis, Indiana 46268

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

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 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-5476-00077	
Issued by: Dr. Robert F. Holm, Administrator Environmental Resource Management Division	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Environmental Resources Management Division (ERMD), and presented in the permit application.

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

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

Responsible Official: T. J. Rizzoli
Source Address: 5405 West 96th Street, Indianapolis, Indiana 46268
Mailing Address: P.O. Box 7, Zionsville, Indiana 46077
SIC Code: 5171
County Location: Marion
County Status: Attainment for PM-10, O₃, CO, SO₂ and NO₂ ;
Nonattainment for TSP
Source Status: Minor Source, FESOP Program
Minor Source, PSD and Emission Offset

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:
One storage and distribution station for petroleum products consisting of:

- (a) One (1) truck loading rack equipped with a Vapor Recovery Collection System, The loading rack has a maximum fuel dispensing capacity of 198,000 gallons per hour. The VOC emissions are controlled by a carbon adsorber, identified as CD1, which exhausts out one stack, identified as Stack I.D. #002. The loading rack was constructed in 1938.
- (b) One (1) internal floating roof gasoline storage tank, identified as Z-11, with a maximum capacity of 1,499,400 gallons. Tank was constructed in 1938.
- (c) One (1) internal floating roof gasoline or Avgas storage tank, identified as Z-20, with a maximum capacity of 537,600 gallons. Tank was constructed in 1938.
- (d) One (1) internal floating roof gasoline storage tank, identified as Z-23, with a maximum capacity of 1,478,400 gallons. Tank was constructed in 1938.
- (e) One (1) internal floating roof gasoline storage tank, identified as Z-60, with a maximum capacity of 3,078,600 gallons. Tank was constructed in 1955.
- (f) One (1) internal floating roof gasoline storage tank, identified as Z-84, with a maximum capacity of 3,935,400 gallons. Tank was constructed in 1955.
- (g) One (1) fixed roof Jet A storage tank, identified as Z-21, with a maximum capacity of 571,200 gallons. Tank was constructed in 1938.
- (h) One (1) fixed roof Jet A storage tank, identified as Z-22, with a maximum capacity of 592,200 gallons. Tank was constructed in 1938.
- (i) One (1) fixed roof Jet A storage tank, identified as Z-61, with a maximum capacity of 4,485,600 gallons. Tank was constructed in 1955.
- (j) One (1) fixed roof diesel fuel storage tank, identified as Z-01, with a maximum capacity of

16,800 gallons. Tank was constructed in 1938.

- (k) One (1) fixed roof diesel fuel storage tank, identified as Z-82, with a maximum capacity of 1,470,000 gallons. Tank was constructed in 1948.
- (l) One (1) fixed roof diesel fuel storage tank, identified as Z-83, with a maximum capacity of 4,380,600 gallons. Tank was constructed in 1950.

A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(l)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (d) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (e) Paved and unpaved roads and parking lots with public access.
- (f) Other categories with emissions below insignificant thresholds

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

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

A.5 Prior Permit Conditions Superseded [326 IAC 2]

This permit supersedes the operating conditions of all construction and operating permits issued to this stationary source under 326 IAC 2 prior to the effective date of this FESOP.

SECTION B GENERAL CONDITIONS

B.1 General Requirements [IC 13-15] [IC 13-17]

The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.

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

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

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and ERMD.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
- (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by ERMD .

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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

B.6 Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]

- (a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
- (b) Indiana 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.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) The Permittee shall furnish to IDEM, OAM, and ERMD within a reasonable time, any information that IDEM, OAM, and ERMD 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and ERMD copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to the U.S. EPA and IDEM, OAM, and ERMD along with a claim of confidentiality.

Such confidentiality claims shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM and ERMD).

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM and ERMD 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.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) 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.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) This certification shall be submitted on the attached Certification Form.

- (c) A responsible official is defined at 326 IAC 2-7-1(33).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually certify that this source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) This annual compliance certification report required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, and ERMD on or before the date it is due. [326 IAC 2-5-3]
- (c) The annual compliance certification report shall include the following:
- (1) The 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, IDEM, OAM, and ERMD may require to determine the compliance status of the source.
- (d) The Permittee shall also annually certify that this source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall prepare, maintain and implement Preventive Maintenance Plans (PMP) within ninety (90) days after the issuance of this permit, including the following information on each:
- (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;

- (3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;
 - (4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
 - (5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- (b) PMPs shall be submitted to IDEM, OAM and ERMD, upon request and shall be subject to review and approval by IDEM, OAM and ERMD.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes 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, OAM and ERMD, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

ERMD

Telephone No.: 317-327-2234
Facsimile No.: 317-327-2274

Failure to notify IDEM, OAM and ERMD, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAM and ERMD, 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, OAM and ERMD, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance 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.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) Written notification shall be submitted on the attached Deviation Occurrence Reporting Form(s) or their substantial equivalent.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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)]

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM and ERMD 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, OAM and ERMD, 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, OAM and ERMD, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM and ERMD, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and ERMD and shall include, at minimum, 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(20).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) Delivered by any method and received and stamped by IDEM, OAM and ERMD, on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM and ERMD upon receiving a timely and complete 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.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

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, OAM and

ERMD takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM and ERMD, any additional information identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- (b) An administrative permit amendment may be made by IDEM, OAM and ERMD, consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM and ERMD takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.

- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.23 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Environmental Resources Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

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

in advance of the change by written notification at least ten (10) days in advance

of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

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

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

- (b) For each such change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (c) Emission Trades [326 IAC 2-8-15(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.24 Construction Permit Requirement [326 IAC 2]

Modification, construction, or reconstruction shall be permitted as required by and in accordance with 326 IAC 2.

B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM and ERMD, 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) Have access to and copy, at reasonable times, any records that must be kept under the

conditions of this permit;

- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and ERMD, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner.
- (c) IDEM, OAM and ERMD shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM and ERMD, consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.
- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM and ERMD or in a time period that is consistent with the payment schedule issued by IDEM, OAM and ERMD.
- (d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-5674 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 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 from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day 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 three hundred sixty-five (365) consecutive day 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 three hundred sixty-five (365) consecutive day period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20). 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.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated. Observations of visible emissions

crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)].

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

- (a) All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B - Preventive Maintenance Plan.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation.
- (c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.

**C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]
[40 CFR 61, Subpart M]**

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector must be Indiana accredited is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-2.1]

All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), utilizing methods approved by the IDEM,OAM.

The test protocol shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis Indiana 46221

no later than thirty-five (35) days before the intended test date.[326 IAC 3-2.1-2(a)]

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

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3). The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days

after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis Indiana 46221

in writing no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

C.10 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) The Permittee shall perform all necessary maintenance and make all necessary and reasonable attempts to keep all required monitoring equipment in proper operating condition at all times.
- (b) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than once per hour until such time as the continuous monitor is back in operation.
- (c) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment.
- (d) Preventive Maintenance Plans of the monitors shall be implemented. In addition, prompt corrective action shall be initiated whenever indicated.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, as appropriate, unless some other method is specified in this permit.

C.12 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

- (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) Written notification is to be 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
 - (3) Waste disposal site.
- (c) The Permittee shall postmark or deliver the notice according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Asbestos
2700 South Belmont Avenue
Indianapolis Indiana 46221

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) **Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Corrective Actions [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

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

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on March 27, 1997.
- (b) If the ERP is disapproved by IDEM, OAM and ERMD, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, IDEM, OAM and ERMD, shall supply such a plan.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM and ERMD, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance is present in more than the threshold quantity that is subject to 40 CFR 68, 40 CFR 68 is an applicable requirement, and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM and ERMD that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM and ERMD that the Risk Management Plan is being properly implemented.

C.15 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data

Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

- (5) The Preventive Maintenance Plan described in Section B, Preventive Maintenance Plan, of this permit.
- (b) For each compliance monitoring condition of this permit appropriate corrective actions, as described in the Preventive Maintenance Plan, shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the corrective actions within the prescribed time contained within the Preventive Maintenance Plan shall constitute a violation of the permit unless taking the corrective action set forth in the Preventive Maintenance Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee may be excused from taking further corrective action for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further corrective actions providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.
- (d) Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit, exceed the level specified in any condition of this permit, appropriate corrective actions shall be taken. A description of these corrective actions shall be submitted to IDEM, OAM and ERMD within thirty (30) days of receipt of the test results. These corrective actions shall be implemented immediately unless notified by IDEM, OAM and ERMD that they are not acceptable. The Permittee shall make every effort to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM and ERMD reserves the right to utilize enforcement activities to resolve the non-compliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Data Support Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis Indiana 46221

- (b) This annual emission statement required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, and ERMD on or before the date it is due. [326 IAC 2-5-3]

C.18 Monitoring Data Availability

- (a) All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) When the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

-
- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM and ERMD representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
- (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to: work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance

2700 South Belmont Avenue
Indianapolis Indiana 46221

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, and ERMD on or before the date it is due. [326 IAC 2-5-3]
- (c) Unless otherwise specified in this permit any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (d) All instances of deviations from any requirements of this permit must be clearly identified in such reports.
- (e) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.
- (f) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

- (a) One (1) truck loading rack equipped with a Vapor Recovery Collection System, The loading rack has a maximum fuel dispensing capacity of 198,000 gallons per hour. The VOC emissions are controlled by a carbon adsorber, identified as CD1, which exhausts out one stack, identified as Stack I.D. #002. The loading rack was constructed in 1938.

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

D.1.1 Volatile Organic Compound Emissions (VOC) [326 IAC 8-4-4][326 IAC 2-7][40 CFR Part 63.420]

- (a) All of the loading racks shall be equipped with a vapor collection system designed to collect the organic compound liquids or vapors displaced from tank trucks during loading of gasoline. The VOC emissions collected shall be controlled using a carbon adsorber. The VOC emissions at the outlet of the carbon adsorber shall not exceed 15 milligrams per liter of gasoline dispensed. Pursuant to 326 IAC 1-2-32, the term gasoline is defined as any petroleum distillate having a Reid vapor pressure of 27.6 kilo Pascals (4 psi) or greater. This limitation satisfies the requirements of 326 IAC 8-4-4 (a)(1).
- (b) The permittee shall provide a means to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
- (c) All loading and vapor lines shall be equipped with fittings which make vapor tight connections, and which will be closed upon disconnection.
- (d) The throughput of gasoline and aviation gas dispensed at the loading rack shall not equal or exceed 528,000,000 gallons per 365 day period, rolled on a daily basis. The throughput of Diesel fuel and Jet A dispensed at the loading rack shall not equal or exceed 260,610,000 gallons per 365 day period, rolled on a daily basis. These throughput limits are equivalent to a VOC emission rate of 67 tons per 365 day period. This conditions will satisfy the requirement to restrict VOC and HAP emissions below the Major Source Thresholds as defined in 326 IAC 2-7-1(21) such that 326 IAC 2-7 (Part 70 Operating Permit Regulation) and 40 CFR Part 63.420 (Gasoline Distribution MACT Regulation) will not apply.
- (e) Loading of petroleum products into tank trucks shall be restricted to the use of submerged fill.

D.1.2 Leaks from transports and vapor collection systems [326 IAC 8-4-9]

- a) The permittee shall not allow any gasoline transport to be filled or emptied unless the gasoline transport completes the following:
- (1) Is tested annually according to test procedures consistent with Appendix A of "Control of Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems", EPA-450/2-78-051*, or equivalent procedure approved by the commissioner.
 - (2) Sustains a pressure change of no more than seven hundred fifty (750) pascals (three (3) inches of H₂O) in five (5) minutes when pressurized to a gauge pressure of four thousand five hundred (4,500) pascals (eighteen (18) inches of H₂O) or evacuated to a gauge pressure of one thousand five hundred (1,500)

- pascals (six (6) inches of H₂O) during the testing required subdivision (1).
- (3) Is repaired by the owner or operator and retested within fifteen (15) days of testing if it does not meet the criteria of subdivision (2).
 - (4) Displays a sticker which shows the date that the gasoline tank truck last passed the test required in subdivisions (1) through (2). Such sticker shall be displayed near the Department of Transportation Certification Plate required by 49 CFR 178.340-10b.
- b) The permittee shall operate the vapor control system and the gasoline loading rack in a manner that prevents:
- (1) gauge pressure from exceeding four thousand five hundred (4,500) pascals (eighteen (18) inches of H₂O) and a vacuum from exceeding one thousand five hundred (1,500) pascals (six (6) inches of H₂O) in the gasoline tank truck;
 - (2) a reading equal to or greater than one hundred percent (100%) of the lower explosive limit (LEL, measured as propane) at two and five-tenths (2.5) centimeters from all points on the perimeter of a potential leak source when measured by the method referenced in Appendix B of "Control of Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems", EPA 450/2-78-051, or an equivalent procedure approved by the commissioner during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and
 - (3) avoidable visible liquid leaks during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and
- c) The permittee shall repair and retest a vapor collection or control system that exceeds the limits in condition (b) within fifteen (15) days.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Volatile Organic Compound Emissions

The VOC emissions from the truck loading rack (EU1) shall be controlled by a carbon absorber vapor recovery unit at all times a gasoline tank truck is loaded at the truck loading rack. The vapor collection system on all gasoline tank trucks shall also be connected during each loading at the truck loading rack. Compliance with condition D.1.1(a) shall be determined by stack testing. The permittee shall conduct a stack test for VOC at the outlet of the carbon absorber vapor recovery unit within 720 days after the effective date of this permit. The permittee shall comply with the testing requirements specified in Section C -Performance Testing, of this permit.

D.1.5 Leaks from transports and vapor collection systems [326 IAC 8-4-4][326 IAC 2-7]

The permittee shall demonstrate compliance with condition D.1.2(a) using the following procedures:

- (1) The permittee shall obtain the vapor tightness documentation described in the

test methods and procedures in Appendix A of "Control of Volatile Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems, EPA EPA-450/2-78-051 for each gasoline tank truck that is to be loaded at the permitted loading racks;

- (2) The permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the terminal;
- (3) The permittee shall cross-check each tank identification number obtained in item (2) of this condition with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded;
- (4) The permittee shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at the permitted loading racks that the tank truck is not vapor-tight within 3 weeks after the loading has occurred; and
- (5) The permittee shall take steps to ensure that the non-vapor-tight gasoline tank truck will not be reloaded at the permitted loading rack until vapor tightness documentation for that tank truck is obtained.

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

D.1.6 Monitoring

The following conditions apply to the operation of the Vapor Collection System and Vapor Recovery Unit:

- (a) The Permittee shall monitor the following parameters outlined below on a daily basis except during Saturdays, Sundays and Holidays.
 - 1) Seal Fluid Level in separator (LG-301) shall be maintained at approximately center of vessel.
 - 2) Gasoline Level in Separator (LG-302) shall be maintained at approximately three (3) inches below center.
 - 3) Carbon bed vacuum pressure (PI-501) shall achieve 27 inches Hg during the desorption cycle of the carbon beds.
 - 4) The Carbon Bed Temperature shall be maintained at a temperature below 220 °F

The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions when measured parameters are outside of the range for any one reading.

- (b) The Permittee shall inspect the vapor collection system , vapor recovery unit and each loading rack that loads gasoline tank trucks on a daily basis for total organic compounds liquid or vapor leaks during product transfer operations. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable.

The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when total organic compounds liquid and vapor leaks are detected.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.7 Record Keeping Requirements

- (a) To document compliance with condition D.1.1(d) the permittee shall maintain daily records of gallons of gasoline, aviation gas, Jet A and diesel fuel dispensed at the loading racks.

- (b) To document compliance with condition D.1.5 , the permittee shall maintain the vapor tightness documentation for each gasoline tank truck that is to be loaded at the permitted loading racks. This documentation file for each gasoline tank truck is to be updated at least once per year to reflect current test results and shall include, at a minimum, the following information:
 - 1) Test title;
 - 2) Tank owner and address;
 - 3) Tank identification number;
 - 4) Testing location;
 - 5) Date of test;
 - 6) Tester name and signature;
 - 7) Witnessing inspector, if any: name, signature, and affiliation; and
 - 8) Test results: actual pressure change in 5 minutes, mm of water (average for two runs).

- (c) To document compliance with condition D.1.6(a), a log of the results of the daily, except during Saturdays, Sundays and Holidays, inspections and any corrective actions taken shall be kept.

- (d) A record of each monthly leak inspection required under Condition D.1.6(b) of this permit shall be kept on file at the terminal. Inspection records shall include, at a minimum, the following information:
 - 1) Date of inspection;
 - 2) Findings (may indicate no leaks discovered or location, nature, and severity of each leak);
 - 3) Leak determination method;
 - 4) Corrective action (date each leak repaired and reasons for any repair interval in excess of 15 calendar days);
 - 5) If applicable the date retest and

- 6) Inspector name and signature.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(d) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Storage tanks for petroleum products consisting of the following:

- (b) One (1) internal floating roof gasoline storage tank, identified as Z-11, with a maximum capacity of 1,499,400 gallons. Tank was constructed in 1938.
- (c) One (1) internal floating roof gasoline or Avgas storage tank, identified as Z-20, with a maximum capacity of 537,600 gallons. Tank was constructed in 1938.
- (d) One (1) internal floating roof gasoline storage tank, identified as Z-23, with a maximum capacity of 1,478,400 gallons. Tank was constructed in 1938.
- (e) One (1) internal floating roof gasoline storage tank, identified as Z-60, with a maximum capacity of 3,078,600 gallons. Tank was constructed in 1955.
- (f) One (1) internal floating roof gasoline storage tank, identified as Z-84, with a maximum capacity of 3,935,400 gallons. Tank was constructed in 1955.
- (g) One (1) fixed roof Jet A storage tank, identified as Z-21, with a maximum capacity of 571,200 gallons. Tank was constructed in 1938.
- (h) One (1) fixed roof Jet A storage tank, identified as Z-22, with a maximum capacity of 592,200 gallons. Tank was constructed in 1938.
- (i) One (1) fixed roof Jet A storage tank, identified as Z-61, with a maximum capacity of 4,485,600 gallons. Tank was constructed in 1955.
- (j) One (1) fixed roof diesel fuel storage tank, identified as Z-01, with a maximum capacity of 16,800 gallons. Tank was constructed in 1938.
- (k) One (1) fixed roof diesel fuel storage tank, identified as Z-82, with a maximum capacity of 1,470,000 gallons. Tank was constructed in 1948.
- (l) One (1) fixed roof diesel fuel storage tank, identified as Z-83, with a maximum capacity of 4,380,600 gallons. Tank was constructed in 1950.

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

D.2.1 Volatile Organic Compounds

Pursuant to 326 IAC 8-4-3, storage tanks Z-11, Z-20, Z-23, Z-60 and Z-84 shall meet the following requirements:

- (a) The tanks shall be retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with an equally effective alternative control which has been approved.
- (b) The tanks shall be maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.
- (c) All openings, except stub drains, shall be equipped with covers, lids, or seals such that:
 - (1) the cover, lid, or seal is in the closed position at all times except when in actual use;
 - (2) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supporters; and
 - (3) rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4.

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

D.2.4 Monitoring

The Permittee shall conduct a quarterly inspection of storage tanks Z-11, Z-20, Z-23, Z-60 and Z-84 for visible holes, tears, or other openings in the seal or any seal fabric or materials.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.5 Record Keeping Requirements

-
- (a) To document compliance with Condition D.2.1(b) and D.2.4, the Permittee shall maintain the following records:
- (1) the types of volatile petroleum liquid stored,
 - (2) the maximum true vapor pressure of the liquid as stored, and
 - (3) the results of the inspections performed on the storage vessels.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Insignificant emitting activities consisting of the following:

- (a) Two (2) boilers with heat input capacities of 0.6 and 0.8 MMBtu per hour and fired with distillate oil.
- (b) Cold Degreasing Operations

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

D.3.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-2 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 0.6 mmBtu per hour boiler shall be limited to 0.6 pounds per mmBtu heat input.

D.3.2 Volatile Organic Compounds (VOC)

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

millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination Requirement

D.3.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4(1).

State Form 47738 (5-96)

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

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

Source Name: Shell Oil Company - Zionsville Plant
Source Address: 5405 W. 96th Street, Indianapolis, Indiana 46268
Mailing Address: 5405 W. 96th Street, Indianapolis, Indiana 46268
FESOP No.: F097-5476-00077

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:

- 9 Annual Compliance Certification Letter
- 9 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)
- 9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
 AIR QUALITY MANAGEMENT SECTION
 DATA COMPLIANCE**

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

(For Control Equipment Monitoring Only)

Source Name: Shell Oil Company - Zionsville Plant
 Source Address: 5405 W. 96th Street, Indianapolis, Indiana 46268
 Mailing Address: 5405 W. 96th Street, Indianapolis, Indiana 46268
 FESOP No.: F097-5476-00077

If a deviation has occurred, a separate copy of this report must be submitted for each monitoring device on all control equipment listed in this permit. Attach a signed certification to complete this report.	
Stack/Vent ID:	
Control Equipment: (ex: thermal oxidizer, scrubber, baghouses)	
Type of Parameter Monitored: (ex: temperature, pressure drop, efficiency)	
<input type="checkbox"/> Continuously <input type="checkbox"/> Periodically, at a frequency of:	
Parameter Operating Restrictions/Range: (ex: 1,400°F, 2-4 psi pressure drop)	
Report Covers From: (date: month/day/yr)	To:
<input checked="" type="checkbox"/> Summary of Deviations from the Parameter Restriction/Range During the Monitoring Period are Identified Below. Complete Records Maintained at the Facility.	

	For Parameter Recorded Continuously	For Parameter Recorded Periodically
Total Unit Operating Time		
Total Time of Deviations (Identify All Deviations)		
Percent of Time Indicating Deviations ([2]/[1]x100)		

Date of Deviation	Start/Stop Time of Deviation (Continuous Monitoring Only)	Actual Value Recorded	Reason for Deviation & Corrective Action Taken

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE**

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

Source Name: Shell Oil Company - Zionsville Plant
Source Address: 5405 W. 96th Street, Indianapolis, Indiana 46268
Mailing Address: 5405 W. 96th Street, Indianapolis, Indiana 46268
FESOP No.: F097-5476-00077

If a deviation has occurred a separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit .
Attach a signed certification to complete this report.

Stack/Vent ID:
Equipment/Operation:
Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit: (ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)
Determination Period for this Parameter: (ex: 365-day rolling sum, fixed monthly rate)
9 Permit Has No Rate Limitations for this Parameter.
Content Restriction for this Parameter: (ex: maximum of 40% VOC in inks, 0.5% sulfur content)
Demonstration Method for this Parameter: (ex: MSDS, Supplier, material sampling & analysis)
9 Permit Has No Content Limitations for this Parameter.
Comments:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
 AIR QUALITY MANAGEMENT SECTION
 DATA COMPLIANCE**

FESOP Monthly Report

Source Address: 5405 W. 96th Street, Indianapolis, Indiana 46268
 Mailing Address: 5405 W. 96th Street, Indianapolis, Indiana 46268
 FESOP No.: F097-5476-00077:
 Facility: Truck Loading Rack
 Parameter: Gasoline throughput
 Limit: Total gasoline throughput less than 528,000,000 gallons per year

Month: _____ Year: _____

Day	Gallons of Gasoline Loaded Today	Gallons of Gasoline Loaded for Past 364 Days	Total Loading for Past 365 Days	Day	Gallons of Gasoline Loaded Today	Gallons of Gasoline Loaded for Past 364 Days	Total Loading for Past 365 Days
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
 AIR QUALITY MANAGEMENT SECTION
 DATA COMPLIANCE**

FESOP Monthly Report

Source Address: 5405 W. 96th Street, Indianapolis, Indiana 46268
 Mailing Address: 5405 W. 96th Street, Indianapolis, Indiana 46268
 FESOP No.: F097-5476-00077
 Facility: Truck Loading Rack
 Parameter: Diesel and Jet A throughput
 Limit: Total Jet A and Diesel fuel throughput less than 260,610,000 gallons per year

Month: _____ Year: _____

Day	Gallons of Gasoline Loaded Today	Gallons of Gasoline Loaded for Past 364 Days	Total Loading for Past 365 Days	Day	Gallons of Gasoline Loaded Today	Gallons of Gasoline Loaded for Past 364 Days	Total Loading for Past 365 Days
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

**Indiana Department of Environmental Management
Office of Air Management
and
Environmental Resources Management Division
Air Quality Management Section**

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP)

Source Background And Description

Source Name:	Shell Oil Products Company - Zionsville Plant
Source Location:	5405 West 96th Street, Indianapolis, Indiana 46268
County:	Marion
SIC Code:	5171
Operation Permit No.:	F097-5476-00077
Permit Reviewer:	Patrick Coughlin

The Office of Air Management (OAM) and the Environmental Resources Management Division (ERMD), has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Shell Oil Products Company - Zionsville Plant, relating to the operation of a storage and distribution station for petroleum products.

Permitted Emissions Units and Pollution Control Equipment

The source consists of the following approvals (permits, registrations, exemptions, etc.) with the following emission units and pollution control devices:

- (1) One (1) truck loading rack equipped with a Vapor Recovery Collection System, The loading rack has a maximum fuel dispensing capacity of 198,000 gallons per hour. The VOC emissions are controlled by a carbon adsorber, identified as CD1, which exhausts out one stack, identified as Stack I.D. #002. The loading rack was constructed in 1938.
- (2) Storage tank Z-11, capacity 40,000 barrels, internal floating roof, storing premium unleaded gasoline, constructed in 1938.
- (3) Storage tank Z-20, capacity 15,000 barrels, internal floating roof, storing gasoline constructed in 1938.
- (4) Storage tank Z-23, capacity 40,000 barrels, internal floating roof, storing premium unleaded gasoline, constructed in 1938.
- (5) Storage tank Z-60, capacity 80,000 barrels, internal floating roof, storing regular unleaded gasoline, constructed in 1955.
- (6) Storage tank Z-84, capacity 110,000 barrels, internal floating roof, storing regular leaded gasoline, constructed in 1955.

Unpermitted Emissions Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process.

Insignificant Emitting Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
- (3) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (4) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (5) Paved and unpaved roads and parking lots with public access.
- (6) Other categories with emissions below insignificant thresholds
- (7) The following tanks with potential emissions less than 15 pounds per day of VOC emissions.
 - (A) Jet A storage tanks:
 - (a) Tank Z-21, capacity 571,200 gallons, fixed roof cone tank.
 - (b) Tank Z-22, capacity 592,200 gallons, fixed roof cone tank.
 - (c) Tank Z-61, capacity 4,485,600 gallons, fixed roof cone tank.
 - (B) Diesel fuel storage tanks:
 - (a) Tank Z-01, capacity 16,800 gallons, fixed roof cone tank.
 - (b) Tank Z-82, capacity 1,470,000 gallons, fixed roof cone tank.
 - (c) Tank Z-83, capacity 4,380,600 gallons, fixed roof cone tank.

Existing Approvals

This source has been operating under the following approvals:

- (1) Operating Permit issued on November 3, 1993, covers all significant emitting units included in the FESOP application.
- (2) Construction Permit 900077-01 issued December 5, 1990, for the installation of a new

vapor recovery unit.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the FESOP be approved. This recommendation is based on the following facts and conditions:

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

A complete FESOP application for the purposes of this review was received on March 15, 1996.

Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations (pages 1 through 4 in Appendix A)

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	0.0
PM-10	0.0
SO ₂	0.0
VOC	2150
CO	0.0
NO _x	0.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

See attached spreadsheets for detailed calculations (pages 1 through 4 in Appendix A)

HAP	Potential Emissions (tons/year)
Single HAP	>10.0
Total HAP	>25.0

See attached spreadsheets for detailed calculations (pages 1 through 4 in Appendix A)

(a) The potential emissions (as defined in the Indiana Rule) of Volatile Organic Compound

Emissions are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

Limited Potential To Emit

- (a) The source has accepted a federally enforceable limit on potential to emit VOC of 99 tons per year, consisting of:
 - (i) 94.82 tons per year for the significant activities; and
 - (ii) 4.18 tons per year for the insignificant activities.
- (b) The source has accepted a limit on the potential to emit of 9.4 tons per year for any single HAP and 24 tons per year for any combination of HAPs. Based on IDEM memorandum from Mr. Ed Streno, limiting the VOC emissions to less than 99 tons per 356 day period of satisfies the requirement to limit HAP emissions to less than 9.4 tons for any single HAP and 24 tons for any combination of HAPs.
- (c) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

Emissions Summary (tons / year)	Limited Potential to Emit (tons/year)
Process / facility	VOC
Gasoline Storage Tanks : Z-11, Z-20, Z-23, Z-60, Z-84	24.19
Jet A Storage Tanks : Z-21, Z-22, Z-61, and Diesel Storage Tanks Z-1, Z-82, Z-83	3.58
Load Rack / Vapor Recovery Unit, Rack / VRU	
1) Point	33.04
2) Fugitive - Gasoline Dispensing	27.46
3) Fugitive - Diesel & Jet A Dispensing	6.57
Insignificant Activities	4.18
Total Emissions	99

Note: Throughput restrictions for gasoline effectively limit HAP emissions to below Part 70 Major Source thresholds

County Attainment Status

The source is located in Marion County.

Pollutant	Status (attainment or unclassifiable/severe, moderate, marginal, or maintenance nonattainment)
TSP	Non-attainment
PM-10	Attainment
SO ₂	Attainment
VOC	Attainment
CO	Attainment
NO ₂	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment for ozone.

Federal Rule Applicability

There are no New Source Performance Standards (326 IAC 12) applicable to this facility.

The Loading Rack is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.500, Subpart XX because of date of construction. This NSPS was mistakenly applied to this source in existing approvals.

The storage tanks are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110-113, 110a-115a, and 110b-117b, Subparts K, Ka, and Kb, because these tanks were all installed prior to the effective dates of these regulations.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it emits more than ten (10) tons per year of VOC and is located in Marion County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3

(Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability

326 IAC 2-8-4: FESOP

Pursuant to this rule, the amount of VOC emissions shall be limited to 99 tons per 365 day period. Shell Oil Products Company - Zionsville Plant has accepted following restrictions in order to comply with this limit:

- 1) Shell oil has agreed to a short term limit of 15 milligrams of volatile organic compounds per liter to gasoline product loaded at the outlet of the carbon adsorber which controls emissions from the loading rack.
- 2) Shell oil has agreed to limit the throughput of gasoline products to less than 528,000,000 gallons per 365 day period and all other petroleum product combined to less than 260,610,000 per 365 day period.

These emissions limitations are equivalent to 99 tons of VOC emissions per 365 day period, such that the requirement of 326 IAC 2-7 shall not apply.

326 IAC 6-2-2: Particulate Emissions Limitation for Indirect Heaters

Pursuant to 326 IAC 6-2-2 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 0.6 mmBtu per hour boiler shall be limited to 0.6 pounds per mmBtu heat input.

326 IAC 8-3-5: Cold Cleaner Degreaser Operation and Control

326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control) applies to all cold degreasing operations located in Marion County.

326 IAC 8-4-3: Petroleum Liquid Storage Facilities

Storage tanks Z-11, Z-20, Z-23, Z-60 and Z-84 are subject to the requirements of 326 IAC 8-4-3 because the storage capacities of these tanks are greater than 39,000 gallons and the liquid material stored has a true vapor pressure greater than 10 kPa (1.52 psia). This rule requires specific measures be taken to prevent leakage from the tanks. The tanks are equipped with internal floating roofs which meet the requirements of this regulation.

326 IAC 8-4-4: Bulk Gasoline Terminals

The requirements of 326 IAC 8-4-4 applies to all bulk gasoline terminals as defined in 326 IAC 1-2-7. This regulation requires the permittee to operate a vapor control system when loading gasoline into tanker trucks. VOC shall be controlled by a carbon adsorber which processes and recovers vapors and gasses from the equipment being controlled and which releases no more than 80 mg of VOC per liter of gasoline dispensed. The limit set on the Vapor Recovery

Collection System needed to comply with 326 IAC 2-8, satisfies the requirements of 326 IAC 8-4-4.

326 IAC 8-4-9: Leaks from Transports and VRU

The source is subject to the requirements of 326 IAC 8-4-9 because the source operated a vapor control system. Compliance with this rule will prevent leakage from transports and the VRU during loading, and will require recordkeeping.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The following conditions apply to the operation of the Vapor Collection System and Vapor Recovery Unit:

- (a) The Permittee shall monitor the following parameters outlined below on a daily basis, except during Saturdays, Sundays and Holidays.
 - 3) Seal Fluid Level in separator (LG-301) shall be maintained at approximately center of vessel.
 - 2) Gasoline Level in Separator (LG-302) shall be maintained at approximately three (3) inches below center.
 - 3) Carbon bed vacuum pressure (PI-501) shall achieve 27 inches Hg during the desorption cycle of the carbon beds.
 - 4) The Carbon Bed Temperature shall be maintained at a temperature below 220 °F

The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency

and corrective actions when measured parameters are outside of the range for any one reading.

- (b) The Permittee shall inspect the vapor collection system , vapor recovery unit and each loading rack that loads gasoline tank trucks on a daily basis for total organic compounds liquid or vapor leaks during product transfer operations. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable.

The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when total organic compounds liquid and vapor leaks are detected.

These monitoring conditions are necessary because the VRU must operate properly to ensure compliance with 326 IAC 2-8 (FESOP).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 189 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application GSD-08.

This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.

Conclusion

The operation of this storage and distribution station for petroleum products will be subject to the conditions of the attached proposed FESOP No. F097-5476-00077.

Table 1

Emission Unit: VRU		
Date of Construction: 1991(Replacement of VRU only), loading rack was installed in in 1950s		
Alternative Scenario: none		
Pollution Control Equipment: carbon adsorption		
General Description of Requirement:	VOC emissions limit	Throughput limits
Numerical Emission Limit:	20 milligrams per liter (mg/l)	Gasoline & Avgas: 528,000,000 gal per 365 day period. Jet A & Diesel: 260,610,000 gal per 365 day period.
Regulation/Citation:	326 IAC 2-8	326 IAC 2-8
Compliance Demonstration:	not exceeding outlet concentration of 15 mg/l	Recordkeeping / Reporting
PERFORMANCE TESTING		
Parameter/Pollutant to be Tested:	Stack Testing	n/a
Testing Method/Analysis:	n/a	n/a
Testing Frequency/Schedule:	n/a	n/a
Submittal of Test Results:	n/a	n/a
COMPLIANCE MONITORING		
Monitoring Description:	Daily inspection	Throughput limit
Monitoring Method:	n/a	Daily Log
Monitoring Regulation/Citation:	n/a	n/a
Monitoring Frequency:	n/a	daily
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	see condition D.1.6(a)	Fuel Received
Recording Frequency:	upon request	daily
Submittal Schedule of Reports:	upon request	quarterly
REPORTING REQUIREMENTS		
Information in Report:	n/a	amount of fuel received
Reporting Frequency/Submittal:	n/a	quarterly
Additional Comments:	n/a	n/a

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

Shell Oil Products Company - Zionsville Plant
5405 West 96th Street
Indianapolis, Indiana 46268

F097-5476-00077

On November 6, 1996, the Environmental Resources Management Division (ERMD) had a notice published in the Indianapolis Star Newspaper, Indianapolis, Indiana, stating that Shell Oil Products Company - Zionsville Plant had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a Bulk Petroleum Products Terminal with control. The notice also stated that ERMD proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

Upon further review, the ERMD and IDEM have decided to make the following changes to the FESOP:

1. Section A, B and C of this FESOP has been updated to include numerous revisions to the rule cites and minor modification to the wording of several conditions to be consistent with state rules. Due to the nature of these minor changes the identification of each of the individual changes will not be identified in this document.
2. The following new condition have been added to Section C to reflect state and federal rule;
 - a) Condition C.1 - Overall Source Limit
 - b) Condition C.7 - Asbestos Abatement Projects -Accreditation
 - c) Condition C.13 - Asbestos Abatement Projects
 - d) Condition C.14 - Emergency Reduction Plans
 - e) Condition C.15 - Risk Management Plans
 - f) Condition C.21 - Stratospheric Ozone Protection
3. Major revisions to exiting conditions in Section C of this FESOP has been made to provide clarity and reflect state rules.
 - a) Condition C.15 - Compliance Monitoring Plan has been modified by IDEM to provide clarity.
4. Major revisions to Section D of this FESOP.
 - a) ERMD has separated the Tanks and loading rack into two (2) D sections and has added section D.3 for insignificant emitting activities.
 - b) Previous condition D.1.1, (now renumbered D.1.1 (d)) was revised. The new throughput limits are 528,000,000 gallons of gasoline and 260,610,000 gallons of Diesel and Jet A fuel. This limit is equivalent to 67 tons of VOCs per 365 day period. This revision was necessary to limit the source wide VOC emissions to less than 99 tons per 365 day period such that the Part 70 Operating Permit Requirements shall not apply.

- c) Condition D.1.2 opacity limitation was eliminated from Section D of the permit. The opacity limitation was included in Section C of the permit as a generally applicable requirement.
- d) Addition of the requirement to have a Preventive Maintenance Plan for the Loading Rack and control equipment.
- e) Addition of a new section for compliance determination which includes a condition for stack testing the Carbon Adsorber for VOCs, and requirements to document compliance with requirement for all gasoline tanker trucks to pass the vapor tightness test prior to loading.
- f) Condition D.1.3 was moved to section D.2 and was revised to show that 326 IAC 8-4-3 does not apply to tanks Z-82, Z-83, Z-21, Z-22 and Z-61.
- g) Condition D.1.4 was reworded.
- h) Condition D.1.5 (Compliance Monitoring) was revised. The new compliance monitoring condition requires daily, except during Saturdays, Sundays and Holidays, inspection of the following parameters listed below:
 - 1) Seal Fluid Level in separator (LG-301) shall be maintained at approximately center of vessel.
 - 2) Gasoline Level in Separator (LG-302) shall be maintained at approximately three (3) inches below center.
 - 3) Carbon bed vacuum pressure (PI-501) shall achieve 27 inches Hg during the desorption cycle of the carbon beds.
 - 4) The Carbon Bed Temperature shall be maintained at a temperature below 220 °F .
 - 5) The Permittee shall inspect the vapor collection system , vapor recovery unit and each loading rack that loads gasoline tank trucks on a daily basis for total organic compounds liquid or vapor leaks during product transfer operations. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable.
- i) Condition D.1.7 was eliminated
- j) Condition D.1.6 has been revised to require stack testing at the outlet of the carbon adsorber within 270 days of permit issuance. This condition can be revised if the source completes stack testing prior to permit issuance.
- k) Conditions D.1.8, D.1.9 and D.1.10 have been revised and incorporated into one condition. Recordkeeping requirements have been expanded to include the following condition:
 - 1) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- l) Section D.3 was added to include applicable requirement for insignificant emitting

activities.

The following table lists the revised limited Potential to Emit.

Emissions Summary (tons / year)	Limited Potential to Emit (tons/year)
Process / facility	VOC
Gasoline Storage Tanks : Z-11, Z-20, Z-23, Z-60, Z-84	24.19
Jet A Storage Tanks : Z-21, Z-22, Z-61, and Diesel Storage Tanks Z-1, Z-82, Z-83	3.58
Load Rack / Vapor Recovery Unit, Rack / VRU	
1) Point	33.04
2) Fugitive	34.03
Insignificant Activities	4.18
Total Emissions	99

Note: Throughput restrictions for gasoline effectively limit HAP emissions to below Part 70 Major Source thresholds

During the Public Comment Period ERMD received the following comments from Shell Oil Company:

1. Page 4 of 33, Source Summary A.1 - typographic error corrected.
2. Page 5 of 33 Source summary A.2 description of emissions unit revised.
3. Page 18 of 33, Source Operating Conditions C.1 has been revised such that the continuous operation of the control equipment is not required.
4. Page 21 of 33 Source Operating condition C.13 - has been revised such that records of when the control equipment is not operating are no longer required.
5. Page 22 of 33 Source Operating Condition C.15 - ERMD believes that annual reporting is too long a time period for the agency to verify compliance on a daily basis rolling sum. Therefore ERMD is requiring shell to submit reports on a quarterly basis.
6. Page 24 of 33 Condition D.1.1(a)(b)(c) - ERMD has eliminated the throughput limits for individual tanks. ERMD has two (2) throughput limits one for gasoline products and one for all other petroleum products combined dispensed at the rack. These throughput limits are necessary to limit the potential to emit in a practical and enforceable manner.
7. Page 25 of 33 Condition D.1.1(d) this condition has been omitted from the permit per your request.
8. Page 25 of 33 condition D.1.3 has been revised to omit tanks Z-82, 83, 21, 22 and 61 from the requirements to comply with 326 IAC 8-4-3.
9. Page 25 of 33 Condition D.1.5 and D.1.6 were revised such that there are no requirements on the carbon bed regeneration frequency.
10. Page 25 of 33 Condition D.1.7 recordkeeping for carbon bed regeneration frequency has been omitted.

11. Page 25 of 33 Condition D.1.8 see response to comment #6.
12. Page 26 of 33 condition D.1.10 ERMD believes that recordkeeping of tanker truck certification should apply to all tanker trucks which receive gasoline products from the terminal.
13. Pages 31,32,33 of 33 FESOP Quarterly Reports, ERMD believes that Quarterly reports are necessary to verify compliance with FESOP limits.
14. Page 4 of 6 in the Technical Support Document, ERMD has revised the throughput limits and PTE for gasoline and the combination of other petroleum products. ERMD believes that throughput limits are necessary to limit the PTE for this source.
15. Page 5 of 6 in the Technical Support Document, ERMD has removed the requirements for carbon bed regeneration.
16. Page 6 of 6 in Technical Support Document, ERMD has removed throughput limits for tanks.

On October 20, 1997 ERMD received the following comments on the proposed permit from Shell Oil Products Company:

1. Section A responsible official has been changed from R. J Sorge to T. J. Rizzoli

ERMD has made this correction.
2. Condition D.1.6(a) Shell Oil Company requests that the daily monitoring not be required on Sundays, Saturdays or Holidays.

ERMD understands that the loading rack can operate as an unmanned plant and is equipped with an alarm system to indicate when the Carbon Adsorber is not working properly and automatically notify the appropriate individual responsible for corrective action if needed. Therefore ERMD has revised condition D.1.6(a) and D.1.7(c) such that no monitoring or recordkeeping of the monitored parameters is required during Saturdays, Sundays and Holidays. The TSD and TSD addendum have been changed to reflect this revision.
3. Condition D.1.6(a)(3) should be changed to read "Carbon bed vacuum pressure (PI-501) shall achieve 27 inches Hg during the desorption cycle of the carbon beds".

ERMD has revised this condition as requested and has revised the TSD and TSD addendum to correspond to this revision.
4. Condition D.1.7(c) should be changed to indicate that the monitoring records are not required to be kept for Saturdays, Sundays and Holidays.

See response to comment 2.

Insignificant Emitting Activities

1. 0.6 MMBtu/hr Natural Gas Fired Boiler

Heat Input Capacity, MMBtu/hr	0.6
Potential Throughput, MMCF/yr	5.2
Emission Factor in lb/MMCF	5.3
Source of Emissions Factor	AP-42, Tables 1.4-1,2 &3
Potential Emission in tons/yr	0.0137

2. 12,600 and 4,200 gallons additive tanks (Data supplied in the application)

0.05 tons/yr

3. Degreasing Operation (Assumed a maximum usage of 145 gal/yr, and a density of 7.36 lbs/gal)

0.53 tons/yr

4. Tanker Degassing (Assumed a default value of 15 pounds per day)

2.74 tons/yr

5. Valves, Flanges and Pumps, Fugitive Emissions

Components		Emissions Fator (lb/hr/comp)	Count	Hours	Emissions (lbs/hr)	Emissions (tons/yr)
Valves	Vapor	0.0000287	22	8760	0.0006	0.0028
	Light Liquids	0.0000948	865	8760	0.0820	0.3592
Pumps	Light Liquids	0.00117	36	8760	0.0421	0.1845
Flanges	Vapor	0.0000904	142	8760	0.0128	0.0562
	Light Liquids	0.0000172	924	8760	0.0159	0.0696
Other	Vapor	0.000265	10	8760	0.0027	0.0116
	Light Liquids	0.000287	125	8760	0.0359	0.1571

Total Emissions from valves pumps and flanges

0.8410

Total VOC emissions from insignificant emitting activities: 4.18 tons/yr

Emissions From Loading Rack and VRU

Loading Loss Emissions Calculations

$$\begin{aligned}
 UE &= (L/1000 \times GT)/2000 \\
 CEV &= EL \text{ mg/l} \times GTG \text{ gal/yr} \times (CP \text{ lbs/mg} / CG \text{ gal/l}) \\
 DFE &= ((GTD \times (Ld/1000))/2000) \\
 GFE &= ((GTG \times (Lg/1000))/2000) \times (1-CE)
 \end{aligned}$$

Where:

GTG = Limited throughput of gasoline per year (Permit limit, gallons per 365 day period)
 GTD = Limited throughput of Jet A & Deisel per year (Permit limit, gallons per 365 day period)
 EL = emissions limitation for VOC from the outlet of the VRU, mg/l
 CE = capture efficiency for VOCs (see note (1) below)
 CG = 0.2642 gal equals 1 liter
 CP = 2.2046 x 10⁻⁶ pounds equal 1 milligram
 Lg = loading loss, pounds per 1000 gallons of gasoline loaded (see note (2) below)
 Lj = loading loss, pounds per 1000 gallons of Jet A loaded (see note (3) below)

Data Inputs	
	528,000,000.00
	260,610,000.00
	15
	98.70%
	0.2642
	2.2046E-06
	8.00
	0.0504

UE = uncontrolled VOC emissions tons per year (worst case all gasoline, tons/yr)
 CVE = controlled emission rate from VRU (gasoline, tons/yr)
 DFE = VOC emissions tons per year (jet A, tons/yr)
 GFE = fugitive emissions from leaks in transports and VRU, gasoline, tons/yr

	2,112.00
	33.04
	6.57
	27.46

Total Emissions form loading rack and VRU (tons/yr)

	67.07
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(1) Pursuant to the Notice of Proposed Change to AP-42 Section 5.2, the collection efficiency for tanker trucks which meet annual pressure testing of 3 inches of water column pressure change for a five minute period when pressurized to a pressure of 6 inches of water is 98.7%

(2) AP-42 Table (submerged loading vapor balance service)

(3) Loading Loss emissions factor supplied by the applicant, since the throughput of Deisel and Jet A are being combined, the emissions factor resulting in the greatest emissions was used.

Storage Tank Emissions

Storage Tanks ID	Product Stored	Type of Tank	Tank Volumes (Ft3)	Tank Volumes (gal)	Date Installed
Z-11	Gasoline	Internal Floating Roof	200,440	1,499,391	1938
Z-20	Gasoline or Avgas	Internal Floating Roof	71,866	537,594	1938
Z-23	Gasoline	Internal Floating Roof	197,633	1,478,394	1938
Z-60	Gasoline	Internal Floating Roof	411,547	3,078,577	1955
Z-84	Gasoline	Internal Floating Roof	526,084	3,935,371	1955
Z-21	Jet A	Fixed Roof Cone	76,358	571,196	1939
Z-22	Jet A	Fixed Roof Cone	79,165	592,194	1939
Z-61	Jet A	Fixed Roof Cone	599,635	4,485,570	1955
Z-01	Diesel	Fixed Roof Cone	2,246	16,801	1938
Z-82	Diesel	Fixed Roof Cone	196,510	1,469,993	1948
Z-83	Diesel	Fixed Roof Cone	585,599	4,380,573	1950

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

Storage Tanks ID	Tank Volumes (gal)	Turnovers	Throughput (Gal)	Withdrawal Loss	Withdrawal Loss Lbs/1000 gal	Rim-Seal Loss	Deck Fitting
Z-11	1,499,391	52	77,968,354	169	0.002168	4,163	1,604
Z-20	537,594	47	25,266,900	73	0.002889	2,627	2,111
Z-20 (avgas)	537,594	47	25,266,900	80	0.003166	3,075	2,470
Z-23	1,478,394	53	78,354,864	169	0.002157	4,164	4,426
Z-60	3,078,577	52	160,086,021	249	0.001555	5,878	6,298
Z-84	3,935,371	52	204,639,311	265	0.001295	6,858	2,219
				1,005		24,138	17,017

Maximum Gasoline throughput (gal/yr)	528,000,000.00
Maximum withdrawal loss (lbs/1000 gal)	0.003166
Maximum emissions from Withdrawal Loss (lbs/yr)	1,671.75
Standing Loss for Gasoline, Rim-Seal Loss + Deck Fitting Loss (lbs/yr)	41,155.00
Standing Loss for Avgas, Rim-Seal Loss + Deck Fitting Loss (lbs/yr)	5,545.00
Total Emissions form Gasoline and Avgas (tons/yr)	24.19

Storage Tanks ID	Tank Volumes (gal)	Turnovers	Throughput (Gal)	Withdrawal Loss	Withdrawal Loss Lbs/1000 gal	Standing Loss
Z-21	571,196.02	40	22,847,840.76	445.40	0.019494	97.60
Z-22	592,193.78	39	23,095,557.52	445.40	0.019285	97.60
Z-61	4,485,569.62	10	44,855,696.18	948.29	0.021141	728.45
Z-01	16,801.20	64	1,075,276.99	10.92	0.010156	2.07
Z-82	1,469,993.06	18	26,459,874.99	418.42	0.015813	182.13
Z-83	4,380,573.32	18	78,850,319.75	1,307.57	0.016583	546.67
				3,576.00		1654.52

Maximum Throughput Diesel (gal/yr)	107,310,000.00
Maximum Throughput Jet A (gal/yr)	153,300,000.00
Total throughput of Diesel and Jet A	260,610,000.00
Maximum withdrawal loss (lbs/1000 gal)	0.021141
Maximum emissions from Withdrawal Loss (lbs/yr)	5,509.53
Standing Loss for Gasoline, Rim-Seal Loss + Deck Fitting Loss (lbs/yr)	1,654.52
Total Emissions form Deisel and Jet A (tons/yr)	3.58

Source Wide Emissions

TSD App A page 4 of 4

Facilities	Limited PTE (tons/yr)	Potential Emissions (tons/yr)
Tanks Gasoline & Avgas	24.19	24.19
Tanks Diesel & Jet A	3.58	3.58
Fugitive from loading gasoline	27.46	2,112.00
Fugitive from loading Deisel & JetA	6.57	6.57
VRU outlet	33.04	NA
Insignificant Emitting Activities	4.18	4.18
Total Emissions	99.01	2,150.51

