

# FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

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

**Marathon Oil Company-Speedway Terminal  
1304 Olin Avenue  
Indianapolis, Indiana 46224**

(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.: F097-5515-00078   |                |
| Issued by:<br>Dr. Robert Holm, Administrator<br>Environmental Resources 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 ERMD, and presented in the permit application.

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

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

Responsible Official: Mr. Fred Adams  
Source Address: 1340 Olin Avenue, Indianapolis, Indiana 46224  
Mailing Address: P.O. Box 24002, Indianapolis, Indiana 46224  
SIC Code: 5171  
County Location: Marion  
County Status: Nonattainment for total suspended particulate  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD;

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

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

- (a) One (1) petroleum products truck loading rack, identified as Loading Rack, with one (1) carbon absorber vapor recovery system to control VOC emissions and one (1) backup portable trailer mounted vapor combustor. The maximum loading capacity of all petroleum products at this unit is 525,000,000 gallons per year and fugitive emissions, identified as F1, associated with this unit arise from valves, loading arms, meters, pumps, etc.
- (b) Six (6) storage tanks for petroleum products consisting of the following:
  - (1) One (1) transmix storage tank, identified as Tank T-6, with a maximum capacity of 46,859 gallons. Based on its HAP and VOC emissions, this emission unit is an insignificant activity.
  - (2) One (1) gasoline storage tank, identified as Tank 55-5, with a maximum capacity of 1,986,080 gallons.
  - (3) One (1) gasoline storage tank, identified as Tank 55-11, with a maximum capacity of 2,125,704 gallons.
  - (4) One (1) gasoline storage tank, identified as Tank 80-12, with a maximum capacity of 3,200,148 gallons.
  - (5) One (1) gasoline storage tank, identified as Tank 80-13, with a maximum capacity of 3,204,726 gallons.
  - (6) One (1) gasoline storage tank, identified as Tank 80-14, with a maximum capacity of 3,203,298 gallons.
- (c) Annual tank truck vapor tightness testing operations, identified as Garage.

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

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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) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
- (c) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.
- (d) A petroleum fuel, other than gasoline, dispensing facility, having storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (e) The following VOC and HAP storage containers: (a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.  
(b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (g) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (h) Closed loop heating and cooling systems.
- (i) Groundwater oil recovery wells.
- (j) Activities associated with the treatment of wastewater streams with oil and grease content less than or equal to 1% by volume.
- (k) Process vessels degassing and cleaning for internal repairs.
- (l) Paved and unpaved roads and parking lots with public access.
- (m) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities are not associated with the production process.
- (n) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (o) Activities with VOC emissions less than 3 lbs per hour or 15 lbs per day. These include the following:
  - (1) Tanks 20-1 through 20-4, 20-7, 20-9, 55-10, and RB 8-1. All holding No.2 fuel oil.

- (2) Tank 55-8, holding aviation fuel.
- (3) Tanks AA 8-1, AA 10-2, 3-15, AA 30-2 and AA 30-1. All holding gasoline additive.
- (4) Tank AA 4-3, holding fuel oil additive.
- (5) Tank AA 1-5, holding jet fuel de-icer.
- (6) One (1) underground tank holding oil and water mix from an oil/water separator.

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]**

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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]**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, 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)]**

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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]**

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- (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)]**

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

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

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- (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)]**

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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)]**

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- (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]**

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- (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)]**

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- (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)]**

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- (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, Data Compliance  
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]**

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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)]**

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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]**

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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]**

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- (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)]**

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- (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]**

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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]**

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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)]**

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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]**

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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)]**

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- (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**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit, exceed the level specified in any condition of this permit, 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**

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

One (1) petroleum products truck loading rack, identified as Loading Rack, with one (1) carbon absorber vapor recovery system to control VOC emissions and one (1) backup portable trailer mounted vapor combustor. The maximum loading capacity of all petroleum products at this unit is 525,000,000 gallons per year and fugitive emissions, identified as F1, associated with this unit arise from valves, loading arms, meters, pumps, etc.

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

#### D.1.1 Emission Limits, Standards, and Other Emissions-Related Requirements: [40 CFR Part 60.502] [326 IAC 8-4-9][326 IAC 8-4-4][326 IAC 2-7][40 CFR Part 63.420]

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- (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 gasoline tank trucks during product loading. [326 IAC 8-4-4 (a)][40 CFR Part 60.502(a)]
- (b) Each vapor collection system shall be designed to prevent any volatile organic compound (VOC) vapors collected at one loading rack from passing to another loading rack.[40 CFR Part 60.502(d)]
- (c) 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. [326 IAC 8-4-4 (a)(3)]
- (d) Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks. Vapor-tight gasoline tank truck shall mean a gasoline tank truck which has demonstrated within the twelve (12) preceding months that its product delivery tank will sustain a pressure change of not more than 750 pascals (75 mm of water) within a five minutes after it is pressurized to 4,500 pascals (450 mm of water). This capability is to be demonstrated using the pressure test procedure specified in 40 CFR Part 60 Appendix A Method 27. [326 IAC 8-4-9][40 CFR Part 60.502(e)]
- (e) The permittee shall act to ensure that loadings of gasoline tank trucks at the permitted loading racks are made only into tank trucks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.[40 CFR Part 60.502(f)]
- (f) The permittee shall act to ensure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the permitted loading racks.[40 CFR Part 60.502(g)]
- (g) The vapor collection and liquid loading equipment shall be designed and operated to

prevent gauge pressure in the gasoline tank truck from exceeding four thousand five hundred (4,500) Pascals (Pa) (450 mm of H<sub>2</sub>O) during product loading. This level shall not be exceeded when measured by the procedures specified in the test methods 40 CFR 60.503(d).[40 CFR Part 60.502(h)]

- (h) No pressure-vacuum vent in the permitted terminal's vapor collection system shall begin to open at a system pressure less than 4,500 Pa (18 inches of H<sub>2</sub>O). [40 CFR Part 60.502(i)]
- (i) Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.[40 CFR Part 60.502(j)] [326 IAC 8-4-9(d)]
- (j) Loading of gasoline tank trucks shall be restricted to the use of submerged fill.
- (k) The VOC emission to the atmosphere from the control device (carbon absorber vapor recovery unit or backup trailer mounted flare) on the Loading Rack due to loading of liquid product into gasoline tanker trucks shall not exceed 35 milligrams per liter of gasoline (0.292 lbs/1000 gals gasoline) outlet concentration. This conditions will satisfy 326 IAC 8-4-4(1)(A), and 40 CFR Part 60.502(c).
- (l) When using the backup portable trailer mounted vapor combustor to control VOC emissions for the loading rack. The backup portable trailer mounted vapor combustor shall be designed and operated to meet the following requirements, at all times when emissions may be vented to this control devise:
  - 1) no visible emissions except for periods not to exceed 5 minutes in a two hour period,
  - 2) flare pilot flame present as determined through the use of a thermocouple or any other equivalent devise to detect the presence of a flame.
  - 3) gas being combusted shall have a heat content of 300 Btu/scf or greater, and
  - 4) an exit velocity less than 54.76 ft/sec.
- (m) The throughput of gasoline dispensed at the loading rack shall not equal or exceed 280,000,000 gallons per 365 day period, rolled on a daily basis. This throughput is equivalent to a VOC emission rate of 55.45 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.

#### D.1.2 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 any control devices.

### **Compliance Determination Requirements**

#### D.1.3 Stack Testing Requirement

To determine compliance with condition D.1.1(k), the permittee shall conduct a stack test for VOCs at the outlet of the Vapor Recovery unit within 270 days after the effective date of this permit. The permittee shall comply with the testing requirements specified in Sections C -

Performance Testing, of this permit.

#### D.1.4 Vapor Collection and Liquid Loading Equipment

Compliance with condition D.1.1(g) shall be determined in pursuant to the procedures specified in 40 CFR 503(d). Testing to document compliance with condition D.1.1(d) is not specifically required by this permit. However, ERMD and IDEM, OAM reserves the right to request testing to document compliance with Condition D.1.1(d) under 326 IAC 2-1-4(f) and 326 IAC 2-8-4.

#### D.1.5 Leaks from Transports and Vapor Collection Systems

Compliance with Condition D.1.1(d) shall be determined using the following procedures:

- 1) The permittee shall obtain the vapor tightness documentation described in the test methods and procedures in 40 CFR 60.505(b) 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 paragraph (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 VRU and the vapor combustor:

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

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

The Permittee shall conduct a daily inspection of the carbon bed pressure strip chart records for any deviations in the carbon bed regeneration cycle time mentioned above since the daily last inspection.

The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the regeneration cycle is outside of the above mentioned

range for any one reading.

- (b) The Permittee shall install and maintain a monitor to detect the presence of a flame at the flare tip. The presence of a flame at the flare tip shall be monitored at all time when the vapors are being vented to the flare. The monitor shall be equipped with an automatic alarm which activates when the presence of a flame is not detected during periods when gasoline vapors are being vented to the flare.

The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the visible emissions notations are abnormal for any one observation.

- (c) Each calendar month, the vapor collection system, the vapor control system, and each loading rack that loads gasoline tank trucks shall be inspected 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. [40 CFR Part 60.502(j)] [326 IAC 8-4-9(d)]

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**

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- (a) To document compliance with the tank truck vapor tightness documentation required in Condition D.1.1(d) of this permit shall be kept on file at the terminal in a permanent form available for inspection.
- (b) To document compliance with condition D.1.1(m) the permittee shall maintain daily records of gallons of gasoline, kerosene and distillate dispensed at the loading racks.
- (c) Records of the results of all inspections required in the Preventive Maintenance Plan.
- (d) The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, at a minimum, the following information:
- 1) Test title: Gasoline Delivery Tank Pressure Test--EPA Reference Method 27;
  - 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).
- (e) To document compliance with condition D.1.6(a), the permittee shall maintain the continuous strip chart of the carbon bed pressure which has been matched against the loading records.
- (f) To document compliance with D.1.6(b) the permittee shall keep records of the date and time whenever the automated alarm used to detect the presence of a flame is activated.
- (g) A record of each monthly leak inspection required under Condition D.1.6(c) 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); and
  - 5) Inspector name and signature.
- (h) 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(m) 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:

- (a) One (1) transmix storage tank, identified as Tank T-6, with a maximum capacity of 46,859 gallons.  
Based on its HAP and VOC emissions, this emission unit is an insignificant activity.
- (b) One (1) gasoline storage tank, identified as Tank 55-5, with a maximum capacity of 1,986,080 gallons.
- (c) One (1) gasoline storage tank, identified as Tank 55-11, with a maximum capacity of 2,125,704 gallons.
- (d) One (1) gasoline storage tank, identified as Tank 80-12, with a maximum capacity of 3,200,148 gallons.
- (e) One (1) gasoline storage tank, identified as Tank 80-13, with a maximum capacity of 3,204,726 gallons.
- (f) One (1) gasoline storage tank, identified as Tank 80-14, with a maximum capacity of 3,203,298 gallons.

### 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 T-6, 55-5, 55-11, 80-12, 80-13, and 80-14 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:
  - i. the cover, lid, or seal is in the closed position at all times except when in actual use;
  - ii. automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supporters; and
  - iii. 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.

Condition (a) satisfies the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110, Subpart K) requirement for storage tanks 80-12, 80-13, and 80-14 storing petroleum liquids with a true vapor pressure not greater than 570 mmHg (11.1 psia). Pursuant to 40 CFR Part 60.112, The Permittee shall not store any petroleum liquid with a true vapor pressure greater than 570 mmHg (11.1 psia) in tanks 80-12, 80-13, and 80-14 unless the storage vessel is equipped with a vapor recovery system or its equivalent.

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

**D.2.3 Monitoring**

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The Permittee shall conduct a quarterly inspection of storage tanks T-6, 55-5, 55-11, 80-12, 80-13, and 80-14 for visible holes, tears, or other openings in the seal or any seal fabric or materials. The inspections required in this condition can be conducted through roof hatches.

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

**D.2.4 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.1(b), the Permittee shall maintain records of results of the quarterly inspections required in condition D2.4.
- (b) Pursuant to 326 IAC 12, 40 CFR Part 60.110 and 326 IAC 8-4-3 the owner/operator of storage tanks T-6, 55-5, 55-11, 80-12, 80-13, and 80-14 shall maintain the following records:
  - i. petroleum liquid stored,
  - ii. the period of storage, and
  - iii. the maximum true vapor pressure of that liquid during the respective storage period.
- (c) 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 and 0.8 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)]**

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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  
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION  
AIR QUALITY MANAGEMENT SECTION  
DATA COMPLIANCE**

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

Source Name: Marathon Oil Company  
Source Address: 1304 Olin Avenue, Indianapolis, Indiana 46224  
Mailing Address: 1304 Olin Avenue, Indianapolis, Indiana 46224  
FESOP No.: F097-5515-00078

**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:



State Form 47741 (5-96)

**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: Marathon Oil Company  
Source Address: 1304 Olin Avenue, Indianapolis, Indiana 46224  
Mailing Address: 1304 Olin Avenue, Indianapolis, Indiana 46224  
FESOP No.: F097-5515-00078

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:<br>(ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month) |
| Determination Period for this Parameter:<br>(ex: 365-day rolling sum, fixed monthly rate)   |
| <b>9</b> Permit Has No Rate Limitations for this Parameter.   |
| Content Restriction for this Parameter:<br>(ex: maximum of 40% VOC in inks, 0.5% sulfur content)  |
| Demonstration Method for this Parameter:<br>(ex: MSDS, Supplier, material sampling & analysis)  |
| <b>9</b> 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 Quarterly Report**

Source Name: Marathon Oil Company  
 Source Address: 1304 Olin Avenue, Indianapolis, Indiana 46224  
 Mailing Address: 1304 Olin Avenue, Indianapolis, Indiana 46224  
 FESOP No.: F097-5515-00078  
 Facility: Loading Rack  
 Parameter: Gasoline throughput  
 Limit: Total gasoline throughput less than 280,000,000 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:

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**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:** Marathon Oil Company, Speedway Terminal  
**Source Location:** 1304 Olin Ave., Indianapolis, Indiana 46224  
**County:** Marion  
**SIC Code:** 5171  
**Operation Permit No.:** F097-5515-00078  
**Permit Reviewer:** Patrick Coughlin

The Environmental Resources Management Division (ERMD) have reviewed a Federally Enforceable State Operating Permit (FESOP) application from Marathon Oil Company, Speedway Terminal relating to the operation of a petroleum products distribution terminal.

**Permitted Emission 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) Operating Permit from City of Indianapolis Environmental Resource Management Division for the following units:

- (a) One (1) petroleum products loading rack, identified as Loading Rack, with a carbon absorber vapor recovery system, five (5) islands, 33 meters, and a maximum loading capacity of 525,000,000 gallons per year. The fugitive emissions, identified as F1, associated with this unit come from valves, loading arms, meters, pumps, etc. This facility was initially constructed in 1944 and modified in 1990 with the addition of a fifth Island.
- (b) One (1) transmix storage tank, identified as Tank T-6, with a maximum capacity of 46,849 gallons. Based on its HAP and VOC emissions, this emission unit is an insignificant activity. This Tank was constructed prior to 1973.
- (c) One (1) gasoline storage tank, identified as Tank 55-5, with a maximum capacity of 1,986,080 gallons. This tank was constructed in 1944.
- (d) One (1) gasoline storage tank, identified as Tank 55-11, with a maximum capacity of 2,125,704 gallons. This tank was constructed in 1971.

- (e) One (1) gasoline storage tank, identified as Tank 80-12, with a maximum capacity of 3,200,148 gallons. This tank was constructed in 1974.
- (f) One (1) gasoline storage tank, identified as Tank 80-13, with a maximum capacity of 3,204,726 gallons. This tank was constructed in 1974.
- (g) One (1) gasoline storage tank, identified as Tank 80-14, with a maximum capacity of 3,203,298 gallons. This tank was constructed in 1974.

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

The source also consists of the following unpermitted activities:

- (1) Annual tank truck vapor tightness testing operations, identified as Garage.

### **Insignificant Activities**

The source also includes the following insignificant activities:

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
- (3) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.
- (4) A petroleum fuel, other than gasoline, dispensing facility, having storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (5) The following VOC and HAP storage containers: (a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.  
(b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (6) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (7) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (8) Closed loop heating and cooling systems.
- (9) Groundwater oil recovery wells.

- (10) Activities associated with the treatment of wastewater streams with oil and grease content less than or equal to 1% by volume.
- (11) Process vessels degassing and cleaning for internal repairs.
- (12) Paved and unpaved roads and parking lots with public access.
- (13) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities are not associated with the production process.
- (14) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (15) Activities with VOC emissions less than 3 lbs per hour or 15 lbs per day. These include the following:
  - (a) Tanks 20-1 through 20-4, 20-7, 20-9, 55-10, and RB 8-1. All holding No.2 fuel oil.
  - (b) Tank 55-8, holding aviation fuel.
  - (c) Tanks T-6, AA 8-1, AA 10-2, 3-15, AA 30-2 and AA 30-1. All holding gasoline additive.
  - (d) Tank AA 4-3, holding fuel oil additive.
  - (e) Tank AA 1-5, holding jet fuel de-icer.
  - (f) One (1) underground tank holding oil and water mix from an oil/water separator.

### **Existing Approvals**

This source has been operating under the following approvals:

- (1) Operating Permit issued October 13, 1993
- (2) Construction Permit 90-0078-01 issued for the reactivation of the fifth loading rack.

### **Enforcement Issue**

- (a) IDEM and ERMD are aware that the following equipment has been operated without prior to receipt of the proper permit:
  - (1) Annual tank truck vapor tightness testing operations, identified as Garage.

- (b) IDEM and ERMD are reviewing this matter and will take appropriate action. This proposed permit will also satisfy the requirements of the construction permit rules.

### Recommendation

The staff recommends to the Commissioner 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 18, 1996.

### Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations. (pages 1 and 2 in Appendix A)

### Potential Emissions

PTE is defined as "the maximum capacity of a stationary source to emit a pollutant under its physical and operational design."

| Pollutant       | PTE (tons/year) |
|-----------------|-----------------|
| PM              | 0.0             |
| PM-10           | 0.0             |
| SO <sub>2</sub> | 0.0             |
| VOC             | 2,137           |
| CO              | 0.0             |
| NO <sub>x</sub> | 0.0             |

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

See Appendix A: Emissions Calculations for detailed calculations. (page 1 in Appendix A)

| HAP                    | PTE (tons/year) |
|------------------------|-----------------|
| Hexane                 | >10             |
| Benzene                | >10             |
| Toluene                | >10             |
| MTBE                   | >10             |
| Xylenes                | >10             |
| Ethylbenzene           | >10             |
| 2,2,4 Trimethylpentane | >10             |
| TOTAL HAPs             | >25             |

See Appendix A: Emissions Calculations for detailed calculations. (page 2 in Appendix A)

- (a) The potential emissions (as defined in the Indiana Rule) of VOC is greater than 100 tons

per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

and

- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is greater than or equal to 10 tons/year and the potential emissions (as defined in Indiana Rule) of a combination of HAPs is greater than or equal to 25 tons/year. Therefore, the source is subject to the provisions of 326 IAC 2-7-1.
- (c) 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 emissions 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 95 tons per year, consisting of:
  - (i) 87.55 tons per year for the significant activities; and
  - (ii) 7.25 tons per year for the insignificant activities.
- (b) The source has accepted a limit on the potential to emit of 9 tons per year for any single HAP and 24 tons per year for any combination of HAPs. Limiting the VOC emissions to less than 95 tons per 356 day period of satisfies the requirement to limit HAP emissions to less than 9 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.

| Limited Potential to Emit                                |       |   |
|--|-------|---|
| Process/Facility   | VOC   | HAPs  |
| Loading Rack   | 40.89 | 4.64  |
| Storage Tanks (T-6, 55-5, 55-11, 80-12, 80-13 and 80-14) | 25.10 | 4.88  |
| Garage   | 5.04  | 0.88  |
| Fugitive Emissions (F1)                                  | 16.52 | 0.19  |
| Insignificant Activities*                                | 7.25  | 0.45  |
| Total Emissions  | 94.80 | 11.37 for a combination of HAPs<br>6.40 for highest individual HAP (MTBE) |

\*Composed of the remaining storage tanks and fugitives for flanges and valves

**County Attainment Status**

The source is located in Marion.

| Pollutant       | Status (attainment or unclassifiable/severe, moderate, marginal, or maintenance nonattainment) |
|-----------------|--|
| TSP             | nonattainment  |
| PM-10           | attainment   |
| SO <sub>2</sub> | attainment   |
| VOC             | attainment   |
| CO              | attainment   |
| NO <sub>2</sub> | unclassifiable   |

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standard. Marion County has been designated as attainment for ozone

### Federal Rule Applicability

The storage tanks 80-12, 80-13, and 80-14 are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110, Subpart K). This NSPS does not apply to the remaining tanks at the source due to capacity and/or date of construction.

The Loading Rack, is subject to the requirements of New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.500, Subpart XX) since the rack under went a modification pursuant to 40 CFR Part 60.14 after the effective date of December 8, 1980. The VOC emissions are limited to 80 milligram per liter since the rack was equipped with an existing vapor control system at the time of the modification.

This source is not subject to the National Emission Standard for Hazardous Air Pollutants for Gasoline Distribution because it is not a major source of HAPs as defined by the rule.

### State Rule Applicability

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

Pursuant to this rule, the amount of volatile organic compounds emitted is limited to 99 tons per year, the amount of any single HAP emitted is limited to 9 tons per year, and the amount of any combination of HAPs emitted is limited to 24 tons per year. To comply with these limits, Marathon Oil Company, Speedway Terminal has accepted the following conditions:

- (a) The maximum throughput at the Loading Rack of all products shall be limited to 525,000,000 gallons per year. This maximum throughput shall be composed of a maximum of 280,000,000 gallons of gasoline per year. The remaining 245,000,000 gallons per year shall be composed of kerosene and No.2 fuel oil.
- (b) The VOC emissions from the vapor recovery unit on the Loading Rack shall be limited to 35 milligrams per liter of gasoline (0.292 lbs per 1000 gals) outlet concentration.

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

This source is subject to the requirements of 326 IAC 8-4-3 because the storage capacities of

storage tanks T-6, 55-5, 55-11, 80-12, 80-13, and 80-14 are greater than 39,000 gallons and are storing volatile organic liquids with a true vapor pressure greater than 10kPa (1,52 psia). These tanks are internal floating roof tanks which complies with 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 1-2-8. The VOC emissions from the bulk gasoline terminal source loads gasoline into trucks VOC emissions are limited to 80 milligrams per liter of gasoline dispensed. The FESOP limitation of 35 milligrams per liter satisfies this requirement. The VOC emissions from the loading of gasoline tanker trucks shall be controlled by either a carbon adsorber or a flare as a backup unit.

#### 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems: Records)

This source is subject to the requirements of 326 IAC 8-4-9 because the source operates a vapor collection system and is subject to the requirements of 326 IAC 8-4-4.

### **Compliance Monitoring**

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 compliance monitoring requirements applicable to the operation of the VRU and the vapor combustor are as follows:

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

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

The Permittee shall conduct a daily inspection of the carbon bed pressure strip chart records for any deviations in the carbon bed regeneration cycle time mentioned above since the daily last inspection.

The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the regeneration cycle is outside of the above mentioned range for any one reading.

- (b) The permittee shall install and maintain a monitor to detect the presents of a flame at the flare tip. The presents of a flame at the flare tip shall be monitored at all time when the vapors are being vented to the flare. The monitor shall be equipped with an automatic alarm to alarm when the presents of a flame is not detected when the vapors are being vented to the flare.

The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the visible emissions notations are abnormal for any one observation.

- (c) Each calendar month, the vapor collection system, the vapor control system, and each loading rack that loads gasoline tank trucks shall be inspected 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. [40 CFR Part 60.502(j)] [326 IAC 8-4-9(d)]

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.

### **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 toxic on the Office of Air Management (OAM) FESOP Application GSD-08.

This source will emit levels of air toxicities 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 petroleum products distribution terminal will be subject to the conditions of the attached proposed FESOP No. F097-5515-00078.

Table (1)

|  |  |
|--|--|
| <b>Stack/Vent ID:</b>                      | SV1  |
| <b>Stack/Vent Dimensions:</b>              | Ht: 18 ' Dia: 8" Temp: Ambient Flow: 1070 cfm  |
| <b>Emission Unit:</b>                      | Loading Rack   |
| <b>Date of Construction:</b>               | 1945, 1988 (vapor recovery unit)   |
| <b>Alternative Scenario:</b>               | In the event of an extended breakdown or maintenance of the vapor recovery unit, the source will temporarily operate a trailer mounted vapor combustor to control emissions from Loading Rack. This unit is guaranteed by the manufacturer to control VOC emissions to 35 mg/l of gasoline loaded. The unit will vent to stack/vent S/V2 |
| <b>Pollution Control Equipment:</b>        | Vapor recovery unit (VRU)  |
| <b>General Description of Requirement:</b> | volatile organic compounds   |
| <b>Numerical Emission Limit:</b>           | 95 tons/year, 35 mg VOC/ l of gasoline loaded (from VRU)   |
| <b>Numerical Throughput Limit:</b>         | 525,000,000 gallons/year of petroleum products with a maximum of 280,000,000 gallons/year of gasoline  |
| <b>Regulation/Citation:</b>                | 326 IAC 2-8-4  |
| <b>Compliance Demonstration:</b>           | record keeping of product throughput at loading rack and of regeneration of absorber bed on the vapor recovery unit  |
| <b>PERFORMANCE TESTING</b>                 | not applicable to this facility  |
| <b>Parameter/Pollutant to be Tested:</b>   |  |
| <b>Testing Method/Analysis:</b>            |  |
| <b>Testing Frequency/Schedule:</b>         |  |
| <b>Submittal of Test Results:</b>          |  |
| <b>COMPLIANCE MONITORING</b>               |  |
| <b>Monitoring Description:</b>             | N/A  |
| <b>Monitoring Method:</b>                  | throughput invoices  |
| <b>Monitoring Regulation/Citation:</b>     | 326 IAC 2-8-5(a)(1)  |
| <b>Monitoring Frequency:</b>               | daily  |
| <b>RECORD KEEPING</b>                      |  |
| <b>Parameter/Pollutant to be Recorded:</b> | VOC  |
| <b>Recording Frequency:</b>                | daily  |
| <b>Submittal Schedule of Reports:</b>      | quarterly  |
| <b>REPORTING REQUIREMENTS</b>              |  |
| <b>Information in Report:</b>              | product throughput at loading racks and frequency of bed regeneration at the VRU   |
| <b>Reporting Frequency/Submittal</b>       | quarterly for product throughput   |
| <b>Additional Comments:</b>                | Records of bed regeneration do not need to be submitted to IDEM, OAM.  |

**Indianapolis Environmental Resources Management Division  
Air Quality Management Section**

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

**Marathon Oil Company - Speedway Terminal  
1304 Olin Avenue  
Indianapolis, Indiana 46224**

F097-5515-0078

On November 6, 1996, the Environmental Resources Management Division (ERMD) had a notice published in the Indianapolis Star Newspaper, Indianapolis, Indiana, stating that Marathon Oil Company - Speedway Terminal 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) Addition of New Source Performance Standard (NSPS) 40 CFR Part 60.500, Subpart XX, requirements to condition C.1.1 - This regulation applies since the source underwent a modification to the loading rack which increase the potential emissions of VOCs after the effective date of the regulation. Condition D.1.1 contains the NSPS requirements.

- b) Removal (identified as condition D.1.3 in previous permit) of Leak Testing from Transports and Vapor Recovery Unit condition. The requirements of this condition are satisfied by the NSPS requirements and are incorporated into condition D.1.1.
- c) Addition a new Condition D.1.2 requiring this facility to have a Preventive Maintenance Plan.
- d) Removal (identified as condition D.1.3 in previous permit) of the HAP emissions limitation from section D- Based on a IDEM memorandum fro Ed Stresino, the VOC limit of 99 tons per 365 day period will satisfy the requirement to limit the HAP emissions to less than 9 tons for a single HAP and 24 tons for any combination of HAPs. As a general requirement condition C.1 limits HAP emissions source wide to less than the major source thresholds.
- e) Removal of the Opacity limit - The opacity limit was moved to Section C of the permit.
- f) Addition of general design and operating requirement for the trailer mounted vapor combustor. ERMD is requiring that the Permittee meet specific design and operation parameters to ensure that the flare is operated in a manner which assures compliance with the VOC limit of 35 milligrams per liter.
- g) Addition of a Compliance Determination Section which includes requirements to stack test the VRU and procedures to follow for documenting compliance with 326 IAC 8-4-9 for gasoline tanker trucks.
- h) Modification to the Compliance Monitoring provisions which includes; revisions to compliance monitoring of the VRU regeneration cycle time monitoring to allow for variations during slack times, addition of compliance monitoring provisions for the flare, and monthly leak inspection of the loading rack VRU and collection system.
- i) Modification to recordkeeping requirement have been expanded to include NSPS requirement, documentation of compliance monitoring provisions and tanker truck test certifications and documentation of results for any inspection required by the Preventive Maintenance Plan.
- j) Section D.3 was added to include applicable requirement for insignificant emitting activities.

The following table lists the revised limited Potential to Emit.

| <b>Limited Potential to Emit</b>                         |            |             |
|--|------------|-------------|
| <b>Process/Facility</b>                                  | <b>VOC</b> | <b>HAPs</b> |
| Loading Rack   | 40.89      | 4.64        |
| Storage Tanks (T-6, 55-5, 55-11, 80-12, 80-13 and 80-14) | 25.10      | 4.88        |
| Garage   | 5.04       | 0.88        |
| Fugitive Emissions (F1)                                  | 16.52      | 0.19        |
| Insignificant Activities*                                | 7.25       | 0.45        |

|                 |       |  |
|-----------------|-------|--|
| Total Emissions | 94.80 | 11.37 for a combination of HAPs<br>6.40 for highest individual HAP<br>(MTBE) |
|-----------------|-------|--|

\*Composed of the remaining storage tanks and fugitives for flanges and valves

During the Public Comment Period ERMD received the following comments from Marathon Petroleum Company:

1. Condition D.1.1 (b) requires that the carbon bed be regenerated once every fifteen minutes during loading. During periods of active loading this is acceptable. However, to conserve energy, after the "last" truck the unit cycles and goes into an idle mode. The unit is programmed not to regenerate again until five trucks have loaded. Therefore this condition needs to be rewritten: "...shall be regenerated every 15 minutes during active loading or every 5 trucks during slack periods." The beds are regenerated by pulling a vacuum on them and as noted in D.1.8, a continuous record is kept of carbon bed pressure indicating the regeneration frequency. This could be matched against loading records to verify compliance.

ERMD has revised this conditions as requested.

2. Condition D.1.4 requires compliance with 326 IAC 5-1-2, visible emissions limitation. It is our contention that since this facility only emits VOCs and that under normal operation there are no source of combustion, this rule would not apply. The exception is during operation of the portable flare, when opacity is appropriate.

It is our understanding that the opacity regulation is a generally applicable requirement and as such has been moved to section C of the permit.

3. Condition D.1.5(b) also requires regeneration every 15 minutes. See the comments on Condition D.1.1(b) above.

See the response to comment #1

4. Condition D.1.7 requires daily monitoring of visible emissions. Since there are no visible emissions from the tanks or carbon adsorption VRU, this requirement should be dropped.

ERMD agrees and has removed the requirements to conduct daily visible emissions notations in exchange for the requirement to install and operate a continuous sensor for detecting the presents of a flame at the flare tip.

5. Condition D.1.8 rewrite the first sentence to read: A continuous record of carbon adsorber bed pressure shall be kept, showing the frequency of regeneration". As noted above, the 15 minute regeneration cycle doesn't always apply and this statement should cover all situation.

See the response to comment #1

On November 3, 1997 ERMD received the following additional comments on the revised FESOP from Marathon Oil Company:

- 1) Marathon Oil company requests that the emission unit naming convention be changed as follows:

EU1 changed to Loading Rack  
EU2 changed to Tank 55-5  
EU3 changed to Tank 55-11  
EU4 changed to Tank 80-12  
EU5 changed to Tank 80-13  
EU6 changed to Tank 80-14

ERMD has incorporated the name changed into the FESOP and TSD

- 2) Condition D.1.6(a) requires that we match loading records against carbon bed pressure records on a daily basis to verify the volume of gasoline loaded during slack periods (when the vapor recovery unit is not regenerating continuously). The vapor recovery unit is controlled by a PLC that counts the number of trucks that have commenced loading since the last regeneration. If any loading has occurred, the 15 minute regeneration cycle time continues. If there has been no truck activity, the VRU goes into idle mode to conserve energy. If the VRU does not restart after five trucks have hooked up, the loading rack is automatically shut down until an attendant can investigate the problem. Terminal personnel indicate that the idle mode of operation is infrequent due to the high level of loading activity that occurs at the facility. The process is automatic and other than the pressure recorder on the carbon beds, no other record is kept of when the unit is idle or active.

Loading records are kept by a different computer billing and inventory purposes. While it is possible to generate a daily record of loads as a function of time, selection of the appropriate time from the pressure records, generation of the loading records, and matching the records by hand on a daily basis would be very tedious. Since the VRU operation is automated, we request that ERMD reconsider the requirement that this matching take place on a daily basis. Our preference is to drop this monitoring requirement or reduce it to a spot check during an inspection.

ERMD understands Marathon Oil Companies concern over condition D.1.6(a) and has revised this condition as follows:

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

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

*The Permittee shall conduct a daily inspection of the carbon bed pressure strip chart records for any deviations in the carbon bed regeneration cycle time mentioned above since the daily last inspection.*

*The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the regeneration cycle is outside of the above mentioned range for any one reading.”*

- 3) Marathon wishes to clarify what operations are allowed during a malfunction of the Vapor Recovery unit. It is our understanding that the emissions limit in D.1.1(k) is a technology based standard, therefore B.1.4(g)(1) applies. Therefore as long as Marathon meets the requirements of

this paragraph and notification requirements in B.14(b), we may continue to load gasoline tank trucks while repairs are being made to the vapor recovery unit.

ERMD agrees that the emissions limit established in condition D.1.1(k) is a technology based standard and as such condition B.1.4(g)(1) applies.

- 4) Condition D.1.8 requires quarterly reporting of deviations from the throughput limits found in condition D.1.1(m). However, the form provided in the draft version on page 40 is titled FESOP Monthly Report. Please modify this form to indicate quarterly reporting.

ERMD has revised the reporting form to indicate quarterly reporting.

- 5) Please modify Condition D.2.3 to indicate that the quarterly inspection of these internal floating roof storage tanks can be made through the roof hatches.

ERMD has revised condition D.2.3 to read as follows;

*"The Permittee shall conduct a quarterly inspection of storage tanks T-6, 55-5, 55-11, 80-12, 80-13, and 80-14 for visible holes, tears, or other openings in the seal or any seal fabric or materials. The inspections required in this condition can be conducted through roof hatches."*

- 6) Several of the forms require for certifications and deviation reporting incorrectly identify the company as Marathon Petroleum Co. instead of Marathon Oil Co. (pages 37-39)

ERMD has revised these forms with the correct company name.

- 7) The Technical Support Document incorrectly states that the loading rack has 19 meters; there are 33 meters in total.

ERMD has made this correction to the TSD.

- 8) Several typographical errors were noted in the draft. Please change "tainer" to "trailer" in A.2(a) and D.1, "presents" to "presence" in D.1.6(b) and D.1.7(g), and "polit" to "pilot" in D.1.1(l)(2). Also, the record keeping requirement in D.1.7(g) should refer to inspections required in condition D.1.6(c), not D.1.5(c).

ERMD has corrected these typographical errors.

Emissions From Loading Rack and VRU

Loading Loss Emissions Calculations

$$\begin{aligned}
 UE &= (L/1000 \times GTP)/2000 \\
 CEV &= EL \times GTG \times (CP/CG) \\
 KFE &= ((GTK \times (Lk/1000))/2000) \\
 GFE &= ((GTG \times (Lg/1000))/2000) \times (1-CE)
 \end{aligned}$$

Where:

GTG = Limited throughput of gasoline per year (Permit limit, gallons per 365 day period)  
 GTD = Limited throughput of distillate & kerosene per year  
 GTP = Potential throughput of gasoline, distillate and kerosene per year  
 EL = emissions limitation for VOC from the outlet of the VRU, mg/l  
 CE = capture efficiency for VOCs (see note below)  
 CG = 0.2642 gal equals 1 liter  
 CP = 2.2046 x 10<sup>-6</sup> pounds equal 1 milligram  
 Lg = loading loss, pounds per 1000 gallons of gasoline loaded  
 Lk = loading loss, pounds per 1000 gallons of kerosene loaded (distillate 0.014 lbs/1000 gal)

| Data Inputs    |  |
|----------------|--|
| 280,000,000.00 |  |
| 245,000,000.00 |  |
| 525,000,000.00 |  |
| 35             | NSPS Limit   |
| 98.70%         |  |
| 0.2642         |  |
| 2.2046E-06     |  |
| 8.00           | AP-42 Table (submerged loading vapor balance service )   |
| 0.016          | AP-42 Table (submerged loading deticated normal service) |

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

|          |
|----------|
| 2,100.00 |
| 40.89    |
| 1.96     |
| 14.56    |

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

|       |
|-------|
| 57.41 |
|-------|

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%

Storage Tank Emissions

| Storage Tanks ID | Product Stored | Type of Tank           | Tank Volumes (Ft3) | Tank Volumes (gal) | Date Installed |
|------------------|----------------|------------------------|--------------------|--------------------|----------------|
| 55-5             | Gasoline       | Internal Floating Roof | 314,286            | 2,085,384          | 1944           |
| 55-11            | Gasoline       | Internal Floating Roof | 305,486            | 2,125,704          | 1971           |
| 80-12            | Gasoline       | Internal Floating Roof | 377,929            | 3,200,148          | 1974           |
| 80-13            | Gasoline       | Internal Floating Roof | 456,343            | 3,204,726          | 1974           |
| 80-14            | Gasoline       | Internal Floating Roof | 456,343            | 3,203,298          | 1974           |

The US EPA TANKS2 program was used to estimate the standing and withdrawl 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 withdrawl loss (lbs/1000 gallons)

| Storage Tanks ID | Tank Volumes (gal) | Turnovers | Throughput (Gal) | Withdrawl Loss | Withdrawl Loss Lbs/1000 gal | Standing Loss |
|------------------|--------------------|-----------|------------------|----------------|-----------------------------|---------------|
| 55-5             | 2,085,384          | 41        | 85,500,744       | 175            | 0.002049                    | 12,410        |
| 55-11            | 2,125,704          | 41        | 87,153,864       | 170            | 0.001949                    | 9,307         |
| 80-12            | 3,200,148          | 41        | 131,206,068      | 220            | 0.001677                    | 17,790        |
| 80-13            | 3,204,726          | 41        | 131,393,766      | 220            | 0.001677                    | 11,203        |
| 80-14            | 3,203,298          | 41        | 131,335,218      | 220            | 0.001677                    | 8,223         |
|                  |                    |           |                  | 1,006          |                             | 49,626        |

|  |                |
|--|----------------|
| Maximum Gasoline throughput (gal/yr)           | 280,000,000.00 |
| Maximum withdrawl loss (lbs/1000 gal)          | 0.002049       |
| Maximum emissions from Withdrawl Loss (lbs/yr) | 573.65         |
| Standing Loss for Gasoline, (lbs/yr)           | 49,626.14      |
| Total Emissions form Gasoline (tons/yr)        | 25.10          |

## Miscellaneous/Insignificant Emitting Activities

| Insignificant Emitting Activities | Potential Emissions (tons/yr) |
|-----------------------------------|-------------------------------|
| Fugitive (Flanges and Valves)     | 1.06                          |
| Degreasing Operation              | 0.16                          |
| 20-2                              | 0.11                          |
| 55-8                              | 0.86                          |
| 20-4                              | 0.3                           |
| 20-7                              | 0.29                          |
| 55-10                             | 0.87                          |
| 20-1                              | 0.3                           |
| 20-3                              | 0.37                          |
| 20-9                              | 0.31                          |
| T-6                               | 0.51                          |
| AA-8-1                            | 0.19                          |
| AA-10-2                           | 0.19                          |
| AA-4-3                            | 0.29                          |
| AA-1-4                            | 0                             |
| AA-1-5                            | 0.03                          |
| AA-1-6                            | 0.06                          |
| RB-8-1                            | 0                             |
| WA-12-1                           | 0.05                          |
| WA-12-2                           | 0.05                          |
| 3-15 Retail Addit.                | 0                             |
| AA30-1 Retail Addit.              | 0                             |
| AA30-2 Retail Addit.              | 0                             |
| O/W Separator                     | 1.25                          |
| Total Emissions                   | 7.25                          |

| Miscellaneous Significant Activity | Potential Emissions (tons/yr) |
|------------------------------------|-------------------------------|
| Garage (Tank Degasing)             | 5.04                          |

|                                  | gal/yr    | tons of VOC per year |
|----------------------------------|-----------|----------------------|
| Unlimited Throughput             | 525000000 | 2100.00              |
| Gasoline Throughput              | 280000000 | 86.65                |
| Distillate & Kerosene Throughput | 245000000 | 7.99                 |

| HAP                    | Cass Number | Percentage by weight of VOC |            | Potential | Limited PTE |
|------------------------|-------------|-----------------------------|------------|-----------|-------------|
|                        |             | Gasoline                    | Distillate |           |             |
| Hexane                 | 110-54-3    | 1.60%                       | 0.01%      | 33.6      | 1.52        |
| Benzene                | 71-43-2     | 0.90%                       | 0.02%      | 18.9      | 0.86        |
| Toluene                | 108-88-3    | 1.30%                       | 0.26%      | 27.3      | 1.24        |
| 2,2,4 Trimethylpentane | 540-84-1    | 0.80%                       | --         | 16.8      | 0.76        |
| Xylene                 | 1330-20-7   | 0.50%                       | 0.69%      | 10.5      | 0.5         |
| Ethylbenzene           | 100-41-4    | 0.10%                       | 0.04%      | 2.1       | 0.1         |
| MTBE                   | 1634-04-4   | 11.90%                      | --         | 249.9     | 6.06        |

\*represents combination of HAP emissions from all storage tanks, truck degassing, fugitive sources, and the loading rack.

Limited PTE HAP emissions estimates were provided by the applicant.

## Source Wide Emissions

| Facilities  | Limited PTE<br>(tons/yr) | Potential Emissions<br>(tons/yr) |
|---|--------------------------|----------------------------------|
| Gasoline tanks  | 25.10                    | 25.10                            |
| Fugitive for loading rack and VRU (Gasoline & Distillate) | 16.52                    | 2,100.00                         |
| VRU outlet (35 mg/l , Gasoline throughput)                | 40.89                    | NA                               |
| Insignif(Tank,Flange&Valves)                              | 7.25                     | 7.25                             |
| Miscellaneous (Degasing trucks)                           | 5.04                     | 5.04                             |
| Total Emissions   | 94.80                    | 2,137.39                         |