

# FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

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

**Amoco Oil Company  
2500 North Tibbs Avenue  
Indianapolis, Indiana 46222**

(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.: F097-5563-00076	
Issued by: Robert F. Holm, Ph.D., Administrator ERMD	Issuance Date:

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a bulk gasoline terminal.

Responsible Official: Mr. Dave Cockrum  
Source Address: 2500 North Tibbs Avenue, Indianapolis, Indiana, 46222-0278  
Mailing Address: P.O. Box 22278, Indianapolis, Indiana 46222  
SIC Code: 5171  
County Location: Marion  
County Status: Nonattainment for total suspended particulate. Attainment for sulfur dioxide, carbon monoxide, lead, nitrogen oxides, ozone and unclassified for PM<sub>10</sub>.  
Source Status: Federally Enforceable State Operating Permit  
Minor source under the PSD and Emissions Offset Regulations

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

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

- (1) One (1) loading rack for dispensing of petroleum product, with one (1) carbon adsorber, identified as V10, for control of volatile organic compounds. Loading rack installed in 1993.
- (2) Storage tank #2, equipped with an external pontoon floating roof with a dome, 672,000 gallon storage capacity, used to store gasoline product, and constructed in 1942.
- (3) Storage tank #3, equipped with an external pontoon floating roof with a dome, 672,000 gallon storage capacity, used to store gasoline product, and constructed in 1942.
- (4) Storage tank #6, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store gasoline product, and constructed in 1941.
- (5) Storage tank #7, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store gasoline product, and constructed in 1941.
- (6) Storage tank #8, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store gasoline product, and constructed in 1942.
- (7) Storage tank # 1, equipped with a fixed roof, 1,365,000 gallons storage capacity, used to store distillate product, and constructed in 1941.
- (8) Storage tank # 4, equipped with a fixed roof, 1,365,000 gallons storage capacity, used to store distillate product, and constructed in 1941.
- (9) Storage tank # 5, equipped with a fixed roof, 1,365,000 gallons storage capacity, used to store distillate product, and constructed in 1941.

- (10) Storage tank # 11, equipped with a fixed roof, 3,360,000 gallons storage capacity, used to store distillate product, and constructed in 1970.

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

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This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- 1) 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.
- 2) A gasoline fuel transfer or dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- 3) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- 4) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluid.
- 5) Filling drums, pails or other packaging containers with lubricating oils, waxes, and grease.
- 6) Cleaners and solvents characterized as follows:
  - A) having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100°F) or ;
  - B) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20 degrees C (68°F);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- 7) Groundwater oil recovery wells
- 8) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- 9) Process vessels degassing and cleaning to prepare for internal repair.
- 10) Paved and unpaved roads and parking lots with public access.
- 11) 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.
- 12) On-site fire and emergency response training approved by the department
- 13) Filter or coalescer media changeout.
- 14) Laboratory as defined in 326 IAC 2-7-1(20)(C).
- 15) The following facilities with VOC emissions less than 3 pounds per hour or fifteen pounds per day which are not specified in form GSD10(a) of the application:
  - A) Tank 12, 8,000 gallon diesel service tank.
  - B) Tank 13, 1,000 gallon gasoline service tank.
  - C) Oil/Water separator Tank
  - D) Tank 15, 2,000 gallon pump off tank.
  - E) Tank 16, 1,100 gallon heater oil tank for shop.
  - F) Tank 17, 8,000 gallon furnace oil UST.
  - G) Tank 18, 1,000 gallon furnace oil UST.
  - H) Tank 19, 500 gallon oil recycling tank.
  - I) Tank 20, 8,200 gallon OGA additive tank.
  - J) Tank 21, 2,000 gallon VRU knock out tank.
  - K) Tank 22, 1,000 gallon groundwater tank.

- L) Tank 23, 1,000 gallon oil recovery tank.
- M) Air Stripper
- N) Other Miscellaneous Activities (loading, refueling, lab and maintenance)

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)]

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The 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.

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**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)]**

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- (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]**

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

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Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification

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

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

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

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

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

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

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

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

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

and

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

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

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

request, to public review.

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

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

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

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

**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).
- (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. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

#### 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 not allow fugitive dust to escape beyond the property line or boundaries of

the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**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 unit vented to the control equipment is 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 one (1) 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 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

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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.14 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.15 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 reserve(s) the right to utilize enforcement activities to resolve the non-compliant stack test(s).
- (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.16 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]**

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- (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  
Technical Support and Modeling 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.17 Monitoring Data Availability

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

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

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and 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
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate corrective actions when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions taken as a result of each deviation must be clearly identified in such reports.
- (g) 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.20 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) loading rack for dispensing of petroleum product, with one (1) carbon adsorber, identified as V10, for control of volatile organic compounds. Loading rack installed in 1993.

### 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]

- (a) During the loading of distillate, the loading rack and trucks receiving distillate fuels are not required to be routed to the vapor collection system and VRU, if the truck compartments being loaded were immediately previously in distillate service.
- (b) 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)]
- (c) 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)]
- (d) 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)]
- (e) 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)]
- (f) 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)]
- (g) 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)]
- (h) 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)]
- (i) 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)]

- (j) 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)]
- (k) Loading of gasoline tank trucks shall be restricted to the use of submerged fill.
- (l) Pursuant to 40 CFR Part 60.502(b) the VOC emission to the atmosphere from the carbon absorber vapor recovery unit on the truck loading rack (EU1) 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).
- (m) The VOC emissions from the loading rack shall not exceed the limit specified in conditions A or B. The selection of record keeping described by A or B shall be made by the Permittee and shall be changed only once. A Permit Amendment is required to return to the initial record keeping basis. Compliance with either condition A or B below shall make the requirements of 326 IAC 2-7 (Part 70 Operating Permit Program) and 40 CFR Part 63.420 Gasoline Distribution MACT Regulation not applicable.
  - A) Pursuant to 326 IAC 2-8-4(1) the amount of gasoline product loaded at the terminal shall be limited to less than 400,000,000 gallons per 365 day period rolled daily and the amount of distillate product loaded at the terminal shall be limited to 270,000,000 gallons per 365 day period, rolled daily. These limits are equivalent of 82 tons of VOC per 365 day period.
  - B) Pursuant to 326 IAC 2-8-4(1) the amount of gasoline product loaded at the terminal shall be limited to less than 365,500,000 gallons per twelve (12) consecutive month period and the amount of distillate product loaded at the terminal shall be limited to 270,000,000 gallons per twelve (12) consecutive month period. These limits are equivalent of 75 tons of VOC per twelve (12) consecutive month period.

#### 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(l), the Permittee shall conduct a stack test for VOCs at the outlet of the Vapor Recovery unit within 18 months 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(h) shall be determined in pursuant to the procedures specified in 40 CFR 503(d). Testing to document compliance with condition D.1.1(h) 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(h) under 326 IAC 2-8-4 and 326 IAC 2-8-5.

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

Compliance with Condition D.1.1(e) 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 (1) 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**

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

- (a) The vapor recovery unit shall be operated at all times when the loading rack is loading gasoline. When operating, the vapor recovery unit shall maintain vacuum on each regenerating cycle, carbon bed temperatures, duct velocities and frequencies of regeneration as recommended according to manufacturers specifications, or as demonstrated by the facility as necessary in order to maintain an emissions rate of 35 mg/l of gasoline loaded.

The Permittee shall monitor and record the vacuum pressure during a regeneration cycle and carbon bed temperatures of the vapor recovery unit at least once per shift when the petroleum loading rack is in operation loading gasoline.

The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the vacuum pressure during the regeneration cycle, and carbon bed temperatures are outside of the ranges recommended according to manufacturer specifications or as demonstrated by the facility as necessary in order to maintain an emissions rate of 35 milligrams of gasoline loaded for any one reading.

Within 30 days of permit issuance the Permittee shall submit, to the addresses listed in Section C - General Reporting Requirements of this permit, the operating ranges for the vacuum pressure during the regeneration cycle and carbon bed temperatures.

- (b) 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 D.1.1(m), the Permittee shall keep records of the daily or monthly amount of gasoline and distillate oil loaded at the terminal depending upon the record keeping selected.
  
- (b) To document compliance with D.1.5, The vapor tightness documentation shall be kept at the terminal in a permanent for available for inspection. The vapor tightness documentation file for each gasoline tank truck loaded at the terminal 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).

The Permittee shall keep documentation of all notifications required under condition D.1.5.

- (c) To document compliance with condition D.1.6(a), the Permittee shall maintain records of the measured carbon bed temperatures and vacuum pressure during a regeneration cycle once per shift. The Permittee shall also keep records of all corrective actions implemented per event.
  
- (d) To document compliance with condition D.1.6(b), the Permittee shall maintain records of each monthly leak inspection required under Condition D.1.6(b). 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.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(m) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the appropriate 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:

- (2) Storage tank #2, equipped with an external pontoon floating roof with a dome, 672,000 gallon storage capacity, used to store gasoline product, and constructed in 1942.
- (3) Storage tank #3, equipped with an external pontoon floating roof with a dome, 672,000 gallon storage capacity, used to store gasoline product, and constructed in 1942.
- (4) Storage tank #6, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store gasoline product, and constructed in 1941.
- (5) Storage tank #7, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store gasoline product, and constructed in 1941.
- (6) Storage tank #8, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store gasoline product, and constructed in 1942.
- (7) Storage tank # 1, equipped with a fixed roof, 1,365,000 gallons storage capacity, used to store distillate product, and constructed in 1941.
- (8) Storage tank # 4, equipped with a fixed roof, 1,365,000 gallons storage capacity, used to store distillate product, and constructed in 1941.
- (9) Storage tank # 5, equipped with a fixed roof, 1,365,000 gallons storage capacity, used to store distillate product, and constructed in 1941.
- (10) Storage tank # 11, equipped with a fixed roof, 3,360,000 gallons storage capacity, used to store distillate product, and constructed in 1970.

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

#### D.2.1 Volatile Organic Compounds

Pursuant to 326 IAC 8-4-3(b), storage tanks 2, 3, 6, 7 and 8 shall meet the following requirements:

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

leg supports or at the manufacturer's recommended setting.

Storage tanks 1, 4, 5, and 11 shall not store any volatile organic liquids with a true vapor pressure greater than 10.5 kilo Pascals (1.52 psia) unless the storage vessel complies with the requirements of the Petroleum Liquid Storage Facilities Regulation 326 IAC 8-4-3.

#### 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

- (a) The Permittee shall visually inspect the following each time the storage vessel 2, 3, 6, 7 and 8 are emptied and degassed:
- (1) The internal floating roof equipped with a closure seal, or seals, for visible holes, tears, or other openings in the seal or any seal fabric or materials.
  - (2) All openings, except stub drains, to ensure they are equipped with proper covers, lids, or seals such that:
    - (A) the cover, lid, or seal is in the closed position at all times except when in actual use;
    - (B) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;
    - (C) 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.
  - (3) The Permittee shall repair discrepancies as necessary so that the tank meets the requirements of 326 IAC 8-4-3(b)(1) before refilling the storage vessel with VOL.
- (b) The Permittee shall visually inspect the internal floating roof and the secondary seal through manholes and roof hatches on the fixed roof at least once every calendar year.

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

#### D.2.4 Record Keeping Requirements

- (a) Pursuant to 326 IAC 8-4-3(d) and the requirements of condition D.2.3, the Permittee shall maintain the following records for storage vessels 2, 3, 6, 7 and 8;
- (1) type of volatile petroleum liquid stored,
  - (2) the maximum true vapor pressure, and
  - (3) the result of all inspections performed on storage vessels.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3 FACILITY OPERATION CONDITIONS

Insignificant emitting activities consisting of the following:

- (a) Cold Degreasing Operations

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

#### D.3.1 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.

State Form 47738 (5-96)

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

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

Source Name: Amoco Oil Company  
Source Address: 2500 North Tibbs Avenue, Indianapolis, Indiana 46222-0278  
Mailing Address: P.O. Box 22278, Indianapolis, Indiana 46222  
FESOP No.: F097-5563-00076

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967

**and**

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

2700 S. Belmont Ave.  
Indianapolis Indiana 46221  
Phone: 317-327-2234  
Fax: 317-327-2274

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

Source Name: Amoco Oil Company  
Source Address: 2500 North Tibbs Avenue, Indianapolis, Indiana 46222-0278  
Mailing Address: P.O. Box 22278, Indianapolis, Indiana 46222  
FESOP No.: F097-5563-00076

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)  
CThe Permittee must notify the ERMD and OAM, within four (4) business hours; and  
CThe Permittee must submit notice in writing or by facsimile to ERMD and OAM within two (2) days, and follow the other requirements of 326 IAC 2-8-12
- 9** 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C)  
CThe Permittee must submit notice in writing within ten (10) calendar days

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:
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If any of the following are not applicable, mark N/A

Page 2 of 2

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

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_

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

Attach a signed certification to complete this report.

**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: Amoco Oil Company  
 Source Address: 2500 North Tibbs Avenue, Indianapolis, Indiana 46222-0278  
 Mailing Address: P.O. Box 22278, Indianapolis, Indiana 46222  
 FESOP No.: F097-5563-00076  
 Facility: Loading Rack  
 Parameter: Gasoline throughput  
 Limit: 400,000,000 gallons of gasoline product loaded per 365 day period

**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
				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

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

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

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

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

**FESOP Quarterly Report**

Source Name: Amoco Oil Company  
 Source Address: 2500 North Tibbs Avenue, Indianapolis, Indiana 46222-0278  
 Mailing Address: P.O. Box 22278, Indianapolis, Indiana 46222  
 FESOP No.: F097-5563-00076  
 Facility: Loading Rack  
 Parameter: Distillate Oil throughput  
 Limit: 270,000,000 gallons of distillate product loaded per 365 day period

**Month:** \_\_\_\_\_ **Year:** \_\_\_\_\_

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

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

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

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

**FESOP Quarterly Report**

Source Name: Amoco Oil Company  
Source Address: 2500 North Tibbs Avenue, Indianapolis, Indiana 46222-0278  
Mailing Address: P.O. Box 22278, Indianapolis, Indiana 46222  
FESOP No.: F097-5563-00076  
Facility: Loading Rack  
Parameter: Gasoline throughput  
Limit: 364,500,000 gallons of Gasoline Product loaded per 12 month period

**Year:** \_\_\_\_\_

<b>Month</b>	<b>Gasoline Product loaded this month</b>	<b>Gasoline Product loaded for the previous 11 months</b>	<b>Twelve month rolling sum of Gasoline loaded</b>

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

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

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

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

**FESOP Quarterly Report**

Source Name: Amoco Oil Company  
Source Address: 2500 North Tibbs Avenue, Indianapolis, Indiana 46222-0278  
Mailing Address: P.O. Box 22278, Indianapolis, Indiana 46222  
FESOP No.: F097-5563-00076  
Facility: Loading Rack  
Parameter: Distillate Product throughput  
Limit: 270,000,000 gallons of Distillate Product loaded per 12 month period

**Year:** \_\_\_\_\_

<b>Month</b>	<b>Distillate Product loaded this month</b>	<b>Distillate Product loaded for the previous 11 months</b>	<b>Twelve month rolling sum of Distillate Product loaded</b>

9 No deviation occurred in this month.

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

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

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

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

Source Name: Amoco Oil Company  
 Source Address: 2500 North Tibbs Avenue, Indianapolis, Indiana 46222-0278  
 Mailing Address: P.O. Box 22278, Indianapolis, Indiana 46222  
 FESOP No.: F097-5563-00076

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

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

**LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:**

Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations


Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## **Indianapolis Environmental Resource Management Division(ERMD) Air Quality Management Section**

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

#### **Source Background And Description**

**Source Name:** Amoco Oil Company  
**Source Location:** 2500 North Tibbs Avenue, Indianapolis, IN 46222  
**County:** Marion  
**SIC Code:** 5171  
**Operation Permit No.:** F0097-5563-00076  
**Permit Reviewer:** Patrick Coughlin

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Amoco Oil Company relating to the operation of petroleum products terminal.

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

This source consists of the following permitted emissions units and pollution control devices:

- (1) One (1) loading rack for dispensing of petroleum product, with one (1) carbon adsorber, identified as V10, for control of volatile organic compounds. Loading rack installed in 1993.
- (2) Storage tank #2, equipped with an external pontoon floating roof with a dome, 672,000 gallon storage capacity, used to store gasoline product, and constructed in 1942.
- (3) Storage tank #3, equipped with an external pontoon floating roof with a dome, 672,000 gallon storage capacity, used to store gasoline product, and constructed in 1942.
- (4) Storage tank #6, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store gasoline product, and constructed in 1941.
- (5) Storage tank #7, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store gasoline product, and constructed in 1941.
- (6) Storage tank #8, equipped with an external pontoon floating roof with a dome, 3,150,000 gallon storage capacity, used to store gasoline product, and constructed in 1942.
- (7) Storage tank # 1, equipped with a fixed roof, 1,365,000 gallons storage capacity, used to store distillate product, and constructed in 1941.
- (8) Storage tank # 4, equipped with a fixed roof, 1,365,000 gallons storage capacity, used to store distillate product, and constructed in 1941.
- (9) Storage tank # 5, equipped with a fixed roof, 1,365,000 gallons storage capacity, used to store distillate product, and constructed in 1941.

- (10) Storage tank # 11, equipped with a fixed roof, 3,360,000 gallons storage capacity, used to store distillate product, and constructed in 1970.

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

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

### **Emission Units and Pollution Control Equipment Under Enhanced new Source Review (ENSR)**

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

### **Insignificant Emitting Activities**

The source also includes the following insignificant activities:

- 1) 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.
- 2) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- 3) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- 4) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluid.
- 5) Filling drums, pails or other packaging containers with lubricating oils, waxes, and grease.
- 6) Cleaners and solvents characterized as follows:
  - A) having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100°F) or ;
  - B) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20 degrees C (68°F);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- 7) Groundwater oil recovery wells
- 8) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- 9) Process vessels degassing and cleaning to prepare for internal repair.
- 10) Paved and unpaved roads and parking lots with public access.
- 11) 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.
- 12) On-site fire and emergency response training approved by the department
- 13) Filter or coalescer media changeout.
- 14) Laboratory as defined in 326 IAC 2-7-1(20)(C).
- 15) The following facilities with VOC emissions less than 3 pounds per hour or fifteen pounds per day which are not specified in form GSD10(a) of the application:
  - A) Tank 12, 8,000 gallon diesel tank
  - B) Tank 13, 1,000 gallon gasoline tank

- C) Tank 14, Oil/water separator
- D) Tank 15, 2,000 gallon pumpoff tank
- E) Tank 16, 1,100 gallon heater oil tank for shop
- F) Tank 17, 8,000 gallon UST
- G) Tank 18, 1,000 gallon furnace oil UST
- H) Tank 19, 500 gallon oil recycling tank
- I) Tank 20, 8,200 gallon OGA additive tank
- J) Tank 21, 2,000 gallon VRU knock out tank
- K) Tank 22, 1,000 gallon ground water tank
- L) Tank 23, 1,000 gallon oil recovery tank
- M) Air Stripper
- N) Other Miscellaneous Activities (loading, refueling, lab and maintenance)

### Exiting Approvals

This source has been operating under the following approvals

- 1) Operating Permit 0076 issued on August 30, 1988 for Tanks 6, 3, 2, 7 and 8.
- 2) Construction Permit 930076-01 issued on June 3, 1993 for new loading rack equipped with a Carbon Adsorber.

### Enforcement Issues

There are no Enforcement actions pending.

### 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 19, 1996. Additional information was received on October 20, 1997 and December 12, 1997.

### Emissions Calculations

See Appendix A Potential to Emit (PTE) Calculation for detailed calculations.

### Potential Emissions

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

Pollutant	PTE (tons/year)
PM	0
PM-10	0

SO <sub>2</sub>	0
VOC	>100
CO	0
NO <sub>x</sub>	0

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

See attached spreadsheets for detailed calculations ( pages 1, 2, 3 and 5 of 5 in Appendix A)

HAP	PTE (tons/year)
Single HAP	>10
Any Combination of HAPs	>25

See attached spreadsheets for detailed calculations ( pages 4 of 5 in Appendix A)

- (a) The potential emissions (as defined in the Indiana Rule) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (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 emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

**Limited Potential To Emit**

- (a) The source has accepted a federally enforceable limit on potential to emit VOC of 99 tons per year, consisting of:
  - (i) 88 tons per year for the significant activities; and
  - (ii) 10 tons per year for the insignificant activities.
- b) The source has accepted a limit on potential to emit of 9.4 tons per year for any single HAP and 24 tons per year for any combination of HAPs.
- (c) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

	Limited PTE (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs

Vapor Recovery Unit (35 mg/l of gasoline dispensed and 400,000,000 gallons of gasoline dispensed per 365 day period)				58.41			5.5
Storage tanks Gasoline (Tanks 2, 3, 6, 7 and 8) Distillate (Tanks 1, 4, 5 and 11)				3.71 2.19			1.4
Transport truck fugitives Gasoline Distillate				20.8 2.70			1.2
Insignificant Emitting Activities				10.25			Neg.
Total Emissions				98			Less than 9.4 tons for any individual HAP and 24 tons for any combination of HAPs

Attached Table 1 summarizes the permit conditions and requirements.

### County Attainment Status

The source is located in Marion County.

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

- (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 standards. Marion County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

The petroleum loading rack is subject to the New Source Performance Standard, 326 IAC 12, and 40 CFR Part 60. 500, Subpart XX since this source was constructed after December 17, 1980. Pursuant to the requirements of this regulation the VOC emissions are limited to 35 milligrams per liter of gasoline loaded. Based on the initial stack testing required by 40 CFR Part 60, performed on July 1, 1994, this facility appears to be in compliance with the 35 milligrams per liter emissions limitation.

The storage tanks are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110-113, 110a-115a, and 110b-117b, Subparts K, Ka, and Kb, because of date of

construction.

This source is not subject to the Gasoline Terminal MACT standard 326 IAC 12 and 40 CFR Part 63.420 since the result of the screening factor equation are less than 1. In addition to this the VOC limits effectively limit the HAP emissions below the major source thresholds (see emissions calculation in appendix A).

### **State Rule Applicability - Entire Source**

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

Pursuant to this rule, the amount of volatile organic compounds emitted are limited to less than 100 tons per year, the amount of any single HAP emitted is limited less than 10 tons per year, and the amount of any combination of HAPs emitted is limited less than 25 tons per year. To comply with these limits, Amoco Oil Company, has accepted the following conditions:

- (a) 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.
- (b) The amount of gasoline and distillate oil product loaded at the Loading Rack are limited to less than 400,000,000 gallons per 356 day period and 270,000,000 gallons per 365 day period respectively. These throughput limitations are equivalent to 82 tons of VOC per 365 consecutive day period from the loading rack and VRU.

or

As an alternative the amount of gasoline and distillate oil product loaded at the loading rack are limited to less than 364,500,000 gallons per 12 month period and 270,000,000 gallons per twelve month period respectively. This throughput limit is equivalent to 75 tons per twelve (12) consecutive month period from the loading rack and VRU.

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

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

#### **326 IAC 5-1 (Visible Emissions Limitations)**

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

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

### **State Rule Applicability - Individual Facilities**

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

Storage tanks 2, 3, 6, 7 and 8 are subject to the requirements of 326 IAC 8-4-3 because the storage capacities of these tanks are greater than 39,000 gallons and the liquid material stored has a true vapor pressure greater than 10 kPa (1.52 psia). This rule requires specific measures be taken to prevent leakage from the tanks. The tanks are equipped with internal floating roofs which meet the requirements of this regulation.

**326 IAC 8-4-4: Bulk Gasoline Terminals**

The requirements of 326 IAC 8-4-4 applies to all bulk gasoline terminals as defined in 326 IAC 1-2-7. This regulation requires the permittee to operate a vapor control system when loading gasoline into tanker trucks. VOC shall be controlled by a carbon adsorber which processes and recovers vapors and gasses from the equipment being controlled and which releases no more than 80 mg of VOC per liter of gasoline dispensed. The limit set on the Vapor Recovery Collection System needed to comply New Source Performance Standard, 326 IAC 12, and 40 CFR Part 60. 500, Subpart XX satisfies the requirements of 326 IAC 8-4-4.

**326 IAC 8-4-7 Gasoline Transports**

That pursuant to 326 IAC 8-4-7, the permittee shall be responsible to insure that the Vapor Recovery Unit (V10) is connected to all transports and that the owners of all transports loading at the terminal shall comply with this rule.

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

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

**State Applicable Rules for Insignificant Emitting Activities**

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

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

**Compliance Requirements**

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

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

period.

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

The vapor recovery unit(V10) has applicable compliance monitoring conditions as specified below:

- (a) The vapor recovery unit shall be operated at all times when the loading rack is loading gasoline. When operating, the vapor recovery unit shall maintain vacuum on each regenerating cycle, carbon bed temperatures, duct velocities and frequencies of regeneration as recommended according to manufacturers specifications, or as demonstrated by the facility as necessary in order to maintain an emissions rate of 35 mg/l of gasoline loaded.

The Permittee shall monitor and record the vacuum pressure during a regeneration cycle and carbon bed temperatures of the vapor recovery unit at least once per shift when the petroleum loading rack is in operation loading gasoline.

The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the vacuum pressure during the regeneration cycle, and carbon bed temperatures are outside of the ranges recommended according to manufacturer specifications or as demonstrated by the facility as necessary in order to maintain an emissions rate of 35 milligrams of gasoline loaded for any one reading.

Within 30 days of permit issuance the Permittee shall submit, to the addresses listed in Section C - General Reporting Requirements of this permit, the operating ranges for the vacuum pressure during the regeneration cycle and carbon bed temperatures.

- (b) 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.

These monitoring conditions are necessary to insure continuous compliance with 326 IAC 2-8-4, 326 IAC 12 (40 CFR Part 60 Subpart XX), 326 IAC 8-4-3 and 326 IAC 8-4-4.

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

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

- (b) See attached calculations for detailed air toxic calculations (Appendix A page 4 of 5).

### **Conclusion**

The operation of this petroleum products terminal will be subject to the conditions of the attached proposed FESOP No. F097-5563-00076.

Table 1

<b>Emission Unit:</b>	VRU(V10)
<b>Date of Construction:</b>	1991
<b>Alternative Scenario:</b>	none
<b>Pollution Control Equipment:</b>	carbon adsorption
<b>General Description of Requirement:</b>	VOC emissions limit
<b>Numerical Emission Limit:</b>	35 mg/l of Gasoline Loaded
<b>Regulation/Citation:</b>	326 IAC 12 (40 CFR Part 60 Subpart XX), 326 8-4-4, 326 IAC 2-8-4
<b>Compliance Demonstration:</b>	Stack Testing for VOCs
<b>PERFORMANCE TESTING</b>	
<b>Parameter/Pollutant to be Tested:</b>	VOC
<b>Testing Method/Analysis:</b>	Method 25
<b>Testing Frequency/Schedule:</b>	Once every five years
<b>Submittal of Test Results:</b>	within 45 days after completion
<b>COMPLIANCE MONITORING</b>	
<b>Monitoring Description:</b>	Observe bed temperature and vacuum pressure
<b>Monitoring Method:</b>	Temperature sensors and pressure gauges
<b>Monitoring Regulation/Citation:</b>	n/a
<b>Monitoring Frequency:</b>	Once per shift
<b>RECORD KEEPING</b>	
<b>Parameter/Pollutant to be Recorded:</b>	Vacuum pressure and bed temperatures
<b>Recording Frequency:</b>	Once per shift
<b>Submittal Schedule of Reports:</b>	Within 10 days of discovery
<b>REPORTING REQUIREMENTS</b>	
<b>Information in Report:</b>	Nature of deviation and corrective action taken.
<b>Reporting Frequency/Submittal:</b>	Within 10 days of discovery
<b>Additional Comments:</b>	n/a

**Emissions From Loading Rack and VRU**

Loading Loss Emissions Calculations

$$UE = ((Lg/1000 \times GTG) + (Lk/1000 \times GTK)) / 2000$$

$$CEV = EL \times GTG \times (CP / CG)$$

$$KFE = ((GTD \times (Lk/1000)) / 2000)$$

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

Where:

GTG = Limited throughput of gasoline per year (Permit limit, gallons per 365 day period)  
 GTD = Limited throughput of distillate & kerosene per year  
 EL = emissions limitation for VOC from the outlet of the VRU, mg/l  
 CE = capture efficiency for VOCs (see note below)  
 CG = 0.2642 gal equals 1 liter  
 CP = 2.2046 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)

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)

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

Data Inputs (365 day rolling sum)	Data Inputs (12 month rolling sum)	
400,000,000.00	364,500,000.00	
270,000,000.00	270,000,000.00	
35	35	NSPS Limit
98.70%	98.70%	
0.2642	0.2642	
2.2046E-06	2.2046E-06	
8.00	8.00	AP-42 (4.4941 psia, submerged loading vapor balance service)
0.02	0.02	AP-42 (0.0052 psia, submerged loading deticated normal service)
1,602.70	1,460.70	
58.41	53.23	
2.70	2.70	
20.80	18.95	
81.91	74.88	

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 (gal)	Date Installed
1	Distillate	Fixed Roof	1365000	1941
2	Gasoline	Ext. Floating Roof	672,000	1942
3	Gasoline	Ext. Floating Roof	672,000	1942
4	Distillate	Fixed Roof	1,365,000	1941
5	Distillate	Fixed Roof	1,365,000	1941
6	Gasoline	Ext. Floating Roof	3,150,000	1941
7	Gasoline	Ext. Floating Roof	3,150,000	1941
8	Gasoline	Ext. Floating Roof	3,150,000	1942
11	Distillate	Fixed Roof	3,360,000	1,970

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

Storage Tanks ID	Tank Volumes (gal)	Turnovers	Throughput (Gal)	Withdraw Loss	Withdraw Loss Lbs/1000 gal	Standing Loss
2	672,000	8	5,376,000	19	0.003458	1,034
3	672,000	8	5,376,000	19	0.003458	1,034
6	3,150,000	8	25,200,000	44	0.001729	1,671
7	3,150,000	8	25,200,000	44	0.001729	1,671
8	3,150,000	8	25,200,000	44	0.001729	1,671
				168		6,047

Maximum Gasoline throughput (gal/yr)	400,000,000.00
Maximum withdraw loss (lbs/1000 gal)	0.003458
Maximum emissions from Withdrawl Loss (lbs/yr)	1,383.18
Standing Loss for Gasoline, (lbs/yr)	6,046.65
Total Emissions form Gasoline (tons/yr)	3.71

Storage Tanks ID	Tank Volumes (gal)	Turnovers	Throughput (Gal)	Withdraw Loss	Withdraw Loss Lbs/1000 gal	Standing Loss
1	1,365,000	197.8	269,997,000	2,156	0.007986	186
4	1,365,000	197.8	269,997,000	2,213	0.008196	186
5	1,365,000	197.8	269,997,000	2,156	0.007986	186
11	3,360,000	80.4	270,144,000	3,551	0.013146	455
				10,077		828

Maximum Gasoline throughput (gal/yr)	270,000,000.00
Maximum withdraw loss (lbs/1000 gal)	0.013146
Maximum emissions from Withdrawl Loss (lbs/yr)	3,549.32
Standing Loss for Gasoline, (lbs/yr)	827.75
Total Emissions form Gasoline (tons/yr)	2.19

### Insignificant Emitting Activities

Insignificant Emitting Activities	Potential Emissions (tons/yr)
Fugitive (Flanges and Valves)	0.475
Degreasing Operation	0.5336
Tank #10, 95,842 gallon emergency containment Tank	0.00
Tank 12, 8,000 gallon diesel tank	0.01
Tank 13, 1,000 gallon gasoline tank	0.01
Tank 14, Oil/water separator	0.05
Tank 15, 2,000 gallon pumpoff tank	0.15
Tank 16, 1,100 gallon heater oil tank for shop	0.01
Tank 17, 8,000 gallon UST	0.01
Tank 18, 1,000 gallon furnace oil UST	0.01
Tank 19, 500 gallon oil recycling tank	0.05
Tank 20, 8,200 gallon OGA additive tank	0.01
Tank 21, 2,000 gallon VRU knock out tank	0.01
Tank 22, 1,000 gallon ground water tank	0.01
Tank 23, 1,000 gallon oil recovery tank	0.15
Remediation system treating contaminated groundwater	2.74
Other loading, refueling, lab, maintenance...	6.00
Total Emissions from insignificant emitting activities	10.25

**HAP Emissions Estimates**

Estimated Uncontrolled HAP emissions

	HAP to VOC percentage by weight	Total VOC uncontrolled VOC emissions from Gasoline (tons/yr)	Uncontrolled HAP emissions (tons/yr)
Maximum Single HAP for Normal Gasoline (Hexane)	1.60%	1606.41	25.702639
Maximum HAPs content for normal Gasoline	11.00%	1606.41	176.70564

Hexane is the largest HAP constituent (Table C-5) and 11 percent represents the maximum HAP content of conventional gasoline based upon the USEPA Gasoline Distribution Industry (Stage I) - Background Information for Proposed Standards, EPA-453/R-94-002a, January 1994.

Limited Potential to Emit HAPs

Facilities	Benzene	Toluene	Ethylbenzene	Xylene-p	Xylene-m	Xylene-o	Isopropyl benzene	Naphthalene	MTBE	Hexane (-n)	Isocetane	Total Emissions (lbs/Yr)	Total Emissions (Tons/Yr)
Tank 1	0.00	0.00	0.00	14.31	46.58	17.32	0.00	0.59	0.00	0.00	0.00	78.80	0.04
Tank 2	23.15	32.22	0.57	0.12	1.68	0.51	0.05	0.02	139.89	27.16	8.40	233.77	0.12
Tank 3	0.00	0.00	0.00	0.12	0.32	0.17	0.00	0.14	0.00	0.00	0.00	0.75	0.00
Tank 4	0.00	0.00	0.00	12.67	41.26	15.34	0.00	0.52	0.00	0.00	0.00	69.79	0.03
Tank 5	0.00	0.00	0.00	4.45	14.48	5.38	0.00	0.18	0.00	0.00	0.00	24.49	0.01
Tank 6	92.42	109.01	4.27	1.30	9.95	5.00	0.77	1.54	277.30	84.92	50.61	637.09	0.32
Tank 7	83.05	81.63	2.53	0.75	6.12	2.73	0.40	0.66	266.30	79.33	41.48	564.98	0.28
Tank 8	82.47	79.94	2.42	0.72	5.88	2.59	0.38	0.60	265.62	78.98	40.91	560.51	0.28
Tank 10	36.29	49.68	0.84	0.18	2.50	0.73	0.07	0.01	220.24	42.69	13.07	366.30	0.18
Tank 11	0.00	0.00	0.00	38.38	124.97	46.45	0.00	1.57	0.00	0.00	0.00	211.37	0.11
Truck Rack Fugitives	355.88	287.25	5.08	3.22	17.45	5.90	1.78	2.57	1209.99	353.34	162.69	2405.15	1.20
VRU	1634.08	1318.94	23.34	11.67	70.03	23.34	8.17	11.67	5555.87	1622.41	747.01	11026.53	5.51
Equipment Fugitives	131.21	383.15	24.33	7.70	53.59	31.72	5.24	12.32	154.00	78.23	127.82	1009.31	0.50

Total (lbs/yr)	2438.55	2341.82	63.38	95.59	394.81	157.18	16.86	32.39	8089.21	2367.06	1191.99	17188.84	
Total (tons/yr)	1.22	1.17	0.03	0.05	0.20	0.08	0.01	0.02	4.04	1.18	0.60	8.59	

Limited Potential to emit is based on source emissions estimates provided in form GSD 8 of the FESOP application.

**Source Wide Emissions**

Facilities	Limited PTE for VOC (tons/ 365 day rolling sum)	Limited PTE for VOC (tons/ 12 month rolling sum)	Potential Emissions of VOC (tons/yr)	Limited PTE for a single HAP (tons/yr)	Potential Emissions of a single HAP (tons/yr)	Limited PTE for any combination of HAPs (tons/yr)	Potential Emissions for any combination of HAPs (tons/yr)
Gasoline tanks (2,3,6,7,8 and 10)	3.71	3.71	3.71	4.04	25.70	8.59	176.71
Distillate Tanks (1,4,5, and 11)	2.19	2.19	2.19				
Fugitive for loading rack - Gasoline	20.80	18.95	1,602.70				
Fugitive for loading rack - Distillate	2.70	2.70	2.70				
VRU outlet (35 mg/l, Gasoline throughput)	58.41	53.23	NA				
Other Insignificant Emitting Activities	10.25	10.25	10.25				
<b>Total Emissions</b>	<b>98.06</b>	<b>91.03</b>	<b>1,621.55</b>	<b>4.04 (1)</b>	<b>25.70</b>	<b>8.59 (1)</b>	<b>176.71</b>

(1) The VOC emissions limit of 35 milligrams per liter of Gasoline loaded and a throughput of 400,000,000 gallons per 12 month rolling sum effectively limits the HAP emissions to below the Major source thresholds for a single HAP and any combination of HAPs.

## **Indianapolis Environmental Resource Management Division(ERMD) Air Quality Management Section**

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

### **Source Background And Description**

<b>Source Name:</b>	<b>Amoco Oil Company</b>
<b>Source Location:</b>	<b>2500 North Tibbs Avenue, Indianapolis, IN 46222</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>5171</b>
<b>Operation Permit No.:</b>	<b>F0097-5563-00076</b>
<b>Permit Reviewer:</b>	<b>Patrick Coughlin</b>

On November 11, 1996, the Environmental Resources Management Division (ERMD) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Amoco Oil Company had applied for a Federally Enforceable State Operating Permit (FESOP) to operate Gasoline 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.

ERMD has revised the draft permit to include new permit language adopted by IDEM and ERMD.

### **Section A**

ERMD has added the following new conditions to the FESOP to reflect the standard permit language adopted by IDEM, OAM and ERMD:

A.5 Prior Permit Conditions Superseded

### **Section B**

The following conditions have been revised to reflect changes to the standard permit language adopted by IDEM, OAM and ERMD.

- B.4 Enforciability
- B.5 Termination of Right to Operate
- B.6 Servability
- B.8 Duty to Supplement and Provide Information
- B.11 Certification
- B.12 Annual Compliance Certification
- B.14 Emergency Provisions
- B.15 Deviations from Permit Requirements and Conditions
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.17 Permit Renewal
- B.22 (now renumbered B.23) Operational Flexibility
- B.23 (now renumbered B.24) Construction Permit Requirements

ERMD has added the following new condition to the FESOP to reflect the standard permit language adopted by IDEM, OAM and ERMD:

B.22 Changes Under Section 502(b)(10) of the Clean Air Act

**Section C**

The following conditions have been revised to reflect changes to the standard permit language adopted by IDEM, OAM and ERMD.

- C.1 Overall Source Limit [326 IAC 2-8],
- C.5 (renumbered C.6) Operation of Equipment [326 IAC 2-8-5(a)(4)],
- C.6 (renumbered C.8) Performance Testing ,
- C.8 (renumbered C.10) Maintenance of Monitoring Equipment [326 IAC 1-6],
- C.10 (renumbered C.14) Failure to Take Corrective Action ,
- C.11 (renumbered C.15) Action Related to Noncompliance Demonstration by Stack Test,
- C.12 (renumbered C.16) Emissions Reporting [326 IAC 2-6],
- C.13 (renumbered C.17) Monitoring Data Availability,
- C.14 (renumbered C.18) General Record Keeping Requirements and
- C.15 (renumbered C.19) General Reporting Requirements

ERMD has added the following new conditions to the FESOP to reflect the standard permit language adopted by IDEM, OAM and ERMD:

- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2(3)]
- C.7 Asbestos Abatement Projects -Accreditation [326 IAC 14-10][326 IAC 18-1]
- C.12 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18-1][40 CFR 61.140]
- C.13 Risk Management Plan [326 IAC2-8-4][40 CFR 68.215]
- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

During the 30 public notice period ERMD received comments from Amoco Oil Company. ERMD response to these comments are stated below:

**Section A**

1. Condition A.2 the regulatory cite is wrong, there is no regulatory basis for including a facility description in the permit however it is necessary to include this information. Please remove the rule cite. In addition to this please refer to the emissions units using the facility name and not the emissions unit ID.

ERMD has omitted the cite [326 IAC 2-8-3(c)(3)] since it only refers to the application and not the permit. ERMD has also changed the descriptions to include the facility name.

2. Condition A.3 on insignificant emitting activities does not include the correct rule cite requiring the inclusion of insignificant emitting activities in the permit. There is no regulatory basis for including a facility description in the permit however it is necessary to include this information.

ERMD has omitted the cite [326 IAC 2-8-3(c)(3)(I)] since it only refers to the application and not the permit.

## Section B

3. Condition B.8 Duty to Supplement and Provide Information, additional information need only be sent to the agency issuing the permit, ERMD.

Since this is a new program IDEM reserve the right to receive all reports required by this permit.

4. Condition B.8(b) Amoco Oil Company feels that this condition is overly broad, leaving open the possibility for requests of information unrelated to applicable requirements.

The language for condition B.8(b) has been reworded to read as follows:

*“(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.”*

5. Condition B.12 Compliance certification should only be required to be submitted to one agency. Because ERMD has delegated authority to enforce all applicable requirements in the proposed permit, it seems inappropriate to require an additional certification requirements be submitted to US EPA and IDEM.

Since this is a new program IDEM and US EPA reserve the right to receive all reports required by this permit.

6. Condition B.12(c) listed items to be included in the annual compliance certification required under 2326 IAC 2-8-5(a)(1). Section 1 states that each term and condition of this permit be identified along with the basis of the certification. This can be confusing as the as the permit contains a great deal of information that could be construed as a “term or condition”. The phrase “term” or “condition” are not defined and it is unclear if this means just permit emission limits.

ERMD and IDEM understand Amoco’s concern over this issue, IDEM has developed a nonrule policy document (AIR 007 NPD) which addresses these concerns (see attached document).

7. Condition B.14(f) Emergency Provision, states that failure to notify ERMD within 4 daytime business hours will be considered a violation of “any other applicable requirement” It is inappropriate to hold a violation of a notification requirement as a violation of any rule applicable to a facility. Clearly, failure to notification of an emergency pertaining to an individual tank is not related to the applicable rules on any of the tank at the facility, the VRU or other equipment.

This is requirement is established in 326 IAC 2-8-12(f) and therefore can not be changed.

8. Condition B.15 Deviations from Permit Requirements and/or Conditions, requires notification of deviations from permit requirements. The term “deviation” is not defined in the permit or in 326 IAC 2-8. It seems inappropriate to notify the agency of changes in operation that do not cause an increase in potential emissions or exceedance of emissions limits. With “deviations” undefined, the potential exists for a wide variety of interpretations.

ERMD and IDEM agree that the term deviation needs to be defined. The definition of a deviation is discussed in a April 16, 1997 Memorandum from IDEM (see attached memorandum).

9. Section B.15 Deviations from Permit Requirements and/or Conditions, also requires a specific form to be used for reporting a deviation. As with all requirements in the permit to use attached forms, the permit should allow flexibility to use other formats as long as the information required is

submitted.

Condition B.15(b) has been revised to read as follows:

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

10. Condition B.17(b) Permit Renewal, incorrectly states the regulatory citation requiring a timely permit renewal as 326 IAC 2-5-3. The correct citation is 326 IAC 2-8-3.

Condition B.17(b) has been revised to include the correct rule cite.

11. Condition B.22 Operational Flexibility (now renumbered B.23), covers the requirements of notification of operational flexibility changes as regulated under 326 IAC 2-8-15 and additionally requires in (a)(3) the regulated changes to be notified to ERMD, IDEM and USEPA. As stated before, these notification requirements should be consolidated to one agency to reflect that only one agency is issuing the permit and repeat the consistency of reporting to one agency for emergencies and deviations. If there is a requirement or policy for other agencies to be notified, then ERMD, as the agency issuing the permit, should have that responsibility of notifying the other agencies.

Since this is a new program IDEM and US EPA reserve the right to receive all reports required by this permit.

12. Condition B.24 Inspection and Entry (now renumbered B.25) Amoco Oil Company requires any actions by any agency on Amoco property must conform IOSHA and OSHA safety requirements. Amoco suggest the following language:

(f) All actions taken under this subpart or any other part of this permit by ERMD, IDEM OAM, or USEPA shall be in compliance with work practices safety requirements as regulated by IOSHA and OSHA.

ERMD agrees and has added this condition to the permit as item (f).

## Section C

13. Condition C.1 Overall Source Limit, Amoco Oil Company believes that a 365 day rolling total is an inappropriate measure, since tank emissions can only be determined on a monthly basis.

The limits established in condition C.1 have independently enforceable conditions in section D to satisfy the requirements of this condition. Condition C.1 has been revised to include the new language adopted by IDEM and ERMD.

14. Condition C.3 Opacity and C.5 Fugitive Dust should not be included in the permit since this source has no sources of particulate emissions.

These regulation are generally applicable to all emitting units and/or sources. Therefore, there is no change in the condition.

15. Condition C.4 Open Burning is not an emissions limit, but a ban on activity. Amoco suggest revising the header to indicate emissions limitations and standards.

The header has been revised to include the word “Standards”.

16. Condition C.6(b) Operation of Equipment, requires that pollution control equipment be operated

at all times when operating emission units are vented to said control equipment. There is no requirement that during loading of distillates that the loading rack be routed to the VRU. Because C.6(b) states "Unless otherwise stated in this permit," it is likely the best alternative to state this allowance of loading distillate fuels without the VRU in Section D, as noted in the D comments.

See response to comment number 27.

17. Condition C.7 on Performance Testing Stack Testing should not be required since there is no regulatory requirement to do so. Stack test protocols if required should only be sent to the primary agency, it should be the primary agencies responsibility to submit this information to IDEM.

Consistent with IDEM and ERMD Stack Testing Criteria the VRU is required to be tested once every five years. Since this is a new program IDEM reserve the right to receive all reports required by this permit.

18. Condition C.8 Compliance Monitoring requires 90 day for initiating compliance monitoring. Amoco Oil Company believes this time frame is not a reasonable. Furthermore, notification should only be sent to the primary agency, ERMD.

ERMD believes a 90 day time frame is appropriate in most cases. Furthermore this condition includes provisions for requesting an extension to this time frame. Since this is a new program IDEM reserve the right to receive all reports required by this permit.

19. Condition C.11 pressure gauge specifications should be deleted.

This proposed condition has been deleted. The preceding conditions have been renumbered.

20. Condition C.13 (now renumbered C.16) requires joint notification of ERMD and IDEM OAM of stack test results outside of regulatory pr permit limits. As stated above, the permitted should be required to report these data to only ERMD, the agency issuing the permit. References to IDEM should be removed.

Since this is a new program IDEM reserve the right to receive all reports required by this permit.

21. Condition C.14 (now renumbered C.16) Annual Emissions Statement should only be submitted to the primary agency. Furthermore, this document is the primary means of providing the basis for the certification of compliance with the VOC emissions limit of 99 tons per year. This is a significant issue and should be noted in this condition. Condition C.14 (now renumbered C.16) should have an additional section (c) stating:

(c) Submissions of the required emissions inventory statement shall suffice as the basis of the certification of compliance required under condition B.12

The VOC limit of 99 tons per year is not practically enforceable by its self. This limit must be made enforceable by either daily or monthly emissions calculations or appropriate throughput limitations. It is IDEM's and ERMD's policy to incorporate FESOP limits which will demonstrate compliance on a continuous basis. As such ERMD is limiting the VOC emissions from the source to 99 tons per 365 day rolling sum or 91 tons per twelve month rolling sum. Since it is not practical to calculate emissions on a daily basis ERMD has opted to establish compliance with the FESOP limit of less than 100 tons per year based on the amounts of gasoline and distillate oil products loaded at the rack.

22. Condition C.16(a) (now renumbered C.18) record keeping requirements states that all records

must be kept on site for at least three (3) years and made available within one (1) hour of request. The requirement to make data available within one hour is not reasonable. Furthermore the requirement to keep records on site for 3 years has no regulatory basis and is not consistent with other applicable requirements. This condition should be modified to allow for storage on site for 2 years and offsite for the remaining 3 years.

This condition is consistent with standard language adopted by IDEM and ERMD and the requirements of 326 IAC 2-8-4. In situations where there is multiple record keeping requirements which conflict the most stringent requirements apply.

23. Condition C.16(b) and (c) (now renumbered C.18) should include the phrase "where applicable".

These conditions have been revised as requested.

24. Condition C.17(a) (now renumbered C.19) General Reporting Requirements allows for semiannual reporting. Amoco would like to see a tiered approach to reporting, those sources which are not close to the emissions limits should not be required to report as frequently. See comments in Section D.

See response to comment number 32.

#### Section D

25. Facility descriptions should not refer to emissions unit ID, instead the actual name of the facility should be used.

ERMD has revised the facility descriptions to include the name of the facility.

26. Condition D.1.1 the throughput limit of 400,000,000 gallons of gasoline per year should be eliminated since the permit already limits the VOC emissions to less than 99 tons per year.

The throughput limit of 400,000,000 gallons of gasoline dispensed per 365 day period is an independently enforceable condition designed to satisfy condition C.1 and as such remains in the permit. ERMD has revised condition D.1.1 to include the following condition:

*(m) The VOC emissions from the loading rack shall not exceed the limit specified in conditions A or B. The selection of record keeping described by A or B shall be made by the Permittee and shall be changed only once. A Permit Amendment is required to return to the initial record keeping basis. Compliance with either condition A or B below shall make the requirements of 326 IAC 2-7 (Part 70 Operating Permit Program) and 40 CFR Part 63.420 Gasoline Distribution MACT Regulation not applicable.*

*A) Pursuant to 326 IAC 2-8-4(1) the amount of gasoline product loaded at the terminal shall be limited to less than 400,000,000 gallons per 365 day period rolled daily and the amount of distillate product loaded at the terminal shall be limited to 270,000,000 gallons per 365 day period, rolled daily. These limits are equivalent of 82 tons of VOC per 365 day period.*

*B) Pursuant to 326 IAC 2-8-4(1) the amount of gasoline product loaded at the terminal shall be limited to less than 365,500,000 gallons per twelve (12) consecutive month period and the amount of distillate product loaded at the terminal shall be limited to 270,000,000 gallons per twelve (12) consecutive month period. These limits are equivalent of 75 tons of VOC per twelve (12) consecutive month period.*

27. Condition D.1.1 should allow for the loading of distillate into dedicated trucks without requiring

the trucks and loading rack to be routed to the VRU. This flexibility can be added by including the following condition:

- e) During the loading of distillate, the loading rack and trucks receiving distillate fuels are not required to be routed to the vapor collection system and VRU if the truck compartments being loaded were immediately previously in distillate service.

ERMD agrees and has incorporated this condition into the permit as item (a).

- 28. Condition D.1.4(f) requires monthly inspection of the vapor collection, vapor processing and loading racks for leaks, mandating repairs within 15 days. This requirement is more restrictive than 326 IAC 8-4-9(d)(1)(C). Mandating monthly inspections is unnecessary and is not required by regulations.

The requirement to conduct monthly inspections of the vapor collection, vapor processing and loading racks for leaks is required pursuant to 40 CFR Part 60.502(j).

- 29. Condition D.1.5 additional stack testing in should not be required.

Stack Testing is being required pursuant to IDEM Stack Testing Guidance which ERMD has adopted. In accordance with this guidance the VRU is required to be tested at least once every five year.

- 30. Condition D.1.6(a) should be reworded as follows:

- (a) The vapor recovery unit shall be operated at all times when the loading rack is loading gasoline. When operating, the vapor recovery unit shall maintain vacuum on each regenerating cycle, carbon bed temperatures, duct velocities and frequencies of regeneration as recommended according to manufacturers specifications, or as demonstrated by the facility as necessary in order to maintain an emissions rate of 35 mg/l of gasoline loaded.

ERMD agrees and has adopted this permit language as requested.

- 31. Condition D.1.7(a) should not require continuous monitoring instead periodic monitoring should be sufficient. Periodic monitoring is more cost efficient and will be able to provide the information necessary to properly operate the VRU and maintain facility compliance. Amoco recommends that periodic monitoring of the vacuum pressure and carbon bed temperatures be monitored once per shift.

ERMD will accept periodic monitoring of the vacuum pressure and carbon bed temperatures to be monitored once per shift.

- 32. Condition D.1.8, Amoco requests, consistent with previous comments, that condition D.1.8(a) be reworded to state:

- (a) The Permittee shall maintain records at the source of the loading rack throughput. The records shall be complete and sufficient to establish loading rack throughput on 12-month rolling total and for use in determining emissions for the annual emissions inventory report. Should throughput exceed 350 million gallons of gasoline for a 12 month period, certified reporting every six months of loading rack throughput shall be submitted to ERMD, stating the throughput for each of the preceding 12 months. This fulfills the reporting requirements of 326 IAC 2-8-4(3)(C)(i) and condition C.17 of this permit. If triggered this report should begin with April emissions inventory or in October, which ever is first after the 350 million gallons of gasoline threshold is exceeded. The

April report would cover January through December of the pervious year, consistent with the annual emissions inventory report. The October report would cover July through June. Should throughput drop below 350 million gallons for a twelve month rolling total of gasoline loaded, then the reporting will no longer be required.

Pursuant to 326 IAC 8-4-4(3)(C)(i) reporting is required at least every six months. It is ERMD's policy to require quarterly reporting for all FESOPs. Therefore there is no change in this condition.

33. All records shall conform with condition C.15 through C.17 should be amended to include the words, "where appropriate".

This condition has been deleted from the permit

34. Forms at the end of the permit should only be required to be sent to ERMD.

Since this is a new program IDEM reserve the right to receive all reports required by this permit.

Per a phone conversation on January 7, 1998 Amoco Oil Company had two additional comments to the proposed permit revisions.

35. Condition D.2.1 reflects the wrong applicable requirements, since these tanks are equipped with domes they are to be regulated under the provisions of 326 IAC 8-4-3(b) and not 326 IAC 8-4-3(c).

ERMD agrees and has revised the permit to reflect the requirements of 326 IAC 8-4-3(b).

36. Condition D.2.3 monitoring is not appropriate. Amoco Oil company suggests the following language for this condition.

*"(a) The Permittee shall visually inspect the following each time the storage vessel 2, 3, 6, 7 and 8 are emptied and degassed:*

*(1) The internal floating roof equipped with a closure seal, or seals, for visible holes, tears, or other openings in the seal or any seal fabric or materials.*

*(2) All openings, except stub drains, to ensure they are equipped with proper covers, lids, or seals such that:*

*(A) the cover, lid, or seal is in the closed position at all times except when in actual use;*

*(B) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;*

*(C) 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.*

*(3) The Permittee shall repair discrepancies as necessary so that the tank meets the requirements of 326 IAC 8-4-3(b)(1) before refilling the storage vessel with VOL.*

*(b) The Permittee shall visually inspect the internal floating roof and the secondary seal through manholes and roof hatches on the fixed roof at least once every calendar year."*

ERMD agrees and has revised the monitoring requirement as requested.