

**PART 70 OPERATING PERMIT**

**OFFICE OF AIR MANAGEMENT**  
**and**  
**INDIANAPOLIS ENVIRONMENTAL RESOURCES**  
**MANAGEMENT DIVISION**

**Marathon Ashland Petroleum LLC**  
**4955 Robison Road**  
**Indianapolis, Indiana 46268-1040**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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 and the Code of Indianapolis and Marion County, Chapter 4.

Operation Permit No.: T097-7351-00159	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management  Robert F. Holm, PH.D, Administrator Indianapolis Environmental Resources Management Division	Issuance Date:

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## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates stationary Petroleum Products Distribution Terminal.

Responsible Official: Mr. Fred Adams  
Source Address: 4955 Robison Road, Indianapolis, Indiana 46268-1040  
Mailing Address: 4955 Robison Road, Indianapolis, Indiana 46268-1040  
SIC Code: 5171  
County Location: Marion  
County Status: Nonattainment for Total Suspended Particulates  
Source Status: Part 70 Permit Program  
Major Source, under PSD Rule

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (1) Gasoline loading rack with (3) three lanes and a maximum loading capacity of 136,000 gallons per hour. The VOC emissions are controlled by a Carbon Adsorber equipped with two fixed beds as the primary control device or a trailer mounted Vapor Combustor as a backup control device. Emissions from the Carbon Adsorber are exhausted out one stack identified as S1. Emissions from the backup trailer mounted Vapor Combustor are exhausted out one stack identified as S2. This facility was constructed in 1992.
- (2) Storage Tank T1351, equipped with an external double deck floating roof, the primary seal is mechanical shoe, the secondary seal is rim mounted, tank is of welded construction, tank capacity 5,670,000 gallons, storing gasoline, installed in 1959.
- (3) Storage Tank T1352, equipped with an internal floating roof of welded construction and a liquid mounted primary seal, tank capacity 5,670,000 gallons, storing gasoline, installed in 1976.
- (4) Storage Tank T257, equipped with an internal floating roof of welded construction and liquid mounted primary seal, tank capacity 764,862 gallons, storing gasoline, installed in 1955.
- (5) Storage Tank T259, equipped with an external pontoon floating roof, the primary seal is mechanical shoe, the secondary seal is rim mounted, tank is of welded construction, tank capacity 470,400 gallons, storing gasoline, installed in 1959.
- (6) Storage Tank T501, equipped with an with an internal floating roof of welded construction and liquid mounted primary seal, tank capacity 1,851,402 gallons, storing gasoline, installed January 1, 1991.
- (7) Storage Tank T502, equipped with an internal floating roof tank of welded construction and liquid mounted primary seal, tank capacity 1,838,886 gallons, storing gasoline, installed January 1, 1991.

- (8) Storage Tank T554, equipped with an internal floating roof of welded construction and vapor mounted primary seal, tank capacity 1,909,992 gallons, storing gasoline, installed in 1948.
- (9) Storage Tank T556, equipped with an internal floating roof of welded construction and vapor mounted primary seal, tank capacity 1,909,992 gallons, storing gasoline, installed in 1950.
- (10) Storage Tank T802, equipped with an internal floating roof of welded construction and liquid mounted primary seal, tank capacity 2,473,044 gallons, storing gasoline, installed in 1952.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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

- (1) Storage Tank 0-7-1, equipped with an internal floating roof tank capacity 270,648 gallons, storing Ethanol, installed in 1992.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]**

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- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15.

### **B.2 Definitions [326 IAC 2-7-1]**

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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, Code of Indianapolis and Marion County Section 4-11, 326 IAC 1-2, IAPCB Reg. 1-2-2 and 326 IAC 2-7 shall prevail.

### **B.3 Permit Term [326 IAC 2-7-5(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 and Code of Indianapolis and Marion County Section 4-50.

### **B.4 Enforceability [326 IAC 2-7-7(a)]**

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- (a) Unless other wise stated, all terms and conditions in this permit, including any provisions designed to limit the sources potential to emit, are enforceable by IDEM.
- (b) The IAPCB has adopted by reference state rules listed in Attachment A of this permit. The version adopted by reference includes all amendments, additions and repeals filed with the Secretary of State through August 10, 1997 and published in the Indiana Register September 1, 1997, unless otherwise indicated in the adoption by reference. For the purposes of this permit, all state rules adopted by reference by the IAPCB are enforceable by ERMD using local enforcement procedures.
- (c) 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.
- (d) 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 using local enforcement procedures.

### **B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

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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 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

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

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

and

Environmental Resources Management Division  
Air Quality Management Section, Permits  
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 to IDEM, OAM, and ERMD along with a claim of confidentiality under 326 IAC 17 and IAPCB Reg. 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(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; or
- (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.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (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) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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 cover the time period from December 1 to November 30 of the previous year, and 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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.
- (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 compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, and ERMD may require to determine the compliance status of the source.

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(34).

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]**  
**[326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated 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) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (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 describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, 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;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

ERMD

Telephone No.: 317-327-2234 (ask for Data Compliance)  
Facsimile No.: 317-327-2274

- (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 2-7-5(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(34).

- (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 2-7-4-(c)(9) 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 2-7 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 materials of substantial economic value.

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

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit, or;
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, and ERMD shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, and ERMD has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, and ERMD has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps 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 Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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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 Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and ERMD and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21).

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, Indiana 46206-6015

and

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) 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) 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. [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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
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 2-7 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 being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM, and ERMD fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.19 Administrative Permit Amendment [326 IAC 2-7-11]**

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- (a) An administrative permit amendment is a Part 70 permit revision that makes changes of the type specified under 326 IAC 2-7-11(a).
- (b) An administrative permit amendment may be made by IDEM, OAM, and ERMD, consistent with the procedures specified under 326 IAC 2-7-11(c).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.20 Minor Permit Modification [326 IAC 2-7-12]**

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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 2-7-11.
- (b) Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b), except as provided by 326 IAC 2-7-12(c).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-7-12(b) and shall include the information required in 326 IAC 2-7-12(b)(3)(A) through (E).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1 and IAPCB Reg. 2-1-1. 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 2-7-12(b)(6)(A) through (C), 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 2-7-12(b)(7)]

**B.21 Significant Permit Modification [326 IAC 2-7-12(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) Every 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 2-7-12(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-7 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, review by affected states, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.

**B.22 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]**  
**[326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.23 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]**

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The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) 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) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

**B.24 Operational Flexibility [326 IAC 2-7-20]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-1 and IAPCB Reg. 2-1-1 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

and

Environmental Resources Management Division  
Air Quality Management Section, Permits  
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 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for 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 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act 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(34).

- (c) Emission Trades [326 IAC 2-7-20(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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.25 Construction Permit Requirement [326 IAC 2][IAPCB Reg. 2-1-1]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2 and IAPCB Reg. 2-1-1.

B.26 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of IDEM 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 Part 70 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 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, and ERMD or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source.

In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, and ERMD nor an authorized representative, may disclose the information unless and until IDEM, OAM, and ERMD makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 and IAPCB Reg. 17 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9][IAPCB Reg. 17]

- (2) The Permittee, and IDEM, OAM, and ERMD acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.27 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (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 Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11.
- (c) IDEM, OAM, and ERMD shall reserve the right to issue a new permit.

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, and ERMD, within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-7-19 and Chapter 4 of the Code of Indianapolis and Marion County.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

B.29 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 Federal Register 8313]

Notwithstanding the conditions of this permit specifying practices for applicable requirements, other credible evidence may also be used to establish compliance or noncompliance with applicable requirements.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), this source is a major source.

#### 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 in 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.

The Permittee shall not open burn any material except as provided in Chapter 4, Code of Indianapolis and Marion County and IAPCB Reg 4-1. Provisions of the code that are more stringent than 326 IAC 4-1 are locally enforceable only by ERMD.

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

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

#### C.5 Fugitive Dust Emissions [326 IAC 6-4][IAPCB Reg. II-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 2-7-6(6)]

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, as described in Section D of this permit.

C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18]  
[40 CFR 61, Subpart M][IAPCB Reg. 14-10-3]

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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 be accredited is federally enforceable.

**Testing Requirements [326 IAC 2-7-6(1)]**

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

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in 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

no later than thirty-five (35) days before the intended test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, 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 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

in writing, no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the 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(34).

C.10 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than once (8) hours until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. 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 according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [IAPCB Reg. 14-10] [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. (By IAPCB Reg. 14-10-3 in Marion County notification must be given at levels of 25 linear feet on pipes or 15 square feet on other facility components or 35 cubic feet on other facility components.) All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3 and IAPCB Reg. 14-10-5, 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 ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2) and IAPCB Reg. 14-10-5(g).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3) and IAPCB Reg. 14-10-5.

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  
Asbestos Program  
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, IAPCB Reg. 14-10-6 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. The requirement that the inspector be accredited is federally enforceable.
- (g) Friable asbestos materials must be removed by an operator with a valid Certificate of Operation issued by ERMD (IAPCB Reg. 14-10-4).

### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

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

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on January 6, 1989.
- (b) If the ERP is disapproved by IDEM, OAM, and ERMD, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM, and ERMD, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

#### **C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

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If a regulated substance, subject to 40 CFR 68, is present in more than the threshold quantity, 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 a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM, and ERMD that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, and ERMD that the Risk Management Plan is being properly implemented.

#### **C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(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) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps 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 response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring 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 process has already returned to operating within "normal" parameters and no response steps are required.

- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

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

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM and ERMD within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM and ERMD shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM and ERMD within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM and ERMD reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. 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 2-7-5(3)] [326 IAC 2-7-19]**

**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

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- (a) The Permittee shall submit a certified, annual emission statement that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission 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

- (c) The annual emission statement 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.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, 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) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, 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 stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM, and ERMD representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;

- (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(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 response step 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 or response steps 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.21 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

- (1) Gasoline loading rack with (3) three lanes and a maximum loading capacity of 136,000 gallons per hour. The VOC emissions are controlled by a Carbon Adsorber equipped with two fixed beds as the primary control device or a trailer mounted Vapor Combustor as a backup control device. Emissions from the Carbon Adsorber are exhausted out one stack identified as S1. Emissions from the backup trailer mounted Vapor Combustor are exhausted out one stack identified as S2. This facility was constructed in 1992.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Emission Limits, Standards, and Other Emissions-Related Requirements: [40 CFR Part 60 Subpart XX] [326 IAC 12] [IAPCB Reg. 12] [40 CFR Part 63 Subpart R] [326 IAC 8-4-9] [326 IAC 8-4-4]

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

- (g) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the gasoline tank truck from exceeding four thousand five hundred (4,500) Pascals (Pa) (450 mm of H<sub>2</sub>O) during product loading. This level shall not be exceeded when measured by the procedures specified in the test methods 40 CFR 60.503(d).[40 CFR Part 60.502(h)]
- (h) No pressure-vacuum vent in the permitted terminal's vapor collection system shall begin to open at a system pressure less than 4,500 Pa (18 inches of H<sub>2</sub>O). [40 CFR Part 60.502(i)]
- (i) Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.[40 CFR Part 60.502(j)] [326 IAC 8-4-9(d)]
- (j) Loading of gasoline tank trucks shall be restricted to the use of submerged fill.
- (k) The VOC emission to the atmosphere from the control device (carbon absorber vapor recovery unit or backup trailer mounted flare) on the Loading Rack due to loading of liquid product into gasoline tanker trucks shall not exceed 35 milligrams per liter of gasoline (0.292 lbs/1000 gals gasoline) outlet concentration. This conditions will satisfy 326 IAC 8-4-4(1)(A), and 40 CFR Part 60.502(c).
- (l) The backup portable trailer mounted vapor combustor shall be designed and operated to meet the following requirements, at all times when emissions may be vented to this control devise:
  - 1) no visible emissions except for periods not to exceed 5 minutes in a two hour period,
  - 2) flare pilot flame present as determined through the use of a thermocouple or any other equivalent devise to detect the presence of a flame.
  - 3) gas being combusted shall have a heat content of 300 Btu/scf or greater, and
  - 4) an exit velocity less than 54.76 ft/sec.

D.1.2 Hazardous Air Pollutant Emissions [40 CFR Part 63.420][326 IAC 20]

The Permittee shall limit the total throughput of gasoline products through the loading rack and tanks as specified below such that the requirements National Emissions Standards for Gasoline Distribution Facilities 40 CFR Part 63 Subpart R shall not apply;

- 1) the throughput of normal gasoline and oxygenated/reformulated gasoline with MTBE combined shall not exceed 560,000,000 gallons per twelve (12) consecutive month period, rolled monthly, and
- 2) the throughput of oxygenated/reformulated gasoline with MTBE shall not exceed 199,117,756 gallons per twelve (12) consecutive month period, rolled monthly.

This limit is equivalent to 9 tons of any single HAP per twelve (12) consecutive month period and 17 tons of any combination of HAPs twelve (12) consecutive month period.

**D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.1.4 Stack Testing Requirement**

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

**D.1.5 Vapor Collection and Liquid Loading Equipment**

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

**D.1.6 Leaks from Transports and Vapor Collection Systems**

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

- 1) The Permittee shall obtain the vapor tightness documentation described in the test methods and procedures in 40 CFR 60.505(b) for each gasoline tank truck that is to be loaded at the permitted loading racks;
- 2) The Permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the terminal;
- 3) The Permittee shall cross-check each tank identification number obtained in paragraph (2) of this condition with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded;
- 4) The Permittee shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at the permitted loading racks that the tank truck is not vapor-tight within 3 weeks after the loading has occurred; and
- 5) The Permittee shall take steps to ensure that the non-vapor-tight gasoline tank truck will not be reloaded at the permitted loading rack until vapor tightness documentation for that tank truck is obtained.

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

**D.1.7 Monitoring**

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The following conditions apply to the operation of the Carbon Adsorber and the Vapor Combustor:

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

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

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

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

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

The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when the presence of a flame is not detected.

- (c) Each calendar month, the vapor collection system, the vapor control system, and each loading rack that loads gasoline tank trucks shall be inspected for total organic compounds liquid or vapor leaks during product transfer operations. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. [40 CFR Part 60.502(j)] [326 IAC 8-4-9(d)]

The Compliance Response 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.1.8 Record Keeping Requirements**

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- (a) To document compliance with D.1.6, the vapor tightness documentation shall be kept at the terminal in a permanent for available for inspection. The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, at a minimum, the following information:

- 1) Test title: Gasoline Delivery Tank Pressure Test--EPA Reference Method 27;
- 2) Tank owner and address;
- 3) Tank identification number;
- 4) Testing location;
- 5) Date of test;
- 6) Tester name and signature;
- 7) Witnessing inspector, if any: name, signature, and affiliation; and
- 8) Test results: actual pressure change in 5 minutes, mm of water (average for two runs).

The Permittee shall keep documentation of all notifications required under condition D.1.6.

- (b) To document compliance with condition D.1.7(a), the Permittee shall maintain the continuous strip chart of the carbon bed pressure. The Permittee shall also keep records of all corrective actions implemented per event.
- (c) To document compliance with D.1.7(b) the Permittee shall keep records of the date and time whenever the automated alarm used to detect the presence of a flame is activated. The Permittee shall also keep records of all corrective actions implemented per event.
- (d) A record of each monthly leak inspection required under Condition D.1.7(c) of this permit shall be kept on file at the terminal. Inspection records shall include, at a minimum, the following information:
  - 1) Date of inspection;
  - 2) Findings (may indicate no leaks discovered or location, nature, and severity of each leak);
  - 3) Leak determination method;
  - 4) Corrective action (date each leak repaired and reasons for any repair interval in excess of 15 calendar days); and
  - 5) Inspector name and signature.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

### SECTION D.2 FACILITY OPERATION CONDITIONS

Storage tanks for petroleum products consisting of the following:

- (2) Storage Tank T1351, equipped with an external double deck floating roof, the primary seal is mechanical shoe, the secondary seal is rim mounted, tank is of welded construction, tank capacity 5,670,000 gallons, storing gasoline, installed in 1959.
- (3) Storage Tank T1352, equipped with an internal floating roof of welded construction and a liquid mounted primary seal, tank capacity 5,670,000 gallons, storing gasoline, installed in 1976.
- (4) Storage Tank T257, equipped with an internal floating roof of welded construction and liquid mounted primary seal, tank capacity 764,862 gallons, storing gasoline, installed in 1955.
- (5) Storage Tank T259, equipped with an external pontoon floating roof, the primary seal is mechanical shoe, the secondary seal is rim mounted, tank is of welded construction, tank capacity 470,400 gallons, storing gasoline, installed in 1959.
- (6) Storage Tank T501, equipped with an with an internal floating roof of welded construction and liquid mounted primary seal, tank capacity 1,851,402 gallons, storing gasoline, installed January 1, 1991.
- (7) Storage Tank T502, equipped with an internal floating roof tank of welded construction and liquid mounted primary seal, tank capacity 1,838,886 gallons, storing gasoline, installed January 1, 1991.
- (8) Storage Tank T554, equipped with an internal floating roof of welded construction and vapor mounted primary seal, tank capacity 1,909,992 gallons, storing gasoline, installed in 1948.
- (9) Storage Tank T556, equipped with an internal floating roof of welded construction and vapor mounted primary seal, tank capacity 1,909,992 gallons, storing gasoline, installed in 1950.
- (10) Storage Tank T802, equipped with an internal floating roof of welded construction and liquid mounted primary seal, tank capacity 2,473,044 gallons, storing gasoline, installed in 1952.

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Internal Floating Roof Tanks [326 IAC 8-4-3] [40 CFR Part 60 Subpart K]  
[40 CFR Part 60 Subpart Kb][326 IAC 12][IAPCB Reg. 12]

- (a) Pursuant to 326 IAC 8-4-3(b), storage tanks T1352, T257, T501, T502, T554 and T802 shall meet the following requirements:

- (1) 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.
  - (2) 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.
  - (3) All openings, except stub drains, shall be equipped with covers, lids, or seals such that:
    - i. the cover, lid, or seal is in the closed position at all times except when in actual use;
    - ii. automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supporters; and
    - iii. rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.
- (b) Storage tank T1352 shall meet the following additional requirements pursuant to 40 CFR Part 60.110, Subpart K;
- (1) Any additional applicable requirements specified in 40 CFR Part 60.110 through 60.113.
  - (2) Pursuant to 40 CFR Part 60.112(a), the Permittee shall not store any petroleum liquid with a true vapor pressure greater than 570 mmHg (11.1 psia) in tank T1352 unless the storage vessel is equipped with a vapor recovery system or its equivalent.
- (c) Storage tanks T501 and T502 shall meet the following additional requirements pursuant to 40 CFR Part 60.110b, Subpart Kb;
- (1) Any additional applicable requirements specified in 40 CFR Part 60.110b through 60.116.
  - (2) Pursuant to 40 CFR Part 60.112b(b), the Permittee shall not store any petroleum liquid with a true vapor pressure greater than 76.6 kPa in tanks T501 and T502 unless the storage vessel is equipped with a closed vent system and control device as specified in 60.112b(a)(3) or its equivalent.
  - (3) Pursuant to 40 CFR Part 60.113b(a)(2), if the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in condition D.2.5 of this permit cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in § 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible

#### D.2.2 External Floating Roof Tanks [326 IAC 8-4-3]

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Pursuant to 326 IAC 8-4-3(c), storage tanks T259 and T1351 shall meet the following requirements:

- (a) These tanks have been fitted with:
  - (1) a continuous secondary seal extending from the floating roof to the tank wall (rim-mounted secondary seal); or
  - (2) a closure or other device approved by the commissioner which is equally effective.
- (b) All seal closure devices meet the following requirements:
  - (1) there are no visible holes, tears, or other openings in the seal(s) or seal fabric;
  - (2) the seal(s) are intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall.
  - (3) for vapor mounted primary seals, the accumulated gap area around the circumference of the secondary seal where a gap exceeding one-eighth (1/8) inch exists between the secondary seal and the tank wall shall not exceed 1.0 square inch per foot of tank diameter.
  - (4) there shall be no gaps exceeding one-half (1/2) inch between the secondary seal and the tank wall of welded tanks and no gaps exceeding one (1) inch between the secondary seal and the tank wall of riveted tanks.
- (c) All openings in the external floating roof, except for automatic bleeder vents, rim space vents, and leg sleeves, are:
  - (1) equipped with covers, seals, or lids in the closed position except when the openings are in actual use; and
  - (2) equipped with projections into the tank which remain below the liquid surface at all times.
- (d) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;
- (e) rim vents are set to open when the roof is being floated off the leg supports or at the manufacturer's recommended setting; and
- (f) emergency roof drains are provided with slotted membrane fabric covers or equivalent covers which cover at least ninety percent (90%) of the area of the opening.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

## **.Compliance Determination**

### **D.2.4 Test Methods and Compliance Procedures**

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The permittee shall determine compliance with Condition D.2.2(b)(3) for external floating roof tanks equipped with vapor mounted primary seals as follows:

- (a) Physically measuring the length and width of all gaps around the entire circumference of the secondary seal in each place where a 0.32 cm (0.125 in.) uniform diameter probe passes freely (without forcing or binding against the seal) between the seal and tank wall; and
- (b) Summing the area of the individual gaps.

## **Compliance Monitoring Requirements [326 IAC 2-7-6] [326 IAC 2-7-5(a)(1)]**

### **D.2.5 Inspection Requirements for Internal Floating Roof Tanks**

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- (a) For tanks equipped with a single seal system, the permittee shall:
  - (1) Visually inspect the internal floating roof and its closure seal or seals through roof hatches at least once every 12 months; and
  - (2) Perform a complete inspection of any cover and single seal whenever the tank is emptied for non-operational reasons or at least every 10 years, whichever is more frequent.
- (b) For tanks equipped with a double seal system, the permittee shall:
  - (1) Visually inspect the internal floating roof and its closure seal or seals through the roof hatches at least once every 5 years; and
  - (2) Perform a complete inspection of any cover and double seal whenever the tank is emptied for non-operational reasons or at least every 5 years, whichever is more frequent.

### **D.2.6 Inspection Requirements for External Floating Roof Tanks**

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The permittee shall:

- (a) Perform a visual inspection semiannually (including visual inspection of the secondary seal gap) necessary for ensuring compliance with Condition D.2.2 of this permit; and
- (b) Perform measure the secondary seal gap annually according to the procedure described in Condition D.2.4 to ensure compliance with Condition D.2.2(b)(3).

## **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.2.7 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records of results of inspections required in conditions D.2.5 and D.2.6.

- (b) Pursuant to 40 CFR Part 60.116b(a) and (b) the owner/operator of storage tank T501 and T502 shall maintain records showing the dimensions of the storage vessels and an analysis showing the capacity of the storage vessels for the life of the source.
- (c) Pursuant to 40 CFR Part 60.113(a), 40 CFR Part 60.116b(c) and 326 IAC 8-4-3 the owner/operator of storage tanks T1351, T1352, T257, T259, T501, T502, T554, T556, and T802 shall maintain the following records:
  - (1) petroleum liquid stored,
  - (2) the period of storage, and
  - (3) the maximum true vapor pressure of that liquid during the respective storage period.
- (d) 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:

- 1) Storage Tank 0-7-1, equipped with an internal floating roof tank capacity 270,648 gallons, storing Ethanol, installed in 1992.

#### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### D.3.1 Volatile Organic Compounds

- (a) Pursuant to 40 CFR Part 60.116b(a) and (b) the owner/operator of storage tank 0-7-1 shall maintain records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel for the life of the source.
- (b) Pursuant to 40 CFR Part 60.116b(c) the owner/operator of storage tank 0-7-1 shall maintain the following records:
  - i. name of Volatile Organic Liquid (VOL) stored,
  - ii. the period of storage, and
  - iii. the maximum true vapor pressure of VOL during the respective storage period.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Marathon Ashland Petroleum LLC  
Source Address: 4955 Robison Road, Indianapolis, Indiana 46268-1040  
Mailing Address: 4955 Robison Road, Indianapolis, Indiana 46268-1040  
Part 70 Permit No.: T097-7351-00159

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

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Emergency/Deviation Occurrence Reporting Form
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

**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**

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

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Marathon Ashland Petroleum LLC  
Source Address: 4955 Robison Road, Indianapolis, Indiana 46268-1040  
Mailing Address: 4955 Robison Road, Indianapolis, Indiana 46268-1040  
Part 70 Permit No.: T097-7351-00159

**This form consists of 2 pages Page 1 of 2**

Check either No. 1 or No.2	
<input checked="" type="radio"/> 1.	This is an emergency as defined in 326 IAC 2-7-1(12) <input type="checkbox"/> The Permittee must notify the ERMD and OAM, within four (4) business hours; and <input type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) days, and follow the other requirements of 326 IAC 2-7-16
<input checked="" type="radio"/> 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c) <input type="checkbox"/> The 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:

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**

**Part 70 Quarterly Report**

Source Name: Marathon Ashland Petroleum LLC  
Source Address: 4955 Robison Road, Indianapolis, Indiana 46268-1040  
Mailing Address: 4955 Robison Road, Indianapolis, Indiana 46268-1040  
Part 70 Permit No.: T097-7351-00159  
Facility: Loading Rack and Tanks  
Parameter: Throughput of Oxygenated/Reformulated Fuel with MTBE  
Limit: 199,117,756 gallons per (12) consecutive month period

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

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

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
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**

**Part 70 Quarterly Report**

Source Name: Marathon Ashland Petroleum LLC  
 Source Address: 4955 Robison Road, Indianapolis, Indiana 46268-1040  
 Mailing Address: 4955 Robison Road, Indianapolis, Indiana 46268-1040  
 Part 70 Permit No.: T097-7351-00159  
 Facility: Loading Rack and Tanks  
 Parameter: Combined throughput of Normal Gasoline and Oxygenated/Reformulated Gasoline with MTBE  
 Limit: 560,000,000 gallons per (12) consecutive month period

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

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

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
 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**

**PART 70 OPERATING PERMIT  
 QUARTERLY COMPLIANCE REPORT**

Source Name: Marathon Ashland Petroleum LLC  
 Source Address: 4955 Robison Road, Indianapolis, Indiana 46268-1040  
 Mailing Address: 4955 Robison Road, Indianapolis, Indiana 46268-1040  
 Part 70 Permit No.: T097-7351-00159

**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.

## Attachment A

The following state rule have been adopted by reference by the Indianapolis Air Pollution Control Board and are enforceable by Indianapolis Environmental Resources Management Division (ERMD) using local enforcement procedures.

- (1) 326 IAC 1-1-1 through 1-1-3 and 1-1-5;
- (2) 326 IAC 1-2-1 through 1-2-91 (In addition, the IAPCB has adopted several local definitions);
- (3) 326 IAC 1-3-1 through 1-3-4;
- (4) 326 IAC 1-4-1 (The IAPCB added to the adoption by reference a citation to 61 FR 58482 (November 15, 1996));
- (5) 326 IAC 1-5-1 through 1-5-5;
- (6) 326 IAC 1-6-1 through 1-6-6;
- (7) 326 IAC 1-7-1 through 1-7-5
- (8) 326 IAC 2-3-1 through 2-3-5;
- (9) 326 IAC 2-4-1 through 2-4-6;
- (10) 326 IAC 2-6-1 through 2-6-4;
- (11) 326 IAC 2-7-1 through 2-7-18, 2-7-20 through 2-7-25;
- (12) 326 IAC 2-8-1 through 2-8-15, 2-8-17 through 2-8-10;
- (13) 326 IAC 2-9-1 through 2-9-14;
- (14) 326 IAC 2-10-1 through 2-10-5 (The IAPCB adoption adds the language "state or local" immediately after the word "federal" in 326 IAC 2-10-1);
- (15) 326 IAC 2-11-1, 2-11-3 and 2-11-4 (The IAPCB adoption adds the language "federal, state or local" immediately after the word "by" in 326 IAC 2-11-1);
- (16) 326 IAC 3-1.1-1 through 3-1.1-5;
- (17) 326 IAC 3-2.1-1 through 3-2.1-5;
- (18) 326 IAC 3-3-1 through 3-3-5;
- (19) 326 IAC 4-2-1 through 4-2-2;
- (20) 326 IAC 5-1-1 (a), (b) and c) (5), 5-1-2 (1), (2)(A), (2)c) (4), 5-1-3 through 5-1-5, 5-1-7;
- (21) 326 IAC 7-1.1-1 and 7-1.1-2;
- (22) 326 IAC 7-2-1;
- (23) 326 IAC 7-3-1 and 7-3-2;
- (24) 326 IAC 7-4-2(28) through (31) (Instead of adopting by reference 7-4-2(1) through (27), the IAPCB regulation substitutes the same requirements listed in a format in which the companies are alphabetized and emission points known to no longer exist have been deleted);
- (25) 326 IAC 8-1-0.5 except (b), 8-1-1 through 8-1-2, 8-1-3 except c), (g) and (i), 8-1-5 through 8-1-12;
- (26) 326 IAC 8-2-1 through 8-2-12 (The IAPCB adoption by reference of 8-2- 5 adds additional language specific to Zimmer Paper Products, Incorporated as subpart c);
- (27) 326 IAC 8-3-1 through 8-3-7;
- (28) 326 IAC 8-4-1 through 8-4-5, 8-4-6 (a)(6), (a)(8) and (a)(14) and 8-4-6(b)(1), (b)(3) and 8-4-6c) (In place of 8-4-6(b)(2), which was not adopted, the IAPCB adopted language requiring a pressure relief valve set to release at no less than four and eight-tenths (4.8) Kilo Pascals (seven-tenths (0.7) pounds per square inch)), 8-4-7 except (e), 8-4-8 and 8-4-9;
- (29) 326 IAC 8-5-1 through 8-5-4, 8-5-5 except (a)(3) and (d)(3);
- (30) 326 IAC 8-6-1 and 8-6-2;
- (31) 326 IAC 9-1-1 and 9-1-2;
- (32) 326 IAC 11-1-1 through 11-1-2;
- (33) 326 IAC 11-2-1 through 11-2-3;
- (34) 326 IAC 11-3-1 through 11-3-6;
- (35) 326 IAC 14-1-1 through 14-1-4;

Attachment A continued

- (36) 326 IAC 14-2-1 except 40 CFR 61.145;
- (37) 326 IAC 14-3-1;
- (38) 326 IAC 14-4-1;
- (39) 326 IAC 14-5-1;
- (40) 326 IAC 14-6-1;
- (41) 326 IAC 14-7-1;
- (42) 326 IAC 14-8-1 through 14-8-5;
- (43) 326 IAC 15-1-1, 15-1-2(a)(1), (a)(2) and (a)(8), 15-1-3 and 15-1-4;
- (44) 326 IAC 20-1-1 through 20-1-4 (In 20-1-3(b)(2) the adoption states that "permitting authority" means the commissioner of IDEM or the administrator of ERMD, whichever is applicable);
- (45) 326 IAC 20-2-1;
- (46) 326 IAC 20-3-1;
- (47) 326 IAC 20-4-1;
- (48) 326 IAC 20-5-1;
- (49) 326 IAC 20-6-1;
- (50) 326 IAC 20-7-1;
- (51) 326 IAC 20-8-1;
- (52) 326 IAC 20-9-1;
- (53) 326 IAC 20-14-1;
- (54) 326 IAC 20-15-1;
- (55) 326 IAC 20-16-1;
- (56) 326 IAC 20-17-1;
- (57) 326 IAC 20-18-1;
- (58) 326 IAC 20-19-1;
- (59) 326 IAC 20-20-1;
- (60) 326 IAC 20-21-1;
- (61) 326 IAC 21-1-1 (The adoption states that "or the administrator of ERMD" is added in (b));
- (62) 326 IAC 22-1-1 (The adoption states that "or the administrator of ERMD" is added in (b)).

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

Technical Support Document (TSD) for a Part 70 Operating Permit

**Source Background and Description**

<b>Source Name:</b>	Marathon Ashland Petroleum LLC
<b>Source Location:</b>	4955 Robison Road, Indianapolis, Indiana 46268
<b>County:</b>	Marion
<b>SIC Code:</b>	5171
<b>Operation Permit No.:</b>	T097-7351-00159
<b>Permit Reviewer:</b>	Mr. Patrick Coughlin

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Marathon Oil Company relating to the operation of a stationary Petroleum Products Distribution Terminal.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (1) Gasoline loading rack with (3) three lanes and a maximum loading capacity of 136,000 gallons per hour. The VOC emissions are controlled by a Carbon Adsorber equipped with two fixed beds as the primary control device or a trailer mounted Vapor Combustor as a backup control device. Emissions from the Carbon Adsorber are exhausted out one stack identified as S1. Emissions from the backup trailer mounted Vapor Combustor are exhausted out one stack identified as S2. This facility was constructed in 1992.
- (2) Storage Tank T1351, equipped with an external double deck floating roof, the primary seal is mechanical shoe, the secondary seal is rim mounted, tank is of welded construction, tank capacity 5,670,000 gallons, storing gasoline, installed in 1959.
- (3) Storage Tank T1352, equipped with an internal floating roof of welded construction and a liquid mounted primary seal, tank capacity 5,670,000 gallons, storing gasoline, installed in 1976.
- (4) Storage Tank T257, equipped with an internal floating roof of welded construction and liquid mounted primary seal, tank capacity 764,862 gallons, storing gasoline, installed in 1955.
- (5) Storage Tank T259, equipped with an external pontoon floating roof, the primary seal is mechanical shoe, the secondary seal is rim mounted, tank is of welded construction, tank capacity 470,400 gallons, storing gasoline, installed in 1959.

- (6) Storage Tank T501, equipped with an with an internal floating roof of welded construction and liquid mounted primary seal, tank capacity 1,851,402 gallons, storing gasoline, installed January 1, 1991.
- (7) Storage Tank T502, equipped with an internal floating roof tank of welded construction and liquid mounted primary seal, tank capacity 1,838,886 gallons, storing gasoline, installed January 1, 1991.
- (8) Storage Tank T554, equipped with an internal floating roof of welded construction and vapor mounted primary seal, tank capacity 1,909,992 gallons, storing gasoline, installed in 1948.
- (9) Storage Tank T556, equipped with an internal floating roof of welded construction and vapor mounted primary seal, tank capacity 1,909,992 gallons, storing gasoline, installed in 1950.
- (10) Storage Tank T802, equipped with an internal floating roof of welded construction and liquid mounted primary seal, tank capacity 2,473,044 gallons, storing gasoline, installed in 1952.

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

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

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

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

#### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- 1) The following equipment related to manufacturing activities not resulting in the emissions of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.
- 2) Process vessel degassing and cleaning to prepare for internal repair.
- 3) Paved and unpaved roads
- 4) On-site fire and emergency response training approved by the department
- 5) Stationary fire pumps
- 6) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- 7) Other categories with emissions below insignificant thresholds:
  - a) Storage Tank AA-10-1, equipped with an fixed cone roof, tank capacity 7,770 gallons, storing Additive, installed in 1992.

- b) Storage Tank AA-10-2, equipped with an fixed cone roof, tank capacity 7,770 gallons, storing Additive, installed in 1992.
- c) Storage Tank 0-7-1, equipped with an internal floating roof tank capacity 270,648 gallons, storing Ethanol, installed in 1992.
- d) Storage Tank T-1, equipped with an horizontal fixed cone roof, tank capacity 7,896 gallons, storing Transmix, installed in 1992.
- e) Storage Tank T-2, equipped with an horizontal fixed cone roof, tank capacity 7,896 gallons, storing Transmix, installed in 1992.

### **Existing Approvals**

The source has been operating under the following approvals:

- (1) Operating Permit 0159, issued on February 18, 1994
- (2) Construction Permit 920051-01, issued January 31, 1992

All conditions from previous approvals were incorporated into this Part 70 permit.

### **Enforcement Issue**

There are no Enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit application for the purposes of this review was received on December 4, 1996.

A notice of completeness letter was mailed to the source on December 4, 1996.

### **Emission Calculations**

See Appendix A: Emissions Calculations for detailed calculations (pages 1 through 5 in Appendix A)

**Potential Emissions**

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

Pollutant	Potential Emissions (tons/year)
PM	<i>less than 100</i>
PM-10	<i>less than 100</i>
SO <sub>2</sub>	<i>less than 100</i>
VOC	<i>greater than 250</i>
CO	<i>less than 100</i>
NO <sub>x</sub>	<i>less than 100</i>

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

HAP's	Potential Emissions (tons/year)
Individual HAPs	<i>greater than 10</i>
Combination of HAPs	<i>greater than 25</i>

- (a) The potential emissions (as defined in the Indiana Rule) of VOCs 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.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects 1996 emission data submitted by the source pursuant to 326 IAC 2-6.

Pollutant	Actual Emissions (tons/year)
PM	<i>0</i>
PM-10	<i>0</i>
SO <sub>2</sub>	<i>0</i>
VOC	<i>49.08</i>
CO	<i>0</i>
NO <sub>x</sub>	<i>0</i>
Benzene	<i>0.44</i>
Ethylbenzene	<i>0.04</i>
Hexane	<i>0.79</i>
Toluene	<i>0.64</i>
2,2,4-Trimethylpentane	<i>0.39</i>
Xylene	<i>0.24</i>

**Limited Potential to Emit**

The table below summarizes the total limited potential to emit of the significant emission units.

Process/ facility	Limited Potential to Emit (tons/year)						HAPs
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	
Loading Rack Point Fugitive				81.78 29.12			16.89 tons per year of any combination of HAPs and 8.89 tons for MTBE
Gasoline Storage Tanks T257,T259, T501,T502, T554,T556, T802,T1351, andT1352				36.20			
Insignificant				4.57			
<b>Total Emissions</b>				151.66			16.89 tons per year of any combination of HAPs and 8.89 tons for MTBE

**County Attainment Status**

The source is located in Marion County.

Pollutant	Status
TSP	Nonattainment
PM-10	unclassified
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	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.

## Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

## Federal Rule Applicability

### Subpart K Standards of Performance for Storage Vessels

- (a) The storage tank T1352 is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60, Subpart K) since this tank has a storage capacity greater than 40,000 gallons and was installed after June 11, 1973 and prior to May 19, 1978.

Pursuant to 40 CFR 60.112(a)(1) tank T1352 is required to be equipped with a floating roof. Pursuant to 40 CFR 60.113(a) the source is required to keep records of the petroleum liquid stored, the storage period, and the maximum true vapor pressure of that liquid during the respective storage period.

- (b) This NSPS does not apply to the remaining tanks at the source due to capacity and/or date of construction.

### Subpart Kb Standards of Performance for Storage Vessels

- (a) The storage tanks T501 and T502 are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60, Subpart Kb) since these tanks have a storage capacity greater than 151 m<sup>3</sup>, store volatile organic liquid (VOL) with a maximum true vapor pressure greater than 5.2kPa and were constructed after July 23, 1984.

Pursuant to 40 CFR Part 60.112b(a) these tanks are required to be equipped with internal floating roofs.

Pursuant to 40 CFR Part 60.113(a)(2), the Permittee is required to visually inspect the internal floating roof and seals through manholes and roof hatches at least every 12 months and each time the vessel is emptied and degassed. Pursuant to 60.115(b) the Permittee is required to maintain record of such inspection.

Pursuant to 40 CFR 60.116b(b) the Permittee shall keep records showing the dimensions of the storage vessel and an analysis showing the capacity of the vessel for the life of the source. Pursuant to 40 CFR 60.116b(c) the Permittee shall keep maintain records of the VOL stored, the storage period, and the maximum true vapor pressure of that VOL during the respective storage period.

- (b) Storage Tank 0-7-1 is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60, Subpart Kb) since this tank has a storage capacity greater than 151 m<sup>3</sup>, store volatile organic liquid (VOL) with a maximum true vapor pressure greater than 3.5kPa and was constructed after July 23, 1984.

Since the maximum true vapor pressure is less than 5.2 kPa the only applicable requirement is to keep records pursuant to 40 CFR Part 60.116b(c) and to submit notification to the administrator pursuant to 40 CFR Part 60.116b(d) if the maximum true vapor pressure of the liquid stored exceeds 5.2 kPa.

- (c) This NSPS does not apply to the T1351, T257, T259, T554, T556, T802, AA-10-1, AA-10-2, T-1 and T-2 due to capacity and/or date of construction.

#### Subpart XX Standard of Performance for Bulk Gasoline Terminals

The Loading Rack with three lanes, is subject to the requirements of New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.500, Subpart XX) since the rack was constructed after December 17, 1980.

Pursuant to 40 CFR Part 60.502(b) the emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded. Based on the results from stack testing conducted in January of 1993 the VOC emissions from the VRU were 3.73 milligrams per liter of gasoline loaded.

Pursuant to 40 CFR 60.505(a) and (b) the Permittee is required to maintain records to assure gasoline is only loaded into vapor tight trucks.

Pursuant to 40 CFR Part 60.505(c) the Permittee is required to keep records of monthly leak inspections.

This source conducted the initial stack testing on January 20, 1993. Based on the result from this test this sources appear to be in compliance with the limit of 35 milligrams of VOC emitted per liter of gasoline loaded.

#### 40 CFR Part 63 Subpart R National Emission Standard for Gasoline Distribution Facilities

The Permittee shall limit the throughput gasoline products as specified below such that the requirements National Emissions Standards for Gasoline Distribution Facilities 40 CFR Part 63 Subpart R shall not apply;

- 1) the throughput of normal gasoline and oxygenated/reformulated gasoline with MTBE combined shall not exceed 560,000,000 gallons per twelve (12) consecutive month period, rolled monthly, and
- 2) the throughput of oxygenated/reformulated gasoline with MTBE shall not exceed 199,117,756 gallons per twelve (12) consecutive month period, rolled monthly.

This limit is equivalent to 9 tons of any single HAP per twelve (12) consecutive month period and 17 tons of any combination of HAPs twelve (12) consecutive month period (see emissions calculations in appendix A page 3 of 5).

### Emissions Offsets Regulation 326 IAC 2-3 and 40 CFR Part 51

Marion County was designated as nonattainment for Ozone at the time of installation, the project was reviewed under the Emissions Offsets Regulation 326 IAC 2-3 and 40 CFR Part 51. During the initial review it was determined that the Emissions Offsets regulation was not applicable based on the following information;

- 1) The existing source (Marathon Oil Refinery) was classified as a major source of VOCs,
- 2) The installation of the new loading rack coincided with the shutdown of an existing loading rack at the source.
- 3) At the time of the review it was determined that the net increase in emissions over the contemporaneous time period was estimated to be 14 tons of VOCs, therefore the emissions offset regulation was determined not to be applicable.

This evaluation was made during the review of construction permit 920051-01 issued on January 31, 1992. There have been no changes to the loading rack that would effect the sources potential to emit. Since this permit was issued the Marion County was redesignated as attainment for Ozone.

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

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

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOCs 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)

This source is subject to the requirements of 326 IAC 8-4-3 because the storage capacities of storage tanks T1351, T1352, T257, T259, T501, T502, T554, T556, and T802,, and are greater than 39,000 gallons and are storing volatile organic liquids with a true vapor pressure greater than 10kPa (1.52 psia). Storage tanks T257, T501, T502, T554, T556, T802, and T1352 are required to be equipped with internal floating roofs which meet the requirements of 326 IAC 8-4-3(b). Storage tanks T259 and T1351 are required to meet the requirements for external floating roofs pursuant to 326 IAC 8-4-3(c).

326 IAC 8-4-4 (Bulk Gasoline Terminals)

The requirements of 326 IAC 8-4-4 applies to all bulk gasoline terminals, as defined in 326 IAC 1-2-8. The VOC emissions are limited to 80 milligrams per liter of gasoline dispensed at the exhaust of the VRU or Flare. The NSPS limitation of 35 milligrams per liter satisfies this requirement. The VOC emissions from the loading of gasoline tanker trucks shall be controlled by either a carbon adsorber or a flare as a backup unit.

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

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

**Compliance Requirements**

Permits issued under 326 IAC 2-7 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 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

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

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

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

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

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

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

- (c) Each calendar month, the vapor collection system, the vapor control system, and each loading rack that loads gasoline tank trucks shall be inspected for total organic compounds liquid or vapor leaks during product transfer operations. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. [40 CFR Part 60.502(j)] [326 IAC 8-4-9(d)]

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

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 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) Part 70 Application Form GSD-08.

- (a) This source has accepted federally enforceable emission limits of 9 tons for any single HAP and 24 ton for any combination of HAPs per twelve consecutive month period.
- (b) See attached calculations for detailed air toxic calculations (page 3 of 5 in Appendix A).

### **Conclusion**

The operation of this stationary Petroleum Products Distribution Terminal shall be subject to the conditions of the attached proposed Part 70 Permit No. T097-7351-00159.

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for Part 70 Operating Permit

**Source Name:** Marathon Ashland Petroleum LLC  
**Source Location:** 4955 Robison Road, Indianapolis, Indiana 46268  
**County:** Marion  
**SIC Code:** 5171  
**Operation Permit No.:** T097-7351-00159  
**Permit Reviewer:** Mr. Patrick Coughlin

On April 8, 1998, the Indianapolis Environmental Resources Management Division (ERMD) had a notice published in the Indianapolis Star Newspaper, Indianapolis, Indiana, stating that Marathon Ashland Petroleum LLC had applied for a Part 70 Operating Permit to operate a petroleum products distribution terminal. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit 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 permit should be issued as proposed.

On May 11, 1998, Marathon Ashland Petroleum LLC submitted comments on the proposed Part 70 Permit. The summary of the comments is as follows:

#### **Comment 1:**

Condition D.2.3 imposes an operating restriction that the terminal tankage may not be used as a "pipeline breakout station" for products to be used at another terminal. While this is not the normal operation at the Indianapolis terminal, occasionally products are temporarily stored at this facility and subsequently pumped to the speedway terminal. In order to maintain this needed flexibility, we request that condition D.2.3 be dropped. As an alternative, the 550 million gallon per year gasoline throughput limit on the loading rack could be extended to include the tanks. This would cap tank emissions and still give us the option to direct the product either to the loading rack or to another terminal.

#### **Response to Comment 1:**

ERMD has deleted condition D.2.3 (please note that conditions following the deleted condition D.2.3 have been renumbered and all references to this former condition D.2.3 have been deleted from the permit) and revised condition D.1.2 to include the total throughput from the loading rack and tanks. Condition D.1.2 has been revised to read as follows;

#### "D.1.2 Hazardous Air Pollutant Emissions [40 CFR Part 63.420][326 IAC 20]"

*The Permittee shall limit the total throughput of gasoline products through the loading rack and tanks as specified below such that the requirements National Emissions Standards for Gasoline Distribution Facilities 40 CFR Part 63 Subpart R shall not apply;*

- 1) *the throughput of normal gasoline and oxygenated/reformulated gasoline with MTBE combined shall not exceed 560,000,000 gallons per twelve (12) consecutive month period, rolled monthly, and*
- 2) *the throughput of oxygenated/reformulated gasoline with MTBE shall not exceed 199,117,756 gallons per twelve (12) consecutive month period, rolled monthly.*

*This limit is equivalent to 9 tons of any single HAP per twelve (12) consecutive month period and 17 tons of any combination of HAPs twelve (12) consecutive month period."*

**Comment 2:**

- a) Condition D.2.5 - Requires seal gap measurements to verify compliance with standards found in Condition D.2.2(b)(3). The standard requires that the cumulative gap must be less than 1.0 square inches per foot of tank diameter with vapor mounted primary seals, but makes no mention of a standard for tanks with liquid mounted or mechanical shoe primary seals. Is this part of the standard applicable to any primary seal type or only to those with vapor mounted primary seals?
- b) Likewise, the standard sets a maximum allowable secondary gap of ½ inch for welded tanks, but does not indicate the primary seal type corresponding to the requirement. Is this part of the standard applicable to any primary seal type or only to those tanks with vapor mounted primary seals?
- c) Lastly, Condition 2.4 does not indicate the frequency for performing the required gap measurements. Based on condition D.2.6(b), this appears to be an annual requirement. Please confirm and indicate if there is a specific timing requirement, i.e. prior to May 1.

**Response to Comment 2:**

- a) The portion of Condition D.2.2(b)(3) which state that cumulative gap must be less than 1.0 square inches per foot of tank diameter only applies to tanks using vapor mounted primary seals.
- b) The portion of Condition D.2.2(b)(3) which sets a maximum allowable secondary gap of ½ inch for welded tanks is applicable to all primary seal types.

ERMD has revised condition D.2.2(b) to provide needed clarity. The revised condition reads as follows:

*“(b) All seal closure devices meet the following requirements:*

- (1) there are no visible holes, tears, or other openings in the seal(s) or seal fabric;*
- (2) the seal(s) are intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall.*
- (3) for vapor mounted primary seals, the accumulated gap area around the circumference of the secondary seal where a gap exceeding one-eighth (1/8) inch exists between the secondary seal and the tank wall shall not exceed 1.0 square inch per foot of tank diameter.*
- (4) there shall be no gaps exceeding one-half (1/2) inch between the secondary seal and the tank wall of welded tanks and no gaps exceeding one (1) inch between the secondary seal and the tank wall of riveted tanks.”*

In addition, the description of the individual tanks in Section D.2 and Section A have been revised to include the types of seals, the construction of the tank and the type of roof.

- c) Condition D.2.6(a) requires a visual inspection semiannually of the internal floating roof tanks to determine compliance with condition D.2.2. Condition D.2.6(b) requires annual measurement of the secondary seals, only if the external floating roof tank is equipped with a primary vapor mounted seal, to ensure compliance with Condition D.2.2(b)(3). There is no specific timing requirements as to when these inspections/measurements are to be conducted as long as these inspections/measurements are conducted at the appropriate frequency. To provide some additional clarity condition D.2.6 has been revised to read as follows:

**D.2.6 Inspection Requirements for External Floating Roof Tanks**

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*The permittee shall:*

- (a) *Perform a visual inspection semiannually (including visual inspection of the secondary seal gap) necessary for ensuring compliance with Condition D.2.2 of this permit; and*
- (b) *Perform measure the secondary seal gap annually according to the procedure described in Condition D.2.4 to ensure compliance with Condition D.2.2(b)(3).*

On April 27, 1998 and May 11, 1998, IDEM, OAM submitted comments on the proposed Part 70 Permit. The summary of the comments is as follows:

**Comment 1:**

Section D.1.1(l) the words in front of the first period do not make a complete sentence. If the period is to be changes to a comma, the description becomes redundant.

**Response to Comment 1:**

ERMD has revised this condition for clarity.

**Comment 2:**

Section A.2(1), D.1 (process description), and the TSD (process description) should have the maximum permitted capacity listed as it is spelled out in section D.1.2.

**Response to Comment 2:**

ERMD listed the maximum capacity of the loading rack in the process description in Section A.1(1), Section D.1 and the TSD.

On June 2, 1998 IDEM, OAM requested ERMD to make changes to the standard permit language as specified below. ERMD has incorporated these changes into the permit per IDEM's request.

**1. Deletion of Permit Condition A.5 Prior Permits Superseded.**

**2. Revision to Permit Condition B.14 to read as follows:**

***"B.14 Permit Shield [326 IAC 2-7-15]***

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- (a) *This condition provides a permit shield as addressed in 326 IAC 2-7-15.*
- (b) *Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:*
  - (1) *The applicable requirements are included and specifically identified in this permit, or;*
  - (2) *The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.*

- (c) *If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, and ERMD shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.*
- (d) *No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.*
- (e) *Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:*
  - (1) *The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;*
  - (2) *The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;*
  - (3) *The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and*
  - (4) *The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.*
- (f) *This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).*
- (g) *This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, and ERMD has issued the modifications. [326 IAC 2-7-12(c)(7)]*
- (h) *This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, and ERMD has issued the modification. [326 IAC 2-7-12(b)(8)]"*

**3. Addition of Condition B.29 Creditable Evidence which reads as follows:**

"B.29 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 Federal Register 8313]  
*Notwithstanding the conditions of this permit specifying practices for applicable requirements, other credible evidence may also be used to establish compliance or noncompliance with applicable requirements."*

**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)  
 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)  
 GFE = fugitive emissions from leaks in transports and VRU (gasoline, tons/yr)

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

Data Inputs (12 month rolling sum)
560,000,000.00
35
98.70%
0.2642
2.2046E-06
8.00
0.02

2,240.00
81.78
29.12

110.90
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NSPS Limit

AP-42 (4.4941 psia, submerged loading vapor balance service )  
 AP-42 (0.0052 psia, submerged loading deticated normal service)

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
1351	Gasoline	Ext. Floating Roof	5,670,000	1959
1352	Gasoline	Int. Floating Roof	5,670,000	1976
257	Gasoline	Int. Floating Roof	764,862	1955
259	Gasoline	Ext. Floating Roof	470,400	1955
501	Gasoline	Int. Floating Roof	1,851,402	1991
502	Gasoline	Int. Floating Roof	1,838,886	1991
554	Gasoline	Int. Floating Roof	1,909,992	1948
556	Gasoline	Int. Floating Roof	1,909,992	1950
802	Gasoline	Int. Floating Roof	2,473,044	1952

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

Storage Tanks ID	Tank Volumes (gal)	Turnovers	Throughput (Gal)	Withdrawl Loss	Withdrawl Loss (lbs/1000 gal)	Standing Loss
1351	5,670,000	50	283,500,000	313	0.0011	10,020
1352	5,670,000	50	283,500,000	388	0.0014	10,273
257	764,862	50	38,243,100	138	0.0036	4,010
259	470,400	50	23,520,000	142	0.0060	6,295
501	1,851,402	50	92,570,100	193	0.0021	7,150
502	1,838,886	50	91,944,300	193	0.0021	7,150
554	1,909,992	50	95,499,600	222	0.0023	9,815
556	1,909,992	50	95,499,600	212	0.0022	9,859
802	2,473,044	50	123,652,200	285	0.0023	8,454
				2,087		69,016

Maximum Gasoline throughput (gal/yr)	560,000,000.00
Maximum withdrawl loss (lbs/1000 gal)	0.0060
Maximum emissions from Withdrawl Loss (lbs/yr)	3,382.62
Standing Loss for Gasoline, (lbs/yr)	69,016.25
Total Emissions form Gasoline (tons/yr)	36.20

**HAP Emissions Estimates**

Source of Emissions	Tons of VOCs	lbs VOC/1000 gal
VRU (see page 1)	110.90	0.3961
Tanks (see page 2)	36.20	NA
Insignificant (Provided by applicant)	4.57	NA
Total	151.66	NA

Throughput of Normal Gasoline	560,000,000.00
Limited throughput of Oxygenated/Reformulated Fuel with MTBE	199,117,756.75

$$199,117,756 \text{ gal} = (A - (B \times D)) / (C / 1000 \text{ gal} \times \text{ton} / 2000 \text{ lbs} \times D)$$

Where

A = The limited PTE for any single HAP, 9 tons of MTBE per year

B = The potential emissions of VOC from storage tanks, 36.20 tons of VOC per year (see page 2 of 3)

C = The total VOC emissions rate including fugitives from the loading rack in pounds of VOC per 1000 gallons of gasoline loaded, 0.3961 lbs/1000 gal

D = The emissions factor for oxygenated/reformulated gasoline, 0.119 pounds of MTBE per pound of VOCs emitted

HAP	Emissions Factors			Potential Emissions (tons/yr)	Limited PTE			
	Normal Gasoline (% HAP)	Oxygenated Gasoline with MTBE (% HAP)	Maximum (% HAP)		VRU (tons/yr)	Tanks (tons/yr)	Insignificant (tons/yr)	Total (tons/yr)
Hexane	1.6	1.4	1.6	2.43	1.77	0.58	0.07	2.43
Benzene	0.9	0.7	0.9	1.36	1.00	0.33	0.04	1.36
Toluene	1.3	1.1	1.3	1.97	1.44	0.47	0.06	1.97
2,2,4 Trimethylpentane	0.8	0.7	0.8	1.21	0.89	0.29	0.04	1.21
Xylene	0.5	0.4	0.5	0.76	0.55	0.18	0.02	0.76
Ethylbenzene	0.1	0.1	0.1	0.15	0.11	0.04	0.00	0.15
MTBE	0	11.9	11.9	18.05	4.69	4.31	0.00	9.00
				25.93				16.89

Emissions Factors are from EPA Background Information for the Proposed Gasoline Distribution MACT Standard EPA-435/R-94-002a

Potential emission rates are based on the controlled VOC emissions rate (see pages 1 and 2) and the worst case HAP emission factors for each HAP.

151.66 tons VOC x 1.6% = 2.43 tons of Hexane  
 151.66 tons VOC x 0.9% = 1.36 tons of Benzene  
 151.66 tons VOC x 1.3% = 1.97 tons of Toluene  
 151.66 tons VOC x 0.8% = 1.21 tons of 2,2,4 Trimethylpentane  
 151.66 tons VOC x 0.5% = 0.76 tons of Xylene  
 151.66 tons VOC x 0.1% = 0.15 tons of Ethylbenzene  
 151.66 tons VOC x 11.9% = 18.05 tons of MTBE

Limited PTE rates were calculated the same as the potential HAP emissions for all pollutants except MTBE, The limited PTE for MTBE was based on a limited throughput of oxygenated gasoline.

$$4.69 \text{ tons of MTBE} = A \times B / 1000 \times \text{ton} / 2000 \text{ lbs} \times C$$

Where

A = Limited throughput of oxygenated gasoline with MTBE, 199,117,756 gallons per year

B = The total VOC emissions rate including fugitives from the loading rack in pounds of VOC per 1000 gallons of gasoline loaded, 0.3961 lbs/1000 gal

C = The emissions factor for oxygenated/reformulated gasoline, 0.119 pounds of MTBE per pound of VOCs emitted

**Insignificant Emitting Activities**

Insignificant	Estimation Method	Potential Emissions (tons/yr)
Ethanol Tank 0-7-1	Tanks II Prog.	0.25
Additive Tank AA-10-1	Tanks II Prog.	0.69
Additive Tank AA-10-2	Tanks II Prog.	0.21
Transmix Tank T-1	Tanks II Prog.	0.56
Transmix Tank T-2	Tanks II Prog.	0.56
Fugitive (valves, Flanges ect..)	API Pub. 4588 May 1993	2.3
		4.57

**Source Wide Emissions**

	Limited PTE (tons/yr)	Potential Emissions (tons/yr)
Loading Rack	29.12	2240.00
VRU	81.78	NA
Storage Tanks	36.20	36.20
Insignificant	4.57	4.57
	151.66	2280.77

HAP	Potential Emissions (tons/yr)	Limited PTE (tons/yr)
Hexane	2.43	2.43
Benzene	1.36	1.36
Toluene	1.97	1.97
2,2,4 Trimethylpentane	1.21	1.21
Xylene	0.76	0.76
Ethylbenzene	0.15	0.15
MTBE	18.05	9.00
	25.93	16.89