

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Phillips Pipe Line Company
400 East Columbus Drive
East Chicago, Indiana 46132**

(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.

Operation Permit No.: T089-7520-00326	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	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 presented in the permit application.

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

The Permittee owns and operates a stationary bulk liquid fuel storage and transfer terminal.

Responsible Official	D. R. DuBois, Vice President
Source Address:	400 East Columbus Drive, East Chicago, Indiana 46132
Mailing Address:	362 Adams Building, Bartlesville, Oklahoma 74004
SIC Code:	5171
County Location:	Lake
County Status:	Attainment for CO and Lead Primary Nonattainment for TSP and SO ₂ Moderate Nonattainment for PM-10 Severe Nonattainment for ozone
Source Status:	Part 70 Permit Program Major Source, under Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) 813,624 gallon external floating roof gasoline storage tank, identified as T-201, with primary and secondary seals, constructed in 1939;
- (b) One (1) 653,100 gallon external floating roof gasoline storage tank, identified as T-202, with primary and secondary seals, constructed in 1939;
- (c) One (1) 616,938 gallon internal floating roof gasoline storage tank, identified as T-204, with a primary seal, constructed in 1939;
- (d) One (1) 630,252 gallon internal floating roof gasoline storage tank, identified as T-207, with a primary seal, constructed in 1946;
- (e) One (1) 1,465,002 gallon geodesic dome gasoline storage tank, identified as T-401, with a primary seal, constructed in 1952
- (f) Two (2) 2,956,380 gallon external floating roof gasoline storage tanks, identified as T-801 and T-802, both with primary and secondary seals, both constructed in 1939;
- (g) One (1) 2,759,316 gallon external floating roof gasoline storage tank, identified as T-803, with primary and secondary seals, constructed in 1939;
- (h) One (1) 2,853,732 gallon external floating roof gasoline storage tank, identified as T-804, with primary and secondary seals, constructed in 1939;
- (i) One (1) 2,843,274 gallon external floating roof gasoline storage tank, identified as T-806, with primary and secondary seals, constructed in 1939;

- (j) Two (2) 2,857,890 gallon geodesic dome gasoline storage tanks, identified as T-809 and T-810, each with a primary seal, both constructed in 1952;
- (k) One (1) 696,695 gallon internal floating roof gasoline/transmix (a gasoline/distillate oil mixture) storage tank, identified as T-209, with a primary seal, constructed in 1946;
- (l) One (1) 3,055,543 gallon external floating roof gasoline/transmix storage tank, identified as T-805, with primary and secondary seals, constructed in 1939;
- (m) One (1) 2,841,552 gallon geodesic dome gasoline/transmix storage tank, identified as T-808, with a primary and seal, constructed in 1952;
- (n) Two (2) 15,204 gallon horizontal fixed roof gasoline additive storage tanks, identified as T-1501 and T-1502, both constructed in 1940;
- (o) One (1) 739,830 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-208, constructed in 1946;
- (p) One (1) 964,824 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-240, constructed in 1968;
- (q) One (1) 8,633,646 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2101, constructed in 1955;
- (r) One (1) 8,618,190 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2102, constructed in 1955;
- (s) One (1) 10,847,424 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2601, constructed in 1960;
- (t) One (1) 10,835,328 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2602, constructed in 1960;
- (u) Two (2) 635,040 gallon vertical fixed roof distillate/kerosene storage tanks, identified as T-205 and T-206, constructed in 1939;
- (v) One (1) 3,419,559 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-807, constructed in 1939;
- (w) VOC emissions from liquid fuel loading rack, controlled by a vapor combustion unit, identified as VCU;
- (x) VOC emissions from liquid fuel loading rack, identified as RACK, with a maximum capacity of loading 324,000 gallons of liquid fuel per hour, and controlled by a vapor recovery unit, identified as VCU;
- (y) One (1) VOC fractionator for separating gasoline and fuel oil of transmix tanks, identified as FRACT, which vents 125 cubic feet of VOC vapor per minute during intermittent pressure relief with venting gas being controlled by VCU, and equipped with a 7.0 million British thermal units per hour natural gas fired reboiler;
- (z) Fugitive emissions at loading rack;

- (aa) One (1) vapor combustion unit (VCU), used for controlling VOC emissions from loading rack gasoline transfer, installed in 1997 to replace the then existing vapor recovery unit to improve VOC control efficiency, equipped with a natural gas fired 1.6 million British thermal units per hour Petro-Chem furnace.

- (bb) A wastewater handling and treatment system, capable of treating 420,000 gallons of contaminated water per hour, including the following activities:
 - (1) Five (5) sumps for wastewater from tank water draw and roof drains;
 - (2) One (1) sump for wastewater from loading rack;
 - (3) One (1) 8,946 gallon internal floating roof waste water/gasoline storage tank, identified as T-103, constructed in 1939;
 - (4) One (1) oil/water separator, identified as Separator No. 1, with a capacity of 1,800 gallons per hour; and
 - (5) One (1) air stripper capable of processing 9,000 gallon of water per hour.

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

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

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

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);

- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

- (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]

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

B.3 Permit Term [326 IAC 2-7-5(2)]

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

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

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM .

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

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

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

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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, 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, along with a claim of confidentiality under 326 IAC 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

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, 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, 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]

- (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, upon request and shall be subject to review and approval by IDEM, OAM, .

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

- (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, 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

- (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

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, 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, 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]

- (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, 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, 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, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

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)]

- (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

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]

- (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, 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, 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, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, 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]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, 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

- (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, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM, , 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, , 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, , 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, 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]

- (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, , 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]

- (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. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM, 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)]

- (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)]

- (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)]

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]

(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 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

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, 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]

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.

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, 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)]

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, 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, 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, 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.
- (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 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

B.30 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 2-3 (Emission Offset), 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 twenty percent (20%) 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.

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]

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 Fugitive Dust Emissions [326 IAC 6-1-11.1]

The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%). Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 9.

C.7 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 units vented to the control equipment are in operation, as described in Section D of this permit.

C.8 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

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

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (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

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.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Will continue to comply with such requirements that become effective during the term of this permit; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Has certified that all facilities at this source are in compliance with all applicable requirements.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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.12 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 one (1) hour 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.13 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.14 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

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

All required notifications shall be submitted to:

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

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

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

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.
- (c) If the ERP is disapproved by IDEM, OAM, , the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, , shall supply such a plan.
- (d) 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.
- (e) 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.

- (f) Upon direct notification by IDEM, OAM, , 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.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM, . 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.18 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, 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 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 within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM 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.19 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]

- (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
- (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, on or before the date it is due.

C.20 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 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.21 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, 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.22 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

- (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, 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.23 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

- (a) One (1) 813,624 gallon external floating roof gasoline storage tank, identified as T-201, with primary and secondary seals, constructed in 1939;
- (b) One (1) 653,100 gallon external floating roof gasoline storage tank, identified as T-202, with primary and secondary seals, constructed in 1939;
- (c) One (1) 616,938 gallon internal floating roof gasoline storage tank, identified as T-204, with a primary seal, constructed in 1939;
- (d) One (1) 630,252 gallon internal floating roof gasoline storage tank, identified as T-207, with a primary seal, constructed in 1946;
- (e) One (1) 1,465,002 gallon geodesic dome gasoline storage tank, identified as T-401, with a primary seal, constructed in 1952;
- (f) Two (2) 2,956,380 gallon external floating roof gasoline storage tanks, identified as T-801 and T-802, both with primary and secondary seals, both constructed in 1939;
- (g) One (1) 2,759,316 gallon external floating roof gasoline storage tank, identified as T-803, with primary and secondary seals, constructed in 1939;
- (h) One (1) 2,853,732 gallon external floating roof gasoline storage tank, identified as T-804, with primary and secondary seals, constructed in 1939;
- (i) One (1) 2,843,274 gallon external floating roof gasoline storage tank, identified as T-806, with primary and secondary seals, constructed in 1939;
- (j) Two (2) 2,857,890 gallon geodesic dome gasoline storage tanks, identified as T-809 and T-810, each with a primary seal, both constructed in 1952;
- (k) One (1) 696,695 gallon internal floating roof gasoline/transmix (a gasoline/distillate oil mixture) storage tank, identified as T-209, with a primary seal, constructed in 1946;
- (l) One (1) 3,055,543 gallon external floating roof gasoline/transmix storage tank, identified as T-805, with primary and secondary seals, constructed in 1939;
- (m) One (1) 2,841,552 gallon geodesic dome gasoline/transmix storage tank, identified as T-808, with a primary and seal, constructed in 1952;
- (n) Two (2) 15,204 gallon horizontal fixed roof gasoline additive storage tanks, identified as T-1501 and T-1502, both constructed in 1940;
- (o) One (1) 739,830 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-208, constructed in 1946;
- (p) One (1) 964,824 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-240, constructed in 1968;
- (q) One (1) 8,633,646 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2101, constructed in 1955;
- (r) One (1) 8,618,190 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2102, constructed in 1955;
- (s) One (1) 10,847,424 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2601, constructed in 1960;
- (t) One (1) 10,835,328 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2602, constructed in 1960;
- (u) Two (2) 635,040 gallon vertical fixed roof distillate/kerosene storage tanks, identified as T-205 and T-206, constructed in 1939;
- (v) One (1) 3,419,559 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-807, constructed in 1942; and
- (w) Cleaning of gasoline tanks.

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-4-3]

Tanks T-103, T-201, T-202, T-204, T-207, T209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809 and T-810 are subject to the requirements of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities). 326 IAC 8-4-3 requires the following:

(a) For External Fixed Roof Tanks

- (1) The facility must 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 equally effective alternative control which has been approved.
- (2) The facility is 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, are equipped with covers, lids, or seals such that:
 - (A) the cover, lid, or seal is in the closed position at all times except when in actual use;
 - (B) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;
 - (C) rim vents, if provided are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

(b) For External Floating Roof Tanks

The Permittee shall not store a petroleum liquid in that facility unless:

- (1) The facility has been fitted with:
 - (A) a continuous secondary seal extending from the floating roof to the tank wall (rim-mounted secondary seal); or
 - (B) a closure or other device approved by the commissioner which is equally effective.
- (2) All seal closure devices meet the following requirements:
 - (A) there are no visible holes, tears, or other openings in the seal(s) or seal fabric;
 - (B) the seal(s) are intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall;
 - (C) 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. There shall be no gaps exceeding on-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.

- (3) All openings in the external floating roof, except for automatic bleeder vents, rim space vents, and leg sleeves are:
 - (A) equipped with covers, seals, or lids in the closed position except when the openings are in actual use; and
 - (B) equipped with projections into the tank which remain below the liquid surface at all times.
- (4) Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;
- (5) Rim vents are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting; and
- (6) 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.1.2 Hazardous Air Pollutants (HAPs) [40 CFR Part 63.420]

The Permittee shall:

- (a) Limit amount of material handled by all storage tanks to the following:
 - (1) 2,007 million gallons of gasoline, with Tanks T-801 - T-810 (excluding T-807) handling 50% of the throughput;
 - (2) 789 million gallons of distillate fuel and all other non-gasoline materials.per twelve (12) month period, rolled on a monthly basis.
- (b) Limit gasoline tank cleaning to 432 hours per twelve (12) month period, rolled on a monthly basis.

These requirements, in conjunction with the limits established in Conditions D.2.3 and D3.1 shall limit the source wide total of the worst case single HAP to 7.0 tons, and total HAPs to 24 tons, per twelve (12) month period, rolled on a monthly basis. Therefore, the requirements of 40 CFR Part 63.420, Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

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

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

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the VOC and HAPs limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

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

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, The Permittee shall maintain records of the types of volatile petroleum liquid stored, the maximum true vapor pressure of the liquid as stored, and the results of the inspections performed on the storage vessels. Such records shall be maintained for a period of two (2) years and shall be made available to the commissioner upon written request.

- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the liquid fuel throughput limits established in Condition D.1.2.
 - (1) The amount and type of liquid fuel transferred through tanks;
 - (2) The number of hours for conducting gasoline tank cleaning; and
 - (3) A log of the dates of liquid transfers and tank cleaning.

- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A quarterly or summary of the information to document compliance with Condition D.1.2 shall be submitted to the address 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

- (x) VOC emissions from liquid fuel loading rack, identified as RACK, with a maximum capacity of loading 324,000 gallons of liquid fuel per hour, and controlled by a vapor recovery unit, identified as VCU;
- (y) One (1) VOC fractionator for separating gasoline and fuel oil of transmix tanks, identified as FRACT, which vents 125 cubic feet of VOC vapor per minute during intermittent pressure relief with venting gas being controlled by VCU, and equipped with a 7.0 million British thermal units per hour natural gas fired reboiler;
- (z) Fugitive emissions at the loading rack; and
- (aa) One (1) vapor combustion unit (VCU), used for controlling VOC emissions from loading rack gasoline transfer, installed in 1997 to replace the then existing vapor recovery unit to improve VOC control efficiency, equipped with a natural gas fired 1.6 million British thermal units per hour Petro-Chem furnace.

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-4-4]

Pursuant to 326 IAC 8-4-4 (Bulk Gasoline Terminals), the Permittee shall:

- (a) Equip the gasoline loading equipment with a vapor control system in good working order, which will control VOC emissions to the atmosphere from equipment being controlled to no more than 80 mg/liter of gasoline loaded.
- (b) Displace the vented vapor and gases only to the vapor control system.
- (c) Prevent liquid drainage from the loading device when it is not in use or accomplish complete drainage before the loading device is disconnected.
- (d) Equip all loading and vapor lines with fittings which make vapor-tight connections and which will be closed upon disconnection.

If employees of the owner of the source are not present during loading, it shall be the responsibility of the owner of the transport to make certain the vapor control system is attached to the transport. The owner of the source shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with this rule.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-9]

Pursuant to 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems; Records), the Permittee shall:

- (a) Ensure the following requirements are met, before allowing a gasoline transport subject to this rule to be filled or emptied:
 - (1) The gasoline transport is tested annually according to test procedures consistent with Appendix A of "Control of Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems", EPA-450/2-78-051, or equivalent procedure approved by the commissioner.

- (2) The gasoline transport sustains a pressure change of no more than seven hundred fifty (750) pascals in five (5) minutes when pressurized to a gauge pressure of four thousand five hundred (4,500) pascals or evacuated to a gauge pressure of one thousand five hundred (1,500) pascals during the testing required in D.1.3.(a)(1).
 - (3) The equipment is repaired by the owner or operator and retested within fifteen (15) days of testing if it does not meet the criteria of D.1.3.(a)(2).
 - (4) The gasoline transport displays a sticker which shows the date that the gasoline tank truck last passed the test required in D.1.3.(a)(1) through D.1.3.(a)(2). Such sticker shall be displayed near the Department of Transportation Certification Plate required by 49 CFR 178.340-10b.
- (b) The owner of the transport shall be responsible for compliance with subsection D.1.3.(a). The owner of the loading facility shall take all reasonable steps to ensure that transports loading at its facility comply with subsection (b), and shall, in all cases when its employees are present to supervise or perform loading, be responsible for compliance with D.1.3.(a)(4).
- (c) The Permittee shall:
- (1) Design and operate the applicable system and the gasoline loading equipment in a manner that prevents:
 - (A) gauge pressure from exceeding four thousand five hundred (4,500) pascals and a vacuum from exceeding one thousand five hundred (1,500) pascals in the tank gasoline truck;
 - (B) a reading equal to or greater than one hundred percent (100%) of the lower explosive limit (LEL, measured as propane) at two and five-tenths (2.5) centimeters from all points on the perimeter of a potential leak source when measured by the method referenced in Appendix B of "Control of Organic Compound leaks from Gasoline Tank Trucks and Vapor Collection Systems", EPA 450/2-78-051, or an equivalent procedure approved by the commissioner during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and
 - (C) avoidable visible liquid leaks during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals.
 - (2) Repair and retest a vapor collection or control system that exceeds the limits in D.1.3.(c)(1) within fifteen (15) days.
- (d) The OAM staff may, at any time monitor a gasoline tank truck, vapor balance referenced to confirm continuing compliance with subsection D.1.3.(a) or D.1.3.(b).
- (e) If the commissioner allows alternative test procedures in subsection D.1.3.(a)(1) or D.1.3.(c)(1)(B), such method shall be submitted to the U.S. EPA as a SIP revision.

D.2.3 Hazardous Air Pollutants (HAPs) [40 CFR Part 63.420]

The Permittee shall:

- (a) Limit amount of material handled by loading rack to the following:
 - (1) 320 million gallons of gasoline;
 - (2) 320 million gallons of distillate fuel; and
 - (3) 9.142 million gallons of ethanol;
- (b) Limit the venting of VOC from the fractionator, FRACT, to 2,760 minutes per twelve (12) month period, rolled on a monthly basis.
- (c) Operate the vapor combustion system, which has a capture efficiency of 98.7% and will emit no more than 35 mg VOC per liter of gasoline loaded, at all times when gasoline is being loaded at the loading rack or when VOC is venting from the fractionator.

These requirements, in conjunction with the limit established in Conditions D.1.2 and D.3.1 shall limit the source wide total of the worst case single HAP to 7.0 tons, and total HAPs to 24 tons, per twelve (12) month period, rolled on a monthly basis. Therefore, the requirements of 40 CFR Part 63.420, Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1)]

During the period between 18 and 24 months after issuance of this permit, the Permittee shall confirm compliance with the VOC capture and control requirements listed in D.2.3(b), using the testing procedures approved by the commissioner.

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

D.2.6 Volatile Organic Compounds (VOC)

The Vapor Combustion Unit (VCU) for VOC control shall be in operation at all times, when the tank truck loading rack (ID RACK) is transferring gasoline or when the fractionator (ID FRACT) is venting vapor, and exhausting to the outside atmosphere.

D.2.7 Daily Visible Checks for Liquid Leaks

- (a) Daily checks for liquid leaks during loading or unloading operations of the truck loading rack, the vapor collection system and the vapor combustion unit shall be performed during normal daylight operations when the facility is in operation. A trained employee will record any visible liquid leaks and the date of such leaks.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, checks shall be taken during that part of the operation that would normally be expected to cause the greatest potential for liquid leaks.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of liquid leaks for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a liquid leak is observed.
- (f) All checks for visible liquid leaks made to comply with this condition shall be conducted in accordance with 326 IAC 8-4-9.

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

D.2.8 Record Keeping Requirements

- (a) Pursuant to 326 IAC 8-4-9, the Permittee shall maintain records of all certification testing and repairs. The records must identify the following:
 - (1) The gasoline tank truck, vapor collection system, or vapor control system.
 - (2) The date of the test or repair.
 - (3) If applicable, the type of repair and the date of retest.
- (b) To document compliance with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the liquid fuel throughput limits established in Condition D.2.3.
 - (1) The amount and type of liquid fuel transferred through loading rack
 - (2) The time, date and total length in minutes of VOC venting from the fractionator; and
 - (3) A log of the dates of liquid transfers and tank cleaning.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly or summary of the information to document compliance with Condition D.2.3 shall be submitted to the address 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.3 FACILITY OPERATION CONDITIONS

- (bb) A wastewater handling and treatment system, capable of treating 420,000 gallons of contaminated water per hour, including the following activities:
- (1) Five (5) sumps for wastewater from tank water draw and roof drains;
 - (2) One (1) sump for wastewater from loading rack;
 - (3) One (1) 8,946 gallon internal floating roof waste water/gasoline storage tank, identified as T-103, constructed in 1939;
 - (4) One (1) oil/water separator, identified as Separator No. 1, with a capacity of 1,800 gallons per hour; and
 - (5) One (1) air stripper capable of processing 9,000 gallon of water per hour.

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

D.3.1 Hazardous Air Pollutants (HAPs) [40 CFR 63.420]

The Permittee shall:

- (a) Limit the wastewater handled and treated to 31.1 millions gallons per twelve (12) month period, rolled on a monthly basis.
- (b) This requirement, in conjunction with the limit established in Conditions D.1.2 and D.2.3 shall limit the source wide total of the worst case single HAP to 7.0 tons, and total HAPs to 24 tons, per twelve (12) month period, rolled on a monthly basis. Therefore, the requirements of 40 CFR Part 63.420, Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the VOC and HAP limits specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

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

D.3.3 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records of the actual monthly throughput wastewater handled and treated;
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address 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.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Phillips Pipe Line Company
Source Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Mailing Address: 362 Adams Building, Bartlesville, Oklahoma 74004
Part 70 Permit No.: T089-7520-00326

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**

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

Source Name: Phillips Pipe Line Company
Source Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Mailing Address: 362 Adams Building, Bartlesville, Oklahoma 74004
Part 70 Permit No.: T089-7520-00326

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	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

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 ₂ , VOC, NO _x , 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

Part 70 Quarterly Report

Source Name: Phillips Pipe Line Company
 Source Address: 400 East Columbus Drive, East Chicago, Indiana 46312
 Mailing Address: 362 Adams Building, Bartlesville, Oklahoma 74004
 Part 70 Permit No.: T089-7520-00326
 Facility: Storage Tanks
 Parameter: Gallons of Liquid Fuel Handled and Hours of Gasoline Tank Cleaning
 Limit: (1) 2,007 million gallons of gasoline per twelve (12) month period, rolled on a monthly basis with Tanks T-801 - T-810 (excluding T-807) handling 50% of the throughput;
 (2) 789 million gallons of distillate fuel and all other non-gasoline materials per twelve (12) month period, rolled on a monthly basis; and
 (3) 432 hours per twelve (12) month period, rolled on a monthly basis of gasoline tank cleaning.

YEAR: _____

	Month	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
Gasoline Handled by T-801 - T-810 (1000 gallons)	Month 1			
	Month 2			
	Month 3			
Total Gasoline Handled (1000 gallons)	Month 1			
	Month 2			
	Month 3			
Non-Gasoline Fuels Handled (1000 gallons)	Month 1			
	Month 2			
	Month 3			
Gasoline Tank Cleaning (hours)	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

Part 70 Quarterly Report

Source Name: Phillips Pipe Line Company
 Source Address: 400 East Columbus Drive, East Chicago, Indiana 46312
 Mailing Address: 362 Adams Building, Bartlesville, Oklahoma 74004
 Part 70 Permit No.: T089-7520-00326
 Facility: Loading Rack (RACK) and Fractionator (FRACT)
 Parameter: Gallons of Liquid Fuel Handled
 Limit: (1) 320 million gallons of gasoline per twelve (12) month period, rolled on a monthly basis;
 (2) 320 million gallons of distillate fuel per twelve (12) month period, rolled on a monthly basis; and
 (3) 9.142 million gallons of ethanol per twelve (12) month period, rolled on a monthly basis;
 (4) Venting of VOC from fractionator, FRACT, for no more than 2,760 minutes per twelve (12) month period, rolled on a monthly basis

YEAR: _____

	Month	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
Gasoline Handled (1000 gallons)	Month 1			
	Month 2			
	Month 3			
Distillate Handled (1000 gallons)	Month 1			
	Month 2			
	Month 3			
Ethanol Handled (1000 gallons)	Month 1			
	Month 2			
	Month 3			
Fractionator VOC Venting (minutes)	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**

Part 70 Quarterly Report

Source Name: Phillips Pipe Line Company
 Source Address: 400 East Columbus Drive, East Chicago, Indiana 46312
 Mailing Address: 362 Adams Building, Bartlesville, Oklahoma 74004
 Part 70 Permit No.: T089-7520-00326
 Facility: Wastewater Treatment System
 Parameter: Gallons of Wastewater Handled and Treated
 Limit: 31.1 millions gallons per twelve (12) month period, rolled on a monthly basis.

YEAR: _____

	Month	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
Wastewater Handled and Treated (1000 gallons)	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**

**PART 70 OPERATING PERMIT
 QUARTERLY COMPLIANCE REPORT**

Source Name: Phillips Pipe Line Company
 Source Address: 400 East Columbus Drive, East Chicago, Indiana 46312
 Mailing Address: 362 Adams Building, Bartlesville, Oklahoma 74004
 Part 70 Permit No.: T089-7520-00326

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.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name: Phillips Pipe Line Company
Source Location: 400 East Columbus Drive, East Chicago, IN 46132
County: Lake
SIC Code: 5171
Operation Permit No.: T089-7520-00326
Permit Reviewer: Scott Pan / EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Phillips Pipe Line Company relating to the operation of a bulk liquid fuel storage and transfer terminal.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) 813,624 gallon external floating roof gasoline storage tank, identified as T-201, with primary and secondary seals, constructed in 1939;
- (b) One (1) 653,100 gallon external floating roof gasoline storage tank, identified as T-202, with primary and secondary seals, constructed in 1939;
- (c) One (1) 616,938 gallon internal floating roof gasoline storage tank, identified as T-204, with a primary seal, constructed in 1939;
- (d) One (1) 630,252 gallon internal floating roof gasoline storage tank, identified as T-207, with a primary seal, constructed in 1946;
- (e) One (1) 1,465,002 gallon geodesic dome gasoline storage tank, identified as T-401, with a primary seal, constructed in 1952;
- (f) Two (2) 2,956,380 gallon external floating roof gasoline storage tanks, identified as T-801 and T-802, both with primary and secondary seals, both constructed in 1939;
- (g) One (1) 2,759,316 gallon external floating roof gasoline storage tank, identified as T-803, with primary and secondary seals, constructed in 1939;
- (h) One (1) 2,853,732 gallon external floating roof gasoline storage tank, identified as T-804, with primary and secondary seals, constructed in 1939;
- (i) One (1) 2,843,274 gallon external floating roof gasoline storage tank, identified as T-806, with primary and secondary seals, constructed in 1939;

- (j) Two (2) 2,857,890 gallon geodesic dome gasoline storage tanks, identified as T-809 and T-810, each with a primary seal, both constructed in 1952;
- (k) One (1) 696,695 gallon internal floating roof gasoline/transmix (a gasoline/distillate oil mixture) storage tank, identified as T-209, with a primary seal, constructed in 1946;
- (l) One (1) 3,055,543 gallon external floating roof gasoline/transmix storage tank, identified as T-805, with primary and secondary seals, constructed in 1939;
- (m) One (1) 2,841,552 gallon geodesic dome gasoline/transmix storage tank, identified as T-808, with a primary and seal, constructed in 1952;
- (n) Two (2) 15,204 gallon horizontal fixed roof gasoline additive storage tanks, identified as T-1501 and T-1502, both constructed in 1940;
- (o) One (1) 739,830 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-208, constructed in 1946;
- (p) One (1) 964,824 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-240, constructed in 1968;
- (q) One (1) 8,633,646 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2101, constructed in 1955;
- (r) One (1) 8,618,190 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2102, constructed in 1955;
- (s) One (1) 10,847,424 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2601, constructed in 1960;
- (t) One (1) 10,835,328 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2602, constructed in 1960;
- (u) Two (2) 635,040 gallon vertical fixed roof distillate/kerosene storage tanks, identified as T-205 and T-206, constructed in 1939;
- (v) One (1) 3,419,559 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-807, constructed in 1939;
- (w) Cleaning of gasoline tanks;
- (x) VOC emissions from liquid fuel loading rack, identified as RACK, controlled by a vapor recovery unit, identified as VCU;
- (y) One (1) VOC fractionator, for separating gasoline and fuel oil of transmix tanks, identified as FRACT, with a capacity of processing 125 cubic feet of VOC vapor per minute, equipped with a 7.0 million British thermal units per hour natural gas fired reboiler, with venting gas being controlled by VCU;
- (z) Fugitive emissions at the loading rack; and

- (aa) A wastewater handling and treatment system, capable of treating 420,000 gallons of contaminated water per hour, including the following activities:
- (1) Five (5) sumps for wastewater from tank water draw and roof drains;
 - (2) One (1) sump for wastewater from loading rack;
 - (3) One (1) 8,946 gallon internal floating roof waste water/gasoline storage tank, identified as T-103, constructed in 1939;
 - (4) One (1) oil/water separator, identified as Separator No. 1, with a capacity of 1,800 gallons per hour; and
 - (5) One (1) air stripper capable of processing 9,000 gallon of water per hour.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

The source also consists of the following unpermitted facilities/units:

- (a) One (1) vapor combustion unit (VCU), used for controlling VOC emissions from loading rack gasoline transfer, installed in 1997 to replace the then existing vapor recovery unit to improve VOC control efficiency, equipped with a natural gas fired 1.6 million British thermal units per hour Petro-Chem furnace.

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units (Btu) per hour;
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 0.5 mmBtu/hr, except where total capacity of equipment operated by one stationary source exceeds 2.0 mmBtu/hr;
- (c) Combustion source flame safety purging on startup;
- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (e) VOC and HAP storage tanks with capacity less than or equal 1,000 gallons and annual throughputs less than 12,000 gallons;
- (f) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (g) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- (h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
- (i) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa, 15 mmHg, or 0.3 psi measured at 38°C; or

- (2) having a vapor pressure equal to or less than 0.7 kPa, 0.1 mmHg, or 0.1 psi measured at 20°C.

The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.;

- (j) The follow equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (k) Groundwater oil recovery wells;
- (l) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by weight;
- (m) Any operation using aqueous solvents containing less than 1% by weight of VOCs, excluding HAPs;
- (n) Heat exchanger cleaning and repair;
- (o) Process vessel degassing and cleaning to prepare for internal repairs;
- (p) Stockpiled soils from soil remediation activities that ar covered and waiting transportation for disposal;
- (q) Paved and unpaved roads and parking lots with public access;
- (r) Asbestos abatement projects regulated by 326 IAC 14-10;
- (s) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (t) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (u) Blowdown for any of the following:
sight glass, boiler, compressors, pumps, and cooling tower;
- (v) On-site fire and emergency response training approved by the department;
- (w) Gasoline generators not exceeding 110 horsepower;
- (x) Stationary fire pumps;
- (y) Purge double block and bleed valves;
- (z) Filter or coalescer media changeout;
- (aa) A laboratory as defined in 326 IAC 2-7-1(21)(B);

- (bb) Two (2) 36,414 gallon horizontal pressurized tanks, identified as T-4201 and T4202, both constructed in 1975;
- (cc) Three (3) pressurized spheroid tanks, identified as T-051, T-210 and T-301, each with a respective capacity of 197,400, 753,018 and 1,125,012 gallons, and each constructed in 1963, 1959 and 1961, respectively;
- (dd) Fugitive liquid and vapor emissions due to equipment leaks;
- (ee) Cleaning of non-gasoline tanks;
- (ff) One (1) oil/water separator, identified as Separator No. 2, with a capacity of 1,000 gallons per hour; and
- (gg) Piping pigging.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) CP-089-5213-00326 (an exemption letter), issued on April 9, 1996.
- (2) CP-089-3525-00326, issued on June 21, 1994, revised on July 28, 1994.
- (3) OP 45-05-93-0475, issued on January 24, 1990.
- (4) OP 45-05-93-0476, issued on January 24, 1990.
- (5) OP 45-05-93-0477, issued on January 24, 1990.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules..

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 October 24, 1997. Additional information was received on March 19, 1998.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (eight (8) pages).

Total Potential and Allowable Emissions for Units Reviewed Under ENSR

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	---	0.0
Particulate Matter (PM10)	---	0.0
Sulfur Dioxide (SO ₂)	---	0.0
Volatile Organic Compounds (VOC)	1.8	0.8
Carbon Monoxide (CO)	---	399.4
Nitrogen Oxides (NO _x)	---	82.3
Single Hazardous Air Pollutant (HAP)	---	0.0
Combination of HAPs	---	0.1

- (a) Potential emissions were determined using emission factors provided by the VCU manufacturer and maximum loading rack gasoline throughput. See attached spreadsheets (page 8 of 8 Appendix A) for detailed calculations.
- (b) Allowable emissions are determined from the applicability of rule 326 IAC 8-4-4. See attached spreadsheets (page 8 of 8 Appendix A) for detailed calculations.
- (c) The potential emissions before control are less than the allowable emissions, therefore, the potential emissions before control are used for the permitting determination.
- (d) Allowable emissions (as defined in the Indiana Rule) of CO and NO_x are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

Source Status

Existing Source PSD Definition (emissions after controls, based on *the emission* inventory from the AIRS Facility Quick Look Report)

Pollutant	Emissions (ton/yr)
PM	0.0
PM10	0.0
SO ₂	0.0
VOC	542.3
CO	0.0
NO _x	0.0

- (a) This existing source is a major stationary source because VOC is emitted at a rate of more than 25 tons per year and the source is located in Lake County.

Modification Due to Units Reviewed Under ENSR

PTE from the proposed modification (based on limited loading rack (RACK) gasoline throughput):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
New VCU	0.0	0.0	0.0	0.1	23.8	4.9
Old VRU	0.0	0.0	0.0	4.0	0.0	0.0
Net Emissions	0.0	0.0	0.0	-3.9	23.8	4.9
PSD or Offset Significant Level	25	15	40	40	100	40

- (a) CO and NOx emissions are limited to 23.8 and 4.9 tons/yr, respectively, therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply. This limit is equivalent to loading rack (RACK) gasoline throughput of 320 million gallons per 12 month period.

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	Less than 25
PM-10	Less than 25
SO ₂	Less than 100
VOC	Greater than 25
CO	Greater than 250
NO _x	Grater than 25

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)
Benzene	Less than 10
Hexane	Greater than 10
Isooctane	Greater than 10
MTBE	Greater than 10
Toluene	Greater than 10
Cumeme	Less than 10
Ethylbenzene	Less than 10
Naphthalene	Less than 10
Phenol	Less than 10
Methanol	Less than 10
Xylene	Less than 10
TOTAL	Greater than 25

- (a) The potential emissions (as defined in the Indiana Rule) of VOC and NO_x are equal to or greater than 25 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 the 1997 emission data provided by the applicant.

Pollutant	Actual Emissions (tons/year)
PM	0.0
PM-10	0.0
SO ₂	0.0
VOC	81.2
CO	0.5
Total HAPs	2.1
NO _x	2.6

Limited Potential to Emit

- (a) The source has accepted a federally enforceable limit on potential to emit single HAP of 9.4 tons per year, and total HAPs of 24 tons per year.
- (b) The table below summarizes the total limited potential to emit of the significant emission units.

Process/ facility	Limited Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Storage Tanks	0.0	0.0	0.0	121.0	0.0	0.0	4.0	12.1
Loading Rack	0.0	0.0	0.0	65.2	0.0	0.0	2.1	6.5
Wastewater Treatment	0.0	0.0	0.0	0.3	0.0	0.0	0.0	0.0
Tank Cleaning	0.0	0.0	0.0	10.2	0.0	0.0	0.3	1.0
Equipment Leak	0.0	0.0	0.0	5.3	0.0	0.0	0.2	3.7
Vapor Combustion Unit (VCU)	0.0	0.0	0.0	0.2	23.8	4.9	0.0	0.0
Air Stripper	0.0	0.0	0.0	0.6	0.0	0.0	0.1	0.6
Total Emissions	0.0	0.0	0.0	202.8	23.8	4.9	6.7**	24.0

** By limiting total HAPs emissions to 24 ton/yr, worst case single HAP emissions is limited to 6.7 tons/yr

County Attainment Status

The source is located in Lake County.

Pollutant	Status
TSP	Primary nonattainment
PM-10	Moderate nonattainment
SO ₂	Primary nonattainment
NO ₂	Attainment
Ozone	Severe nonattainment
CO	Attainment
Lead	Attainment

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

- (a) 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.
- (b) 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

326 IAC 12, (40 CFR Part 60.110, Subpart K; 40 CFR Part 60.110a, Subpart Ka; and 40 CFR Part 60.110b, Subpart Kb-Standards of Performance for Storage Vessels)

All the storage tanks at the source are not subject to the requirements of the New Source Performance Standard (NSPS), 326 IAC 12, (40 CFR Part 60.110, Subpart K, 60.110a, Subpart Ka, and 60.110b, Subpart Kb) "Standards of Performance for Volatile Organic Liquid Storage Vessels" because all the storage tanks at the source were constructed before June 11, 1973.

326 IAC 12, 40 CFR Part 60.500, Subpart XX (Standards of Performance for Bulk Gasoline Terminals)

The existing loading rack is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.500, Subpart XX) "Standards of Performance for Bulk Gasoline Terminals" because the loading rack was constructed in 1940 and reconstructed in 1979, which was prior to the December 17, 1980 applicability date, and was not modified or reconstructed since then. The VCU used for controlling VOC emissions from gasoline loading operations was installed in 1997 to replace the originally equipped vapor recovery unit (VRU) to improve control efficiency from 95% to 99%. Although the VCU installed increased both CO and NO_x emissions, the primary function of the unit is to control VOC emissions and the cost of the control device did not exceed 50% of an entire new loading rack. Pursuant to 40 CFR 60.14 (e)(5) and 40 CFR 60.15 (b)(1), this replacement of the VOC control device in 1997 is neither a modification nor a reconstruction under the definition in the NSPS.

326 IAC 20, 40 CFR Part 63.420, Subpart R (National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations))

This source is not subject to the requirements for Hazardous Air Pollutants, 326 IAC 20, (40 CFR Part 63.420, Subpart R), because the source will limit the potential to emit single HAP to 7.0 tons per year and the potential to emit total HAPs to 24 tons per year by the following material throughput limits and the control device:

- (a) Limit amount of material handled by loading rack to the following:
 - (1) 320 million gallons of gasoline per year;
 - (2) 320 million gallons of distillate fuel per year; and
 - (3) 9.142 million gallons of ethanol per year.
- (b) Operate the vapor combustion system, which has a capture efficiency of 98.7% and will emit no more than 35 mg VOC per liter of gasoline loaded, at all times when gasoline is being loaded at the loading rack.
- (c) Limit amount of material handled by all storage tanks to the following:
 - (1) 2,007 million gallons of gasoline per year, with Tanks T-801 -T-810 (excluding T-807) handling more than 50% of throughput;
 - (2) 789 million gallons of distillate fuel and all other non-gasoline materials per year.
- (d) Limit gasoline tank cleaning to 432 hours per year.
- (e) Limit amount of wastewater handled and treated to 31.1 millions gallons per year.

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 10 tons per year of VOC. 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 (2) (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions for sources located in Lake County shall meet the following limitations, unless otherwise stated in this permit:

- (a) visible emissions shall not exceed an average of twenty percent (20%) opacity in twenty-four (24) consecutive readings; and
- (b) visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to this rule, fugitive particulate matter emissions shall not be visible crossing property lines.

State Rule Applicability - Individual Facilities

326 IAC 6-1-2 (Nonattainment Area Particulate Matter Limitations)

The source is not subject to the requirements of 326 IAC 6-1-2, because the potential particulate matter (PM) emissions from the source are less than 100 tons per year and the actual PM emissions from the source are less than 10 tons per year.

326 IAC 6-1-10.1 (Lake County PM-10 Emission Requirements)

The source is not listed in 326 IAC 6-1-10(d). Therefore, pursuant to 326 IAC 6-1-10(a), the requirements of 326 IAC 6-1-10 do not apply.

326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements)

This source is subject to the control requirements of 326 IAC 6-1-11.1 for each facility and operation having a potential to emit five (5) tons per year or more of fugitive particulate matter. Pursuant to 326 IAC 6-1-11.1, the following particulate matter emission limitations apply:

- (a) Average instantaneous opacity of fugitive particulate emissions from paved and unpaved roads, parking lots, and from material transfer shall not exceed ten percent (10%) opacity;
- (b) A zero (0) percent frequency of visible emissions of materials during the inplant transportation of a material by truck or rail at any time;
- (c) Opacity of particulate emissions from dust handling equipment (i.e., equipment used to handle dust collected by control equipment) shall not exceed 10 percent opacity; and
- (d) Opacity of any facility or operation not specifically listed in 326 IAC 6-1-11.1 shall meet a 20 percent, three minute opacity standard.

The source will comply with these requirements by:

- (a) Applying water to all roads and parking lots on an as-needed basis.

326 IAC 6-3-2 (Particulate Emissions Limitations)

Limitations established by 326 IAC 6-3 do not apply if limitations established at 326 IAC 6-1 or 326 IAC 12 apply. Since the requirements of 326 IAC 6-1-11 apply to this source, 326 IAC 6-3 is not applicable.

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

Pursuant to 326 IAC 8-4-1, the petroleum liquid storage tanks with a capacity greater than 39,000 gallons containing volatile organic compounds whose true vapor pressure is greater than 1.52 pounds per square inch (psi) are subject to the requirements of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities). The rule requires that:

- (a) For External Fixed Roof Tanks
 - (1) The facility must 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 equally effective alternative control which has been approved.

- (2) The facility is 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, are equipped with covers, lids, or seals such that:
 - (A) the cover, lid, or seal is in the closed position at all times except when in actual use;
 - (B) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;
 - (C) rim vents, if provided are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

(b) For External Floating Roof Tanks

The owner of a facility subject to this subsection shall not store a petroleum liquid in that facility unless:

- (1) The facility has been fitted with:
 - (A) a continuous secondary seal extending from the floating roof to the tank wall (rim-mounted secondary seal); or
 - (B) a closure or other device approved by the commissioner which is equally effective.
- (2) All seal closure devices meet the following requirements:
 - (A) there are no visible holes, tears, or other openings in the seal(s) or seal fabric;
 - (B) the seal(s) are intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall;
 - (C) 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. There shall be no gaps exceeding on-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.
- (3) All openings in the external floating roof, except for automatic bleeder vents, rim space vents, and leg sleeves are:
 - (A) equipped with covers, seals, or lids in the closed position except when the openings are in actual use; and
 - (B) equipped with projections into the tank which remain below the liquid surface at all times.
- (4) Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;

- (5) Rim vents are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting; and
 - (6) 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.
- (c) Owners or operators of petroleum liquid storage vessels shall maintain records of the types of volatile petroleum liquid stored, the maximum true vapor pressure of the liquid as stored, and the results of the inspections performed on the storage vessels. Such records shall be maintained for a period of two (2) years and shall be made available to the commissioner upon written request.

Tanks T-1501 and T-1502 each has storage capacity of less than 39,000 gallons, and Tanks T-205, T-206, T-208, T-240, T-807, T-2101, T-2102, T-2601 and T-2602 each stores organic liquids with a true vapor pressure of less than 1.52 psi. Therefore, these storage tanks are not subject to the requirements of 326 IAC 8-4-3.

All storage tanks at the source, which are subject to the requirements of 326 IAC 8-4-3 (include T-103, T-201, T-202, T-204, T-207, T209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809 and T-810), are either external floating roof tanks with dome covers as well as primary and secondary seals, or internal floating roof tanks with closure seal or seals. Therefore, the source complies with the requirements of 326 IAC 8-4-3.

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

Pursuant to 326 IAC 8-4-1, the source is subject to the requirements of 326 IAC 8-4-4 (Bulk Gasoline Terminals) for the loading of gasoline into any transport, because it is located in Lake County. Gasoline transfers at the source shall not be permitted unless:

- (a) The gasoline loading equipment is equipped with a vapor control system in good working order, which will control VOC emissions to the atmosphere from equipment being controlled to no more than 80 mg/liter of gasoline loaded.
- (b) The vented vapor and gases are displaced only to the vapor control system.
- (c) Liquid drainage from the loading device is prevented when it is not in use or complete drainage is accomplished before the loading device is disconnected.
- (d) All loading and vapor lines are equipped with fittings which make vapor-tight connections and which will be closed upon disconnection.

If employees of the owner of the source are not present during loading, it shall be the responsibility of the owner of the transport to make certain the vapor control system is attached to the transport. The owner of the source shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with this rule.

326 IAC 8-4-5 (Bulk Gasoline Plants)

The source is not subject to the requirements of 326 IAC 8-4-5 (Bulk Gasoline Plants), because the source is not a bulk gasoline plant.

326 IAC 8-4-6 (Gasoline Dispensing Facilities)

The source is not subject to the requirements of 326 IAC 8-4-6 (Gasoline Dispensing Facilities), because the source does not dispense gasoline into motor vehicle fuel tanks or portable container and is not a gasoline dispensing facility.

326 IAC 8-4-7 (Gasoline Transports)

The source is not subject to the requirements of 326 IAC 8-4-7 (Gasoline Transports), because it is not an owner or operator of a gasoline transport.

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

The source is subject to the requirements of 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems, Records), because the source is subject to the requirements of 326 IAC 8-4-4 and 326 IAC 8-4-7. Pursuant to the rule, the source shall:

- (a) Ensure the following requirements are met, before allowing a gasoline transport subject to this rule to be filled or emptied :
 - (1) The gasoline transport is tested annually according to test procedures consistent with Appendix A of "Control of Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems", EPA-450/2-78-051, or equivalent procedure approved by the commissioner.
 - (2) The gasoline transport sustains a pressure change of no more than seven hundred fifty (750) pascals in five (5) minutes when pressurized to a gauge pressure of four thousand five hundred (4,500) pascals or evacuated to a gauge pressure of one thousand five hundred (1,500) pascals during the testing required in (a) (1).
 - (3) The equipment is repaired by the owner or operator and retested within fifteen (15) days of testing if it does not meet the criteria of (a) (2).
 - (4) The gasoline transport displays a sticker which shows the date that the gasoline tank truck last passed the test required in (a) (1) through (a) (2). Such sticker shall be displayed near the Department of Transportation Certification Plate required by 49 CFR 178.340-10b.
- (b) The owner of the transport shall be responsible for compliance with subsection (a). The owner of the loading facility shall take all reasonable steps to ensure that transports loading at its facility comply with subsection (b), and shall, in all cases when its employees are present to supervise or perform loading, be responsible for compliance with (a)(4).
- (c) The owner or operator of a vapor balance system or vapor control system subject to this rule shall:
 - (1) Design and operate the applicable system and the gasoline loading equipment in a manner that prevents:
 - (A) gauge pressure from exceeding four thousand five hundred (4,500) pascals and a vacuum from exceeding one thousand five hundred (1,500) pascals in the tank gasoline truck;

- (B) a reading equal to or greater than one hundred percent (100%) of the lower explosive limit (LEL, measured as propane) at two and five-tenths (2.5) centimeters from all points on the perimeter of a potential leak source when measured by the method referenced in Appendix B of "Control of Organic Compound leaks from Gasoline Tank Trucks and Vapor Collection Systems", EPA 450/2-78-051, or an equivalent procedure approved by the commissioner during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and
 - (C) avoidable visible liquid leaks during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals.
- (2) Repair and retest a vapor collection or control system that exceeds the limits in (c) (1) within fifteen (15) days.
- (d) The OAM staff may, at any time monitor a gasoline tank truck, vapor balance referenced to confirm continuing compliance with subsection (a) or (b).
 - (e) The owner or operator of a source subject to this section shall maintain records of all certification testing and repairs. The records must identify the following:
 - (1) The gasoline tank truck, vapor collection system, or vapor control system.
 - (2) The date of the test or repair.
 - (3) If applicable, the type of repair and the date of retest.
- The records must be maintained in a legible, readily available condition for at least two (2) years after the date the testing or repair was completed.
- (f) If the commissioner allows alternative test procedures in subsection (a)(1) or (c)(1)(B), such method shall be submitted to the U.S. EPA as a SIP revision.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The source is not subject to the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties), because the total potential to emit VOC from facilities covered under 326 IAC 8-7 is less than 25 tons per year.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

The source is not subject to the requirements of 326 IAC 9-1 (Carbon Monoxide Emission Limits), because the VCU is not one of the facility categories listed in 326 IAC 9-1-2.

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 operation of the bulk liquid fuel storage and transfer terminal has applicable compliance monitoring conditions as specified below:

- (a) Limit amount of material handled by loading rack to the following:
 - (1) 320 million gallons of gasoline per year;
 - (2) 320 million gallons of distillate fuel per year; and
 - (3) 9.142 million gallons of ethanol per year.

- (b) Operate the vapor combustion system, which has a capture efficiency of 98.7% and will emit no more than 35 mg VOC per liter of gasoline loaded, at all times when gasoline is being loaded. The Permittee shall conduct performance tests to assure meeting the stated capture efficiency requirement and the VOC emission limit.

- (c) Limit amount of material handled by all storage tanks to the following:
 - (1) 2,007 million gallons of gasoline per year, with Tanks T-801 -T-810 (excluding T-807) handling more than 50% of throughput;
 - (2) 789 million gallons of distillate fuel and all other non-gasoline materials per year.

- (d) Limit gasoline tank cleaning to 432 hours per year.

- (e) Limit amount of wastewater handled and treated to 31.1 millions gallons per year.

- (f) Quarterly reports shall be submitted to the OAM, Compliance Section. These reports shall include the gallons of throughput for gasoline, distillates, ethanol, gasoline additive and wastewater per month, as well as number of hours for gasoline tank cleaning, .

- (g) The source shall maintain records of the types of volatile petroleum liquid stored in the petroleum storage tanks, the maximum true vapor pressure of the liquid as stored, and the results of the inspections performed on the storage vessels. Such records shall be maintained for a period of two (2) years and shall be made available to the commissioner upon written request.

- (h) Maintain records of all certification testings and repairs for gasoline tank truck, vapor collection system, and vapor control system. The records must identify the following:
 - (1) The gasoline tank truck, vapor collection system, or vapor control system.
 - (2) The date of the test or repair.
 - (3) If applicable, the type of repair and the date of retest.

The records must be maintained in a legible, readily available condition for at least two (2) years after the date the testing or repair was completed.

These monitoring conditions are necessary to limit single HAP emissions to less than 10 tons per year and total HAPs emissions to less than 25 tons per year. Therefore, the requirements of 40 CFR Part 63.420, Subpart R do not apply. These conditions also assure the compliance of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities), 326 IAC 8-4-4 (Bulk Gasoline Terminals) and 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems; Records).

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 will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to the Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations. (see pages 6 and 7 of Appendix A)

Conclusion

The operation of this bulk liquid fuel storage and transfer terminal shall be subject to the conditions of the attached proposed **Part 70 Permit No. T089-7520-00326**.

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

Addendum to the
Technical Support Document for Part 70 Operating Permit

Source Name: Phillips Pipe Line Company
Source Location: 400 East Columbus Drive, East Chicago, IN 46132
County: Lake
SIC Code: 5171
Operation Permit No.: T089-7520-00326
Permit Reviewer: Scott Pan / EVP

On May 6, 1998, the Office of Air Management (OAM) had a notice published in the Gary Post Tribune in Gary, Indiana and the Hammond Times in Munster, Indiana, stating that Phillips Pipe Line Company had applied for a Part 70 Operating Permit to operate a bulk liquid fuel storage and transfer terminal. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating 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 Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit:

1. Items (x) and (y) in Section A.2 (page 5 of 45) and equipment list of Section D.2 (page 34 of 45) have been revised, to indicate the maximum capacity of the loading rack (RACK) and VOC fractionator (FRACT), as follows:
 - (x) VOC emissions from liquid fuel loading rack, identified as RACK, **with a maximum capacity of loading 324,000 gallons of liquid fuel per hour, and** controlled by a vapor recovery unit, identified as VCU;
 - (y) One (1) VOC fractionator for separating gasoline and fuel oil of transmix tanks, identified as FRACT, **with a capacity of processing 125 cubic feet of VOC vapor per minute, which vents 125 cubic feet of VOC vapor per minute during intermittent pressure relief with venting gas being controlled by VCU, and** equipped with a 7.0 million British thermal units per hour natural gas fired reboiler, ~~with venting gas being controlled by VCU;~~
2. Condition A.5 (page 7 of 45) has been removed.
3. Condition B.14 (page 12 of 45) has been revised as follows:

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

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

~~(a)-(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 ~~either of the following that:~~

- (1) The applicable requirements are included and specifically identified in this permit, **or**;
 - (2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~ **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, 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.
- ~~(b)~~ (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.
- ~~(d)~~ (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.
- ~~(e)~~ (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).
- ~~(f)~~ (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- ~~(g)~~ (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

4. Condition B.30 (Credible Evidence) was added to the proposed permit:

B.30 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.

5. Condition D.2.3 (page 35 of 45) has been revised, to include the conditions required for operating the fractionator, FRACT, as follows:

D.2.3 Hazardous Air Pollutants (HAPs) [40 CFR Part 63.420]

The Permittee shall:

- (a) Limit amount of material handled by loading rack to the following:

- (1) 320 million gallons of gasoline;
- (2) 320 million gallons of distillate fuel; and
- (3) 9.142 million gallons of ethanol;

per twelve (12) month period, rolled on a monthly basis.

- (b) Limit the venting of VOC from the fractionator, FRACT, to 2,760 minutes per twelve (12) month period, rolled on a monthly basis.**

- ~~(b)~~(c) Operate the vapor combustion system, which has a capture efficiency of 98.7% and will emit no more than 35 mg VOC per liter of gasoline loaded, at all times when gasoline is being loaded at the loading rack **or when VOC is venting from the fractionator.**

These requirements, in conjunction with the limit established in Conditions D.1.2 and D.3.1 shall limit the source wide total of the worst case single HAP to 7.0 tons, and total HAPs to 24 tons, per twelve (12) month period, rolled on a monthly basis. Therefore, the requirements of 40 CFR Part 63.420, Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

6. Condition D.2.8 (b) (page 37 of 45) has been revised, to include the record keeping requirements for operating the fractionator, as follows:

- (b) To document compliance with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through ~~(2)~~(3) below. Records maintained for (1) through ~~(2)~~(3) shall be taken monthly and shall be complete and sufficient to establish compliance with the liquid fuel throughput limits established in Condition D.2.3.

- (1) The amount and type of liquid fuel transferred through loading rack; ~~and~~

- (2) The time, date and total length in minutes of VOC venting from the fractionator; and**

- ~~(2)~~(3) A log of the dates of liquid transfers and tank cleaning.

7. The Quarterly Reporting Form for the loading rack (RACK) (page 43 of 45) has been revised, to include the requirement for reporting the total period length of fractionator venting, as follows:

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

Part 70 Quarterly Report

Source Name: Phillips Pipe Line Company
 Source Address: 400 East Columbus Drive, East Chicago, Indiana 46312
 Mailing Address: 362 Adams Building, Bartlesville, Oklahoma 74004
 Part 70 Permit No.: T089-7520-00326
 Facility: Loading Rack (RACK) and Fractionator (FRACT)
 Parameter: Gallons of Liquid Fuel Handled
 Limit: (1) 320 million gallons of gasoline per twelve (12) month period, rolled on a monthly basis;
 (2) 320 million gallons of distillate fuel per twelve (12) month period, rolled on a monthly basis; ~~and~~
 (3) 9.142 million gallons of ethanol per twelve (12) month period, rolled on a monthly basis; **and**
 (4) **Venting of VOC from fractionator, FRACT, for no more than 2,760 minutes per twelve (12) month period, rolled on a monthly basis.**

YEAR: _____

	Month	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
Gasoline Handled (1000 gallons)	Month 1			
	Month 2			
	Month 3			
Distillate Handled (1000 gallons)	Month 1			
	Month 2			
	Month 3			
Ethanol Handled (1000 gallons)	Month 1			
	Month 2			
	Month 3			
Fractionator VOC Venting (minutes)	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: _____

**Appendix A: Emission Calculations
Source Wide Total**

Company Name: Phillips Pipe Line Company
Address City IN Zip: 400 East Columbus Drive
East Chicago, Indiana 46312
CP #: T089-7520
Plt ID: 089-00326
Reviewer: Scott Pan/EVP
Date: April 24, 1998

Potential Emissions (tons/year)

Emissions Generating Activity

Pollutant	Storage Tank	Non-tank Processes	Combustion	Total
VOC	121.0	700.3	0.2	821.5
PM	0.0	0.0	0.4	0.4
PM10	0.0	0.0	0.4	0.4
NOx	0.0	0.0	85.4	85.4
SO2	0.0	0.0	0.0	0.0
CO	0.0	0.0	400.0	400.0
Single HAP	4.0	23.1	0.0	27.1
Total HAP	12.1	74.6	0.0	86.7

Limited Emissions (tons/year)

Emissions Generating Activity

Pollutant	Storage Tank	Non-tank Processes	Combustion	Total
VOC	121.0	81.6	0.2	202.8
PM	0.0	0.0	0.4	0.4
PM10	0.0	0.0	0.4	0.4
NOx	0.0	0.0	8.0	8.0
SO2	0.0	0.0	0.0	0.0
CO	0.0	0.0	24.5	24.5
Single HAP	4.0	2.7	0.0	6.7
Total HAP	12.1	11.8	0.0	24.0

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

Company Name: Phillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
CP: T089-7520
Plt ID: 089-00326
Reviewer: Scott Pan/EVP
Date: April 24, 1998

Tank Number	Product Stored	Losses (Tons per Year)							Total VOC Tons/yr
		Standing/ Total Breathing	Working	Withdraw	Rim Seal	Deck Fitting	Deck Seam	Roof Fitting	
T-1501	Gasoline Add.	0.01	0.07						0.08
T-1502	Gasoline Add.	0.01	0.07						0.08
T-202	Gasoline	18.23		0.80	1.76			16.48	19.03
T-204	Gasoline	2.44		0.77	1.33	1.11			3.21
T-207	Gasoline	0.06		(2)	11.91	0.05			0.06
T-209	Gasoline	1.24		(2)	0.12	1.11			1.24
T-401	Gasoline	1.53		(2)	0.17			1.36	1.53
T-201	Gasoline	10.29		(2)	1.63			8.65	10.29
T-801	Gasoline	10.64		0.65	1.93			8.71	11.29
T-802	Gasoline	15.87		(2)	2.93			12.94	15.87
T-803	Gasoline	10.64		(2)	1.93			8.71	10.64
T-804	Gasoline	17.19		(2)	1.93			15.27	17.19
T-805	Gasoline	10.66		(2)	1.93			8.74	10.66
T-806	Gasoline	10.66		(2)	1.93			8.74	10.66
T-808	Gasoline	0.63		(2)	0.25			0.38	0.63
T-809	Gasoline	0.63		(2)	0.25			0.38	0.63
T-810	Gasoline	0.63		(2)	0.25			0.38	0.63
T-103	Gasoline	0.01		(2)	0.00	0.01	0.00		0.01
T-208	Kerosene	0.05	(2)						0.05
T-2101	Kerosene	0.62	(2)						0.62
T-2102	Kerosene	0.60	(2)						0.60
T-240	Kerosene	0.06	(2)						0.06
T-2601	Kerosene	0.73	(2)						0.73
T-2602	Kerosene	0.73	4.33						5.06
T-205	Distillate	0.08	(2)						0.08
T-206	Distillate	0.08	(2)						0.08
T-807	Distillate	0.05	(2)						0.05
Total VOC		114.3	4.5	2.2	30.2	2.3	0.0	90.7	121.0

- Note: (1) All storage tank emissions estimated using EPA's TANKS 3.0 software program.
(2) Worst case VOC emissions due to withdraw loss were determined based on the following assumptions:
(a) All gasoline is transferred through T-202, T-204 or T-801 with a total limited annual throughput of 2,007 million gallons (47.8 million barrels), with Tanks T-801 - T-810 (except for T-807 which is not a gasoline tank) handling more than 50% of total throughput.
(b) All distillate/kerosene is transferred through T-2602 with a limited annual throughput of 788.8 million gallons (18.8 million barrels).

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

Company Name: Phillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
CP: T089-7520
Plt ID: 089-00326
Reviewer: Scott Pan/EVP
Date: April 24, 1998

Tank Number	Product Stored	Losses (Tons per Year)							Total VOC Tons/yr
		Standing/ Total Breathing	Working	Withdraw	Rim Seal	Deck Fitting	Deck Seam	Roof Fitting	
T-1501	Gasoline Add.	0.01	0.07						0.08
T-1502	Gasoline Add.	0.01	0.07						0.08
T-202	Gasoline	18.23		0.80	1.76			16.48	19.03
T-204	Gasoline	2.44		0.77	1.33	1.11			3.21
T-207	Gasoline	0.06		(2)	11.91	0.05			0.06
T-209	Gasoline	1.24		(2)	0.12	1.11			1.24
T-401	Gasoline	1.53		(2)	0.17			1.36	1.53
T-201	Gasoline	10.29		(2)	1.63			8.65	10.29
T-801	Gasoline	10.64		0.65	1.93			8.71	11.29
T-802	Gasoline	15.87		(2)	2.93			12.94	15.87
T-803	Gasoline	10.64		(2)	1.93			8.71	10.64
T-804	Gasoline	17.19		(2)	1.93			15.27	17.19
T-805	Gasoline	10.66		(2)	1.93			8.74	10.66
T-806	Gasoline	10.66		(2)	1.93			8.74	10.66
T-808	Gasoline	0.63		(2)	0.25			0.38	0.63
T-809	Gasoline	0.63		(2)	0.25			0.38	0.63
T-810	Gasoline	0.63		(2)	0.25			0.38	0.63
T-103	Gasoline	0.01		(2)	0.00	0.01	0.00		0.01
T-208	Distillate/Kerosene	0.05	(2)						0.05
T-2101	Distillate/Kerosene	0.62	(2)						0.62
T-2102	Distillate/Kerosene	0.60	(2)						0.60
T-240	Distillate/Kerosene	0.06	(2)						0.06
T-2601	Distillate/Kerosene	0.73	(2)						0.73
T-2602	Distillate/Kerosene	0.73	4.33						5.06
T-205	Distillate/Kerosene	0.08	(2)						0.08
T-206	Distillate/Kerosene	0.08	(2)						0.08
T-807	Distillate/Kerosene	0.05	(2)						0.05
Total VOC		114.3	4.5	2.2	30.2	2.3	0.0	90.7	121.0

Note: (1) All storage tank emissions estimated using EPA's TANKS 3.0 software program.

(2) Worst case VOC emissions due to withdraw loss were determined based on the following assumptions:

- (a) All gasoline is transferred through T-202, T-204 or T-801 with a total limited annual throughput of 2,007 million gallons (47.8 million barrels), with Tanks T-801 - T-810 (except for T-807 which is not a gasoline tank) handling more than 50% of total throughput.
- (b) All distillate/kerosene is transferred through T-2602 with a limited annual throughput of 788.8 million gallons (18.8 million barrels).

**Appendix A: Emission Calculations
Potential Non-Tank Emissions**

Company Name: Phillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
CP: T089-7520
Pit ID: 089-00326
Reviewer: Scott Pan/EVP
Date: April 24, 1998

Facility ID	Facility Description	VOC (1) (ton/yr)	HAP Emissions (ton/yr)											Total
			Benzene	Toluene	Ethylbenzene	Xylenes	Cumene	Hexane	Isooctane	MTBE	Naphthalene	Phenol	Methanol	
FUG LIQ	Equip. Leaks (Liquid)	5.24	1.52E-01	1.05E+00	1.94E-01	1.23E+00	5.14E-02	1.66E-01	6.32E-01	1.84E-01	0.00E+00	5.24E-05	0.00E+00	3.66
FUG VAP	Equip. Leaks (Vapor)	0.04	3.15E-04	5.99E-04	3.50E-05	1.75E-04	4.20E-06	5.61E-04	6.62E-04	1.16E-03	0.00E+00	0.00E+00	0.00E+00	0.00
OWS1	Oil/Water Separator #1	3.94	3.55E-02	6.74E-02	3.94E-03	1.97E-02	4.73E-04	6.31E-02	7.45E-02	1.30E-01	0.00E+00	0.00E+00	0.00E+00	0.39
OWS2	Oil/Water Separator #2	0.88	7.88E-03	1.50E-02	8.76E-04	4.38E-03	1.05E-04	1.40E-02	1.66E-02	2.89E-02	0.00E+00	0.00E+00	0.00E+00	0.09
FLRACK	Loading Rack Fugitive (2)	175.23	1.58E+00	3.00E+00	1.75E-01	8.76E-01	2.10E-02	2.80E+00	3.31E+00	5.78E+00	0.00E+00	0.00E+00	0.00E+00	17.54
RACK	Loading Rack (3)	444.93	4.00E+00	7.61E+00	4.45E-01	2.22E+00	5.34E-02	7.12E+00	8.41E+00	1.47E+01	0.00E+00	0.00E+00	0.00E+00	44.55
STRIPPER	Air Stripper	1.47	3.68E-01	3.68E-01	3.68E-01	3.68E-01	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.47E-05	0.00E+00	1.47
TNKCLN1	Tank Cleaning (Gasoline)	64.72	5.82E-01	1.11E+00	6.47E-02	3.24E-01	7.77E-03	1.04E+00	1.22E+00	2.14E+00	0.00E+00	0.00E+00	0.00E+00	6.48
TNKCLN2	Tank Cleaning (Distillate)	0.11	9.90E-04	1.88E-03	1.10E-04	5.50E-04	1.32E-05	1.76E-03	2.08E-03	3.63E-03	0.00E+00	0.00E+00	0.00E+00	0.01
FILT1	Filter Changeout (Gasoline)	0.02	1.54E-04	2.92E-04	1.71E-05	8.54E-05	2.05E-06	2.73E-04	3.23E-04	5.63E-04	0.00E+00	0.00E+00	0.00E+00	0.00
FILT2	Filter Changeout (KTF)	0.00	4.46E-06	8.46E-06	4.95E-07	2.48E-06	5.94E-08	7.92E-06	9.36E-06	1.63E-05	0.00E+00	0.00E+00	0.00E+00	0.00
FILT3	Filter Changeout (Distillate)	0.00	1.80E-07	3.42E-07	2.00E-08	1.00E-07	2.40E-09	3.20E-07	3.78E-07	6.60E-07	0.00E+00	0.00E+00	0.00E+00	0.00
PROVE	Meter Proving	0.17	1.56E-03	2.97E-03	1.74E-04	8.69E-04	2.09E-05	2.78E-03	3.28E-03	5.73E-03	0.00E+00	0.00E+00	0.00E+00	0.02
PIG1	Pipeline Pigging	2.68	2.42E-02	4.59E-02	2.68E-03	1.34E-02	3.22E-04	4.30E-02	5.07E-02	8.86E-02	0.00E+00	0.00E+00	0.00E+00	0.27
SUMPS 1-5	Sumps for Tanks	0.75	6.75E-03	1.28E-02	7.50E-04	3.75E-03	9.00E-05	1.20E-02	1.42E-02	2.48E-02	0.00E+00	0.00E+00	0.00E+00	0.08
SUMP 6	Sump for Loading Dock	0.15	1.35E-03	2.57E-03	1.50E-04	7.50E-04	1.80E-05	2.40E-03	2.84E-03	4.95E-03	0.00E+00	0.00E+00	0.00E+00	0.02
Total		700.3	6.8	13.3	1.3	5.1	0.1	11.3	13.7	23.1	0.0	0.0	0.0	74.6

- Note:
- (1) The emissions listed are based on the emission calculations submitted by the applicant which were verified and found to be accurate and correct.
 - (2) Fugitive VOC emissions are emissions due to loading of materials that are not routed to vapor combustion unit (VCU) with 98.7% capturing.
 - (3) Emissions from loading of liquid fuels that are routed through VCU and the intermittent venting of the Fractionator during pressure relief. Allowable emission of 35 mg/L gasoline loaded is used for calculating emissions from gasoline loading.
 - (4) VOC emissions from tank cleaning are based on each of the 27 tanks (16 gasoline and 11 distillate tanks) being cleaned once per year.

**Appendix A: Emission Calculations
Limited Non-Tank Emissions**

Company Name: Phillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
CP: T089-7520
Pit ID: 089-00326
Reviewer: Scott Pan/EVP
Date: April 24, 1998

Facility ID	Facility Description	VOC (ton/yr)	HAP Emissions (ton/yr)											Total
			Benzene	Toluene	Ethylbenzene	Xylenes	Cumene	Hexane	Isooctane	MTBE	Naphthalene	Phenol	Methanol	
FUG LIQ	Equip. Leaks (Liquid)	5.24	1.52E-01	1.05E+00	1.94E-01	1.23E+00	5.14E-02	1.66E-01	6.32E-01	1.83E-01	0.00E+00	5.24E-05	0.00E+00	3.66
FUG VAP	Equip. Leaks (Vapor)	0.04	3.18E-04	6.04E-04	3.53E-05	1.77E-04	4.24E-06	5.65E-04	6.67E-04	1.16E-03	0.00E+00	0.00E+00	0.00E+00	0.00
OWS1	Oil/Water Separator #1	0.15	1.35E-03	2.57E-03	1.50E-04	7.50E-04	1.80E-05	2.40E-03	2.84E-03	4.95E-03	0.00E+00	0.00E+00	0.00E+00	0.02
OWS2	Oil/Water Separator #2	0.15	1.35E-03	2.57E-03	1.50E-04	7.50E-04	1.80E-05	2.40E-03	2.84E-03	4.95E-03	0.00E+00	0.00E+00	0.00E+00	0.02
FLRACK	Loading Rack Fugitive (2)	14.29	1.29E-01	2.44E-01	1.43E-02	7.14E-02	1.71E-03	2.29E-01	2.70E-01	4.72E-01	0.00E+00	0.00E+00	0.00E+00	1.43
RACK	Loading Rack (3) (4)	49.86	4.49E-01	8.53E-01	4.99E-02	2.49E-01	5.98E-03	7.98E-01	9.42E-01	1.65E+00	0.00E+00	0.00E+00	0.00E+00	4.99
STRIPPER	Air Stripper	0.58	1.45E-01	1.45E-01	1.45E-01	1.45E-01	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.81E-06	0.00E+00	0.58
TNKCLN1	Tank Cleaning (Gasoline) (5)	10.15	9.13E-02	1.74E-01	1.01E-02	5.07E-02	1.22E-03	1.62E-01	1.92E-01	3.35E-01	0.00E+00	0.00E+00	0.00E+00	1.02
TNKCLN2	Tank Cleaning (Distillate)	0.11	9.90E-04	1.88E-03	1.10E-04	5.50E-04	1.32E-05	1.76E-03	2.08E-03	3.63E-03	0.00E+00	0.00E+00	0.00E+00	0.01
FILT1	Filter	0.01	9.18E-05	1.74E-04	1.02E-05	5.10E-05	1.22E-06	1.63E-04	1.93E-04	3.37E-04	0.00E+00	0.00E+00	0.00E+00	0.00
FILT2	Filter	0.00	2.70E-06	5.13E-06	3.00E-07	1.50E-06	3.60E-08	4.80E-06	5.67E-06	9.90E-06	0.00E+00	0.00E+00	0.00E+00	0.00
FILT3	Filter	0.00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00
PROVE	Meter Proving	0.13	1.14E-03	2.18E-03	1.27E-04	6.36E-04	1.53E-05	2.04E-03	2.40E-03	4.20E-03	0.00E+00	0.00E+00	0.00E+00	0.01
PIG1	Pipeline Pigging	0.00	2.79E-05	5.30E-05	3.10E-06	1.55E-05	3.72E-07	4.96E-05	5.86E-05	1.02E-04	0.00E+00	0.00E+00	0.00E+00	0.00
SUMPS 1-5	Sumps for Tanks	0.75	6.75E-03	1.28E-02	7.50E-04	3.75E-03	9.00E-05	1.20E-02	1.42E-02	2.48E-02	0.00E+00	0.00E+00	0.00E+00	0.08
SUMP 6	Sump for Loading Duck	0.15	1.35E-03	2.57E-03	1.50E-04	7.50E-04	1.80E-05	2.40E-03	2.84E-03	4.95E-03	0.00E+00	0.00E+00	0.00E+00	0.02
Total		81.6	1.0	2.5	0.4	1.7	0.1	1.4	2.1	2.7	0.0	0.0	0.0	11.8

- Note:
- (1) The emissions listed are based on the emission calculations submitted by the applicant which were verified and found to be accurate and correct.
 - (2) Fugitive VOC emissions are emissions due to loading of materials that are not routed to vapor combustion unit (VCU) with 98.7% capturing.
 - (3) Loading Rack emissions include emissions from loading of liquid fuels that are routed through VCU and the intermittent venting of the Fractionator during pressure relief. Controlled VOC emissions of 35 mg/L gasoline loaded is used for calculating emissions from gasoline loading.
 - (4) Calculations for loading rack are based on the limited fuel throughputs of 320 mmGal/yr for each of gasoline and distillate and 9.142 mmGal/yr of ethanol.
 - (5) Gasoline tank cleaning is limited to 3 tank cleanings per year.

**Appendix A: Emission Calculations
HAP Potential Emissions Summary**

Company Name: **Phillips Pipe Line Company**
Address: **400 East Columbus Drive, East Chicago, Indiana 46312**
CP: **T089-7520**
Plt ID: **089-00326**
Reviewer: **Scott Pan/EVP**
Date: **April 24, 1998**

Source	Service	VOC Emissions	Vapor Weight Percent										Total	
			Benzene	Toluene	Ethylbenzene	Xylenes	Cumene	Hexane	Isooctane	MTBE	Naphthalene	Phenol		Methanol
	Gasoline/Distillate		0.90%	1.71%	0.10%	0.50%	0.01%	1.60%	1.89%	3.30%	0.00%	0.00%	0.00%	
	Additive		0.47%	2.98%	0.54%	1.28%	0.06%	0.00%	0.00%	0.00%	0.01%	0.00%	10.38%	
	Process Liquid		2.90%	20.10%	3.70%	23.37%	0.98%	3.16%	12.05%	3.50%	0.00%	0.00%	0.00%	
	Stripper Exh.		25.00%	25.00%	25.00%	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
			HAP Emissions (tons/yr)											
T-1501	Gasoline Add.	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01
T-1502	Gasoline Add.	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01
T-202	Gasoline	19.03	0.17	0.33	0.02	0.10	0.00	0.30	0.36	0.63	0.00	0.00	0.00	1.91
T-204	Gasoline	3.21	0.03	0.05	0.00	0.02	0.00	0.05	0.06	0.11	0.00	0.00	0.00	0.32
T-207	Gasoline	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
T-209	Gasoline	1.24	0.01	0.02	0.00	0.01	0.00	0.02	0.02	0.04	0.00	0.00	0.00	0.12
T-401	Gasoline	1.53	0.01	0.03	0.00	0.01	0.00	0.02	0.03	0.05	0.00	0.00	0.00	0.15
T-201	Gasoline	10.29	0.09	0.18	0.01	0.05	0.00	0.16	0.19	0.34	0.00	0.00	0.00	1.03
T-801	Gasoline	11.29	0.10	0.19	0.01	0.06	0.00	0.18	0.21	0.37	0.00	0.00	0.00	1.13
T-802	Gasoline	15.87	0.14	0.27	0.02	0.08	0.00	0.25	0.30	0.52	0.00	0.00	0.00	1.59
T-803	Gasoline	10.64	0.10	0.18	0.01	0.05	0.00	0.17	0.20	0.35	0.00	0.00	0.00	1.07
T-804	Gasoline	17.19	0.15	0.29	0.02	0.09	0.00	0.28	0.32	0.57	0.00	0.00	0.00	1.72
T-805	Gasoline	10.66	0.10	0.18	0.01	0.05	0.00	0.17	0.20	0.35	0.00	0.00	0.00	1.07
T-806	Gasoline	10.66	0.10	0.18	0.01	0.05	0.00	0.17	0.20	0.35	0.00	0.00	0.00	1.07
T-808	Gasoline	0.63	0.01	0.01	0.00	0.00	0.00	0.01	0.01	0.02	0.00	0.00	0.00	0.06
T-809	Gasoline	0.63	0.01	0.01	0.00	0.00	0.00	0.01	0.01	0.02	0.00	0.00	0.00	0.06
T-810	Gasoline	0.63	0.01	0.01	0.00	0.00	0.00	0.01	0.01	0.02	0.00	0.00	0.00	0.06
T-103	Gasoline	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
T-208	Distillate/Kerosene	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
T-2101	Distillate/Kerosene	0.62	0.01	0.01	0.00	0.00	0.00	0.01	0.01	0.02	0.00	0.00	0.00	0.06
T-2102	Distillate/Kerosene	0.60	0.01	0.01	0.00	0.00	0.00	0.01	0.01	0.02	0.00	0.00	0.00	0.06
T-240	Distillate/Kerosene	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
T-2601	Distillate/Kerosene	0.73	0.01	0.01	0.00	0.00	0.00	0.01	0.01	0.02	0.00	0.00	0.00	0.07
T-2602	Distillate/Kerosene	5.06	0.05	0.09	0.01	0.03	0.00	0.08	0.10	0.17	0.00	0.00	0.00	0.51
T-205	Distillate/Kerosene	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
T-206	Distillate/Kerosene	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
T-807	Distillate/Kerosene	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
FUG LIQ	Process Liquid	5.24	0.15	1.05	0.19	1.23	0.05	0.17	0.63	0.18	0.00	0.00	0.00	3.66
FUG VAP	Gasoline	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
OWS1	Gasoline	3.94	0.04	0.07	0.00	0.02	0.00	0.06	0.07	0.13	0.00	0.00	0.00	0.39
OWS2	Gasoline	0.88	0.01	0.01	0.00	0.00	0.00	0.01	0.02	0.03	0.00	0.00	0.00	0.09
FLRACK	Gasoline	175.23	1.58	3.00	0.18	0.88	0.02	2.80	3.31	5.78	0.00	0.00	0.00	17.54
RACK	Gasoline	444.93	4.00	7.61	0.44	2.22	0.05	7.12	8.41	14.68	0.00	0.00	0.00	44.55
STRIPPER	Stripper Exh.	1.47	0.37	0.37	0.37	0.37	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.47
TNKCLN1	Gasoline	64.72	0.58	1.11	0.06	0.32	0.01	1.04	1.22	2.14	0.00	0.00	0.00	6.48
TNKCLN2	Distillate	0.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
FILT1	Gasoline	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FILT2	Gasoline	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FILT3	Gasoline	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PROVE	Gasoline	0.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.02
PIG1	Gasoline	2.68	0.02	0.05	0.00	0.01	0.00	0.04	0.05	0.09	0.00	0.00	0.00	0.27
SUMPS 1-5	Gasoline	0.75	0.01	0.01	0.00	0.00	0.00	0.01	0.01	0.02	0.00	0.00	0.00	0.08
SUMP 6	Gasoline	0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
Total	tons/yr	821.4	7.9	15.4	1.4	5.7	0.1	13.2	16.0	27.1	0.0	0.0	0.0	86.7

Note: (1) All storage tank emissions are calculated using EPA's TANKS 3.0 software program.

(2) Potential HAP emissions (tons/yr) = Potential VOC emissions (tons/yr) * Vapor Weight % HAPs

**Appendix A: Emission Calculations
HAP Limited Emissions Summary**

**Company Name: Phillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
CP: T089-7520
Plt ID: 089-00326
Reviewer: Scott Pan/EVP
Date: April 24, 1998**

Source	Service	VOC Emissions	Vapor Weight Percent											Total
			Benzene	Toluene	Ethylbenzene	Xylenes	Cumene	Hexane	Isooctane	MTBE	Naphthalene	Phenol	Methanol	
	Gasoline/Distillate		0.90%	1.71%	0.10%	0.50%	0.01%	1.60%	1.89%	3.30%	0.00%	0.00%	0.00%	
	Additive		0.47%	2.98%	0.54%	1.28%	0.06%	0.00%	0.00%	0.00%	0.01%	0.00%	10.38%	
	Process Liquid		2.90%	20.10%	3.70%	23.37%	0.98%	3.16%	12.05%	3.50%	0.00%	0.00%	0.00%	
	Stripper Exh.		25.00%	25.00%	25.00%	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
HAP Emissions (tons/yr)														
T-1501	Gasoline Add.	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01
T-1502	Gasoline Add.	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01
T-202	Gasoline	19.03	0.17	0.33	0.02	0.10	0.00	0.30	0.36	0.63	0.00	0.00	0.00	1.91
T-204	Gasoline	3.21	0.03	0.05	0.00	0.02	0.00	0.05	0.06	0.11	0.00	0.00	0.00	0.32
T-207	Gasoline	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
T-209	Gasoline	1.24	0.01	0.02	0.00	0.01	0.00	0.02	0.02	0.04	0.00	0.00	0.00	0.12
T-401	Gasoline	1.53	0.01	0.03	0.00	0.01	0.00	0.02	0.03	0.05	0.00	0.00	0.00	0.15
T-201	Gasoline	10.29	0.09	0.18	0.01	0.05	0.00	0.16	0.19	0.34	0.00	0.00	0.00	1.03
T-801	Gasoline	11.29	0.10	0.19	0.01	0.06	0.00	0.18	0.21	0.37	0.00	0.00	0.00	1.13
T-802	Gasoline	15.87	0.14	0.27	0.02	0.08	0.00	0.25	0.30	0.52	0.00	0.00	0.00	1.59
T-803	Gasoline	10.64	0.10	0.18	0.01	0.05	0.00	0.17	0.20	0.35	0.00	0.00	0.00	1.07
T-804	Gasoline	17.19	0.15	0.29	0.02	0.09	0.00	0.28	0.32	0.57	0.00	0.00	0.00	1.72
T-805	Gasoline	10.66	0.10	0.18	0.01	0.05	0.00	0.17	0.20	0.35	0.00	0.00	0.00	1.07
T-806	Gasoline	10.66	0.10	0.18	0.01	0.05	0.00	0.17	0.20	0.35	0.00	0.00	0.00	1.07
T-808	Gasoline	0.63	0.01	0.01	0.00	0.00	0.00	0.01	0.01	0.02	0.00	0.00	0.00	0.06
T-809	Gasoline	0.63	0.01	0.01	0.00	0.00	0.00	0.01	0.01	0.02	0.00	0.00	0.00	0.06
T-810	Gasoline	0.63	0.01	0.01	0.00	0.00	0.00	0.01	0.01	0.02	0.00	0.00	0.00	0.06
T-103	Gasoline	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
T-208	Distillate/Kerosene	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
T-2101	Distillate/Kerosene	0.62	0.01	0.01	0.00	0.00	0.00	0.01	0.01	0.02	0.00	0.00	0.00	0.06
T-2102	Distillate/Kerosene	0.60	0.01	0.01	0.00	0.00	0.00	0.01	0.01	0.02	0.00	0.00	0.00	0.06
T-240	Distillate/Kerosene	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
T-2601	Distillate/Kerosene	0.73	0.01	0.01	0.00	0.00	0.00	0.01	0.01	0.02	0.00	0.00	0.00	0.07
T-2602	Distillate/Kerosene	5.06	0.05	0.09	0.01	0.03	0.00	0.08	0.10	0.17	0.00	0.00	0.00	0.51
T-205	Distillate/Kerosene	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
T-206	Distillate/Kerosene	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
T-807	Distillate/Kerosene	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
FUG LIQ	Process Liquid	5.24	0.15	1.05	0.19	1.23	0.05	0.17	0.63	0.18	0.00	0.00	0.00	3.66
FUG VAP	Gasoline	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
OWS1	Gasoline	0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
OWS2	Gasoline	0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
FLRACK	Gasoline	14.29	0.13	0.24	0.01	0.07	0.00	0.23	0.27	0.47	0.00	0.00	0.00	1.43
RACK	Gasoline	49.86	0.45	0.85	0.05	0.25	0.01	0.80	0.94	1.65	0.00	0.00	0.00	4.99
STRIPPER	Stripper Exh.	0.58	0.15	0.15	0.15	0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.58
TNKCLN1	Gasoline	10.15	0.09	0.17	0.01	0.05	0.00	0.16	0.19	0.33	0.00	0.00	0.00	1.02
TNKCLN2	Distillate	0.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
FILT1	Gasoline	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FILT2	Gasoline	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FILT3	Gasoline	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PROVE	Gasoline	0.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
PIG1	Gasoline	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SUMPS 1-5	Gasoline	0.75	0.01	0.01	0.00	0.00	0.00	0.01	0.01	0.02	0.00	0.00	0.00	0.08
SUMP 6	Gasoline	0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
Total	tons/yr	202.6	2.1	4.6	0.5	2.4	0.1	3.3	4.3	6.7	0.0	0.0	0.0	24.0

Note: (1) All storage tank emissions are calculated using EPA's TANKS 3.0 software program.

(2) Potential HAP emissions (tons/yr) = Potential VOC emissions (tons/yr) * Vapor Weight % HAPs

**Appendix A: Emission Calculations
Natural Gas Combustion**

Company Name: Phillips Pipe Line Company
Address City IN Zip: 400 East Columbus Drive, East Chicago, Indiana 46312
CP: T089-7520
Plt ID: 089-00326
Reviewer: Scott Pan/EVP
Date: March 25, 1998

I. Fuel Combustion

Heat Input Capacity Potential Throughput
7.0 MMBtu/hr 61.3 MMCF/yr

Heat Input Capacity includes:
 one - 7 mmBtu/hr reboiler for the Fractionator

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.9	11.9	0.6	100.0	5.8	21.0
Potential Emission in tons/yr	0.36	0.36	0.02	3.07	0.18	0.64

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx burner = 15, Flue Gas Recirculation = ND.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

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

II. VCU Emissions

Maximum Hourly Throughput Limited Throughput
612.0 1000 gal/hr 320.0 MMgal/yr

	Pollutant		
	NOx	CO	VOC
Emission Factor in lb/1000 gal throughput	0.0307	0.1490	35 (mg/1000 liter)
Potential Emission in tons/yr	82.29	399.40	0.78
Limited Emission in tons/yr	4.91	23.84	0.05

Methodology:

Emission factors were based on equipment manufacturer's information.

Potential Emission (ton/yr) =

$$\text{Max. Hourly Throughput (1000 gal/hr)} * \text{Emission Factor (lb/1000 gal throughput)} * 8760 \text{ (hr/yr)} / 2000 \text{ (lb/ton)}$$

Limited Emission (ton/yr) =

$$\text{Limited Annual Throughput (mmgal/yr)} * 1000 \text{ (1000/million)} * \text{Emission Factor (lb/1000 gal throughput)} / 2000 \text{ (lb/ton)}$$

Pursuant to 326 IAC 8-4-4, allowable VOC emissions are 80 mg/1000 liter loaded

$$\begin{aligned} \text{Allowable VOC emissions} &= 80 \text{ mg/1000 liter} * 612 \text{ (1000 gal/hr)} * 3.78 \text{ liter/gal} * (1/453,590) \text{ lb/mg} * (1/2000) \text{ (ton/lb)} * 8760 \text{ (hr/yr)} \\ &= 1.79 \text{ ton/yr} \end{aligned}$$