

**ENHANCED NEW SOURCE REVIEW (ENSR) and
FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR MANAGEMENT**

**TransMontaigne Terminaling, Inc.
(Formerly COZ Terminaling, Inc.)
20630 West Ireland Road
South Bend, Indiana 46614**

(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 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F141-9083-00139	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-8-3(b)]	5
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	5
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]	7
A.4	FESOP Permit Applicability [326 IAC 2-8-2]	7
A.5	Prior Permit Conditions Superseded [326 IAC 2]	7
SECTION B	GENERAL CONDITIONS	8
B.1	Permit No Defense [326 IAC 2-1-10] [IC 13]	8
B.2	Definitions [326 IAC 2-8-1]	8
B.3	Permit Term [326 IAC 2-8-4(2)]	8
B.4	Enforceability [326 IAC 2-8-6]	8
B.5	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]	8
B.6	Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]	8
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	8
B.8	Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]	8
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	9
B.10	Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]	9
B.11	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]	9
B.12	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	9
B.13	Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)] [326 IAC 1-6-3]	10
B.14	Emergency Provisions [326 IAC 2-8-12]	10
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	12
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination	13
B.17	Permit Renewal [326 IAC 2-8-3(h)]	13
B.18	Administrative Permit Amendment [326 IAC 2-8-10]	14
B.19	Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]	14
B.20	Significant Permit Modification [326 IAC 2-8-11(d)]	15
B.21	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)]	15
B.22	Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]	15
B.23	Operational Flexibility [326 IAC 2-8-15]	15
B.24	Construction Permit Requirement [326 IAC 2]	17
B.25	Inspection and Entry [326 IAC 2-8-5(a)(2)]	17
B.26	Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]	17
B.27	Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]	18
B.28	Enhanced New Source Review [326 IAC 2]	18
SECTION C	SOURCE OPERATION CONDITIONS	19
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Overall Source Limit [326 IAC 2-8]	19
C.2	Opacity [326 IAC 5-1]	19
C.3	Open Burning [326 IAC 4-1][IC 13-17-9]	19
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	20
C.5	Fugitive Dust Emissions [326 IAC 6-4]	20
C.6	Operation of Equipment [326 IAC 2-8-5(a)(4)]	20
C.7	Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]	20

Testing Requirements [326 IAC 2-8-4(3)]	
C.8	Performance Testing [326 IAC 3-6] 20
Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]	
C.9	Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)] 20
C.10	Monitoring Methods [326 IAC 3] 21
C.11	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140] 21
Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]	
C.12	Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215] 22
C.13	Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)] . . 22
C.14	Actions Related to Noncompliance Demonstrated by a Stack Test 24
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]	
C.15	Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)] 24
C.16	Monitoring Data Availability 24
C.17	General Record Keeping Requirements [326 IAC 2-8-4(3)(B)] 25
C.18	General Reporting Requirements [326 IAC 2-8-4(3)(C)] 26
Stratospheric Ozone Protection	
C.19	Compliance with 40 CFR 82 and 326 IAC 22-1 27
SECTION D.1 FACILITY OPERATION CONDITIONS	
Tanks, VDU, Loading Bay Area A-1 and A-2 28	
Emission Limitations and Standards [326 IAC 2-8-4(1)]	
D.1.1	Volatile Organic Compounds (VOC) [326 IAC 12 and 40 CFR 60.500 Subpart XX] . . 29
D.1.2	Volatile Organic Compounds (VOC) [326 IAC 8-4-4] 30
D.1.3	Volatile Organic Compounds (VOC) [326 IAC 8-4-9] 30
D.1.4	Volatile Organic Compounds (VOC) 31
D.1.5	Preventive Maintenance Plan [326 IAC 2-8-4(9)] 31
Compliance Determination Requirements	
D.1.6	Testing Requirements [326 IAC 2-8-5(1)] 31
Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]	
D.1.7	Monitoring 31
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]	
D.1.8	Record Keeping Requirements 32
SECTION D.2 FACILITY CONDITIONS	
Tanks, Loading Arms S₆ and N₆ 33	
General Construction Conditions 33	
Effective Date of the Permit 34	
First Time Operation Permit 34	

Emission Limitations and Standards [326 IAC 2-8-4(1)]	
D.2.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]	34
Compliance Determination Requirements	
D.2.6 Testing Requirements [326 IAC 2-8-5(1)]	34
Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]	
D.2.7 Monitoring of Operations [40 CFR 60.116b]	34
D.2.8 Monitoring	35
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]	
D.2.9 Record Keeping Requirements	35
Certification Form	36
Quarterly Report Form	37

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 2-8-3(b)]

The Permittee owns and operates a bulk gasoline terminal.

Responsible Official: Mr. Dudley Tarlton
Source Address: 20630 West Ireland Road, South Bend, Indiana 46614
Mailing Address: 280 North College, Suite 500, P. O. Box 1503, Fayetteville, AR 72702
SIC Code: 4226
County Location: St. Joseph
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD;

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

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

- (a) Tank 711 (constructed 1947) - A vertical above ground, internal floating roof tank used for storing gasoline or lower vapor pressure products. The height, diameter and capacity are 38 feet, 60 feet and 798,000 gallons, respectively.
- (b) Tank 702 (constructed 1947) - A vertical above ground, internal floating roof tank used for storing gasoline or lower vapor pressure products. The height, diameter and capacity are 35 feet, 60 feet and 729, 246 gallons, respectively.
- (c) Tank 722 (constructed 1951) - A vertical, internal floating roof tank used for storing gasoline or lower vapor pressure products. The height, diameter and capacity are 48 feet, 90 feet and 2, 299, 962 gallons, respectively.
- (d) Tank 732 (constructed 1951) - A vertical above ground, fixed roof cone tank used for storing distillate fuel oil. The height, diameter and capacity are 48 feet, 90 feet and 2,299,962 gallons, respectively.
- (e) Additive 1 (constructed 1996) - A horizontal above ground fixed roof tank identified as GA used for storing fuel additive. The length, diameter and capacity are 21 feet, 8 feet and 8,000 gallons, respectively.
- (f) Additive 2 (constructed 1996) - A horizontal above ground fixed roof tank identified as DA used for storing fuel additive. The length, diameter and capacity are 21 feet, 8 feet and 8,000 gallons, respectively.
- (g) Additive 3 (constructed 1996) - A horizontal above ground fixed roof tank identified as RD used for storing fuel additive. The length, diameter and capacity are 21 feet, 8 feet and 8,000 gallons, respectively.

- (h) One (1) loading bay area identified as A -1 consisting of a loading rack identified as north, consisting five (5) loading arms identified as arm- N₁ to N₅, each have a maximum capacity to deliver 600 gallons of fuel per minutes, loading arm N₁ and N₂ delivers fuel distillates, loading arm N₃, N₄ and N₅ carries gasoline fuels respectively. The VOC emissions from the loading arms identified as N₁ to N₅ are controlled by a one (1) vapor collection system and vented to one (1) thermal oxidizer with a heat input capacity of 54,486 Btu/hour;
- (i) One (1) loading bay area identified as A-2 consisting of a loading rack identified as south, consisting five (5) loading arms identified as arm- S₁ to S₅, each have a maximum capacity to deliver 600 gallons of fuel per minutes, loading arm S₁ and S₂ delivers fuel distillates, loading arm S₃, S₄ and S₅ carries gasoline fuels respectively. The VOC emissions from the loading arms identified as S₁ to S₅ are controlled by a one (1) vapor collection system and vented to one (1) thermal oxidizer with a heat input capacity of 54,486 Btu/hour.
- (j) Tank 701 (constructed 1947) - A vertical above ground, internal floating roof tank used for storing gasoline or lower vapor pressure products. The height, diameter and capacity are 40 feet, 60 feet and 840,000 gallons, respectively.
- (k) Tank 704 (constructed 1946) - A vertical above ground, internal floating roof tank used for storing gasoline or lower vapor pressure products. The height, diameter and capacity are 40 feet, 42.60 feet and 420,000 gallons, respectively.
- (l) Tank 712 (constructed 1946) - A vertical above ground, internal floating roof tank used for storing gasoline or lower vapor pressure products. The height, diameter and capacity are 40 feet, 42.60 feet and 420,000 gallons, respectively.
- (m) Tank 714 (constructed 1946) - A vertical above ground, internal floating roof tank used for storing gasoline or lower vapor pressure products. The height, diameter and capacity are 40 feet, 42.60 feet and 420,000 gallons, respectively.
- (n) One (1) vertical fixed roof, above ground storage tank identified as EA, used for storing ethyl alcohol. The height, diameter, capacity are 31 feet, 10.50 feet and 20,000 gallons respectively.
- (o) One (1) vertical fixed roof, above ground storage tank (constructed 1947) identified as 703, used for storing jet kerosene. The height, diameter, capacity are 40 feet, 42.50 feet and 420,000 gallons respectively.
- (p) One (1) loading arm identified as N₆ at loading rack identified as north on loading bay area identified as A-1, maximum capacity to deliver 600 gallons of ethanol per minutes, The VOC emissions from the loading arms identified as N₆ are controlled by a vapor collection system and vented to one (1) thermal oxidizer with a heat input capacity of 54,486 Btu/hour;
- (q) One (1) loading arm identified as S₆ at loading rack identified as south on loading bay area identified as A-2, maximum capacity to deliver 600 gallons of jet kerosene, The VOC emissions from the loading arms identified as S₆ are controlled by a vapor collection system and vented to one (1) thermal oxidizer with a heat input capacity of 54,486 Btu/hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

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

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

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

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

SECTION B GENERAL CONDITIONS

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

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 FESOP under 326 IAC 2-8.

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

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

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

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

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

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (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 2-8-9] [326 IAC 2-8-3(h)]

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

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

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 2-8-4(5)(D)]

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

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

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

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

- (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 Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(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.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually certify that the source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 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

- (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 the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, 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.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM , 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 No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

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

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

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any 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.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, 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 2-8-8(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(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, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(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 until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM 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 needed to process the application.

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

- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).

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

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

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

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

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, review by affected states and review by U.S. EPA, as they apply to permit issuance and renewal.

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

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

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

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

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

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

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

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

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

and

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

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

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

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

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

B.24 Construction Permit Requirement [326 IAC 2]

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

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

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

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

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

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10.
- (c) IDEM, OAM shall reserve the right to issue a new permit.

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

- (a) The Permittee shall pay annual fees to IDEM, OAM within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-8-16.
- (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.28 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 such facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a) (2) (A) and (B) are not federally enforceable.

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). Rule 326 IAC 6-4-2(4) is not federally enforceable.

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

All air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment is in operation, as described in Section D of this permit.

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

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 2-8-4(3)]

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

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

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

Compliance with applicable requirements shall be documented 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 Data Section, 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 inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.10 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.11 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall insure 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [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.13 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) 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.14 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 2-8-4(3)]

C.15 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

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

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) 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. 16 Monitoring Data Availability

- (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 in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM 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.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (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.19 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) Tank 711 (constructed 1947) - A vertical above ground, internal floating roof tank used for storing gasoline or lower vapor pressure products. The height, diameter and capacity are 38 feet, 60 feet and 798,000 gallons, respectively.
- (b) Tank 702 (constructed 1947) - A vertical above ground, internal floating roof tank used for storing gasoline or lower vapor pressure products. The height, diameter and capacity are 35 feet, 60 feet and 729,246 gallons, respectively.
- (c) Tank 722 (constructed 1947) - A vertical, internal floating roof tank used for storing gasoline or lower vapor pressure products. The height, diameter and capacity are 48 feet, 90 feet and 2,299,962 gallons, respectively.
- (d) Tank 732 (constructed 1951) - A vertical above ground, fixed roof cone tank used for storing . The height, diameter and capacity are 48 feet, 90 feet and 2, 299,962 gallons, respectively.
- (e) Additive 1 (constructed 1996) - A horizontal above ground fixed roof tank identified as GA used for storing fuel additive. The length, diameter and capacity are 21 feet, 8 feet and 8,000 gallons, respectively.
- (f) Additive 2 (constructed 1996) - A horizontal above ground fixed roof tank identified as DA used for storing fuel additive. The length, diameter and capacity are 21 feet, 8 feet and 8,000 gallons, respectively.
- (g) Additive 3 (constructed 1996) - A horizontal above ground fixed roof tank identified as RD used for storing fuel additive. The length, diameter and capacity are 21 feet, 8 feet and 8,000 gallons, respectively.
- (h) One (1) loading bay area identified as A -1 consisting of a loading rack identified as north, consisting five (5) loading arms identified as arm- N₁ to N₅, each have a maximum capacity to deliver 600 gallons of liquid fuel per minutes, loading arm N₁ and N₂ delivers fuel distillates, loading arm N₃, N₄ and N₅ carries gasoline fuels respectively. The VOC emissions from the loading arms identified as N₁ to N₅ are controlled by a one (1) vapor collection system and vented to one (1) thermal oxidizer with a heat input capacity of 54,486 Btu/hour;
- (i) One (1) loading bay area identified as A-2 consisting of a loading rack identified as south, consisting five (5) loading arms identified as arm- S₁ to S₅, each have a maximum capacity to deliver 600 gallons of liquid fuel per minutes, loading arm S₁ and S₂ delivers fuel distillates, loading arm S₃, S₄ and S₅ carries gasoline fuels respectively. The VOC emissions from the loading arms identified as S₁ to S₅ are controlled by a one (1) vapor collection system and vented to one (1) thermal oxidizer with a heat input capacity of 54,486 Btu/hour.

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 12 and 40 CFR 60.500 Subpart XX]

Pursuant to 326 IAC 12 and 40 CFR 60.500 Subpart XX (Standards of Performance for Bulk Gasoline Terminals), the owner or operator of each bulk gasoline terminal containing an affected facility shall comply with the requirements of the following:

- (a) Loading racks identified as north and south (items h and i) shall be equipped with a vapor collection system designed to collect the total organic compound vapors displaced from tank trucks during product loading.
- (b) The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank truck shall not exceed 35 milligrams of total organic compounds per liter of gasoline loaded.
- (c) Each vapor collection system shall be designed to prevent any total organic compounds vapor collected at one loading rack identified as north from passing to another loading rack identified as south.
- (d) Loading of liquid product into gasoline tank trucks shall be limited to vapor tight gasoline tank trucks using the following procedures:
 - (1) The owner or operator shall obtain the vapor tightness documentation described in 40 CFR 60.505 (b) for each gasoline tank truck which is to be loaded at the affected facility.
 - (2) The owner or operator shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the facilities identified as A-1 and A-2.
 - (3) The owner or operator shall cross check tank identification number obtained in paragraph (d) (2) of this section with the file of tank tightness documentation within 2 weeks after the corresponding tank is loaded.
 - (4) The terminal owner or operator shall notify the owner or operator of each nonvapor-tight gasoline tank truck loaded at the facilities identified as A-1 and A-2 within 3 weeks after the loading has occurred.
 - (5) The terminal owner or operator shall take steps assuring that the non-vapor-tight gasoline tank truck will not be reloaded at the facilities identified as A-1 and A-2 until vapor tightness documentation for that tank is obtained.
- (e) The owner or operator shall act to assure that loading of gasoline tank trucks at the facilities identified as A-1 and A-2, are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.
- (f) The owner or operator shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the facilities identified as A-1 and A-2.
- (g) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during the product loading.
- (h) No pressure-vacuum vent in the bulk gasoline terminal's vapor collection shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).

- (i) Each calendar month, the vapor collection system, the vapor processing system, and loading rack identified as north and south handling gasoline shall be inspected during the loading of gasoline tank truck for total organic compounds liquid or vapor leaks.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-4]

Pursuant to 326 IAC 8-4-4 (Petroleum sources: bulk gasoline terminals),

- (a) No owner or operator of a bulk gasoline terminal shall permit the loading of gasoline into any transport, excluding railroad tank cars, or barges, unless
 - (1) the bulk gasoline terminal is equipped with a vapor control system, in good working order, in operation and consisting of a vapor collection system which directs all vapors to a fuel gas system or incinerator.
 - (2) Displaced vapors and gases are vented only to the vapor control system.
 - (3) A means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected and,
 - (4) All loading and vapor lines are equipped with fittings which make vapor tight connections and which will be closed upon disconnection.
- (b) If employees of the owner of the bulk gasoline terminal are not present during loading, it shall be the responsibility of the owner of the transport to make certain vapor control system is attached to the transport. The owner of the terminal shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with 326 IAC 8-4-4.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-4-9]

Pursuant to 326 IAC 8-4-9 (Petroleum sources: leaks from transports and vapor collection systems),

- (a) The owner or operator of a vapor balance system or vapor control system shall
 - (1) design and operate the applicable system and the gasoline loading equipment in a manner that prevents:
 - (i) gauge pressure from exceeding four thousand five hundred (4,500) pascals (eighteen (18) inches of H₂O) and a vacuum from exceeding one thousand five hundred (1,500) pascals (six (6) inches) in the gasoline tank truck;
 - (ii) 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 Compounds Leaks from Gasoline Tank Trucks and Vapor Collections Systems", EPA-450/2-78-051, or an equivalent procedure approved by the commissioner during loading or unloading operations at gasoline bulk terminals; and

- (iii) avoidable visible liquid leaks during loading or unloading operations at gasoline bulk terminals; and
- (2) within fifteen (15) days, repair and retest a vapor collection or control system that exceeds the limits in subdivision (1).

D.1.4 Volatile Organic Compounds (VOC)

The petroleum products from the tanks and loading racks shall be limited to 420,059,520 gallons per year, rolled on a monthly basis. This production limitation is equivalent to volatile organic compounds (VOC) emissions of 99 tons per year, rolled on a monthly basis. Therefore, 326 IAC 2-7 (Part 70 Program) will not apply.

During the first 12 months of operation, the petroleum products usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed 35,004, 960 gallons per month from tanks and loading racks.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the two (2) loading bay area identified as A₁ and A₂ consisting of a loading racks identified as north and south, consisting ten (10) loading arms identified as N₁ to N₅, S₁ to S₅ and the one (1) thermal oxidizer.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-8-5(1)]

- (a) During the period between 48 and 54 months after issuance of this permit, the Permittee shall perform the total organic compounds (TOC) test from thermal oxidizer utilizing methods as approved by the Commissioner.
- (b) The tests shall be performed according to 326 IAC 3-2.1 (Source sampling Procedures).
- (c) This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

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

D.1.7 Monitoring [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- (a) The thermal oxidizer and vapor collection system shall operate at all times when the any of the loading racks are operated. When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1400^o F to maintain a minimum 35 milligram per liter of total organic compounds (TOC) captured.
- (b) 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 result of the inspection performed on the storage vessels.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16] [40 CFR 60.505]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1. 2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (3) below.
- (1) The tank truck tightness document documentation shall be kept at the terminal in a permanent form available for inspection.
 - (2) The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test result as determined by Method 27. This document shall include, as a minimum, the following information:
 - (i) Test Title: Gasoline Delivery Tank Pressure Test - EPA Reference Method 27.
 - (ii) Tank Owner and Address.
 - (iii) Tank identification number
 - (iv) Testing location
 - (v) Date of test
 - (vi) Tester name and signature
 - (vii) witnessing inspector, if any: name, signature, and affiliation
 - (viii) Test results: Actual pressure change in 5 minutes
 - (3) A records of each monthly leak inspection shall be kept on file at the terminal for at least 2 years. Inspections records shall include, as a minimum, the following information:
 - (i) Date of inspection
 - (ii) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak)
 - (iii) Leak determination method
 - (iv) Corrective action (date each leak repaired; reasons for any interval in excess of 15 days).
 - (v) Inspector name and signature
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY CONDITIONS

- (j) Tank 701 (constructed 1947) - A vertical above ground, internal floating roof tank used for storing gasoline or lower vapor pressure products. The height, diameter and capacity are 40 feet, 60 feet and 840,000 gallons, respectively.
- (k) Tank 704 (constructed 1946) - A vertical above ground, internal floating roof tank used for storing gasoline or lower vapor pressure products. The height, diameter and capacity are 40 feet, 42.60 feet and 420,000 gallons, respectively.
- (l) Tank 712 (constructed 1946) - A vertical above ground, internal floating roof tank used for storing gasoline or lower vapor pressure products. The height, diameter and capacity are 40 feet, 42.60 feet and 420,000 gallons, respectively.
- (m) Tank 714 (constructed 1946) - A vertical above ground, internal floating roof tank used for storing gasoline or lower vapor pressure products. The height, diameter and capacity are 40 feet, 42.60 feet and 420,000 gallons, respectively.
- (n) One (1) vertical fixed roof, above ground storage tank identified as EA, used for storing ethyl alcohol. The height, diameter, capacity are 31 feet, 10.50 feet and 20,000 gallons respectively.
- (o) One (1) vertical fixed roof, above ground storage tank (constructed 1947) identified as 703, used for storing jet kerosene. The height, diameter, capacity are 40 feet, 42.50 feet and 420,000 gallons respectively.
- (p) One (1) loading arm identified as N₆ at loading rack identified as north on loading bay area identified as A-1, maximum capacity to deliver 600 gallons of ethanol per minutes, The VOC emissions from the loading arms identified as N₆ are controlled by a one (1) vapor collection system and vented to one (1) thermal oxidizer with a heat input capacity of 54,486 Btu/hour;
- (q) One (1) loading arm identified as S₆ at loading rack identified as south on loading bay area identified as A-2, maximum capacity to deliver 600 gallons of jet kerosene per minutes, The VOC emissions from the loading arms identified as S₆ are controlled by a one (1) vapor collection system and vented to one (1) thermal oxidizer with a heat input capacity of 54,486 Btu/hour.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.2]

General Construction Conditions

- D.2.1 The following construction conditions are not applicable to items j, k, l, m and o because these storage tanks were constructed prior to year 1968.
- D.2.2 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

- D.2.3 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

First Time Operation Permit

- D.2.4 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to:

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

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

- (b) The Permittee shall receive an Operation Validation Letter from the chief of the Permit Administration & Development Section and Attach it to this permit.

Operation Conditions

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

- D.2.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the two (2) loading racks identified as north and south, consisting two (2) loading arms identified as N₆, S₆ and the one (1) thermal oxidizer.

Compliance Determination Requirements

- D.2.6 Testing Requirements [326 IAC 2-8-5(1)]

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

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)][40 CFR 60.116b]

D.2.7 Monitoring of Operations [40 CFR 60.116b]

The owner or operator of vertical fixed roof storage tank identified as EA shall keep readily accessible records showing the dimension of the tank and analysis showing the capacity of the storage tank.

D.2.8 Monitoring [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- (a) The thermal oxidizer and vapor collection system shall operate at all times when the any of the loading racks are operated. When operating, the thermal oxidizer shall maintain a minimum operating temperature, fan amperage and duct velocity as determined in the compliance test to maintain a minimum 35 milligram per liter of total organic compounds (TOC) captured.

- (b) 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 result of the inspection performed on the storage vessels.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16][40 CFR 60.116b]

D.2.9 Record Keeping Requirements

The owner or operator of vertical fixed roof storage tank identified as EA shall keep readily accessible records showing the dimension of the tank and analysis showing the capacity of the tank for the life of the source.

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

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

Source Name: TransMontaigne Terminals, Inc. (Formerly COZ Terminals, Inc.)
Source Address: 20630 West Ireland Road, South Bend, Indiana 46614
Mailing Address: 280 North College, Suite #500, P.O. Box 1503, Fayetteville, AR 72702
FESOP No.: F141-9083-00139

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**

FESOP Quarterly Report

Source Name: TransMontaigne Terminaling, Inc. (Formerly COZ Terminaling, Inc.)
 Source Address: 20630 West Ireland Road, South Bend, Indiana 46614
 Mailing Address: 280 North College, Suite #500, P.O. Box 1503, Fayetteville, AR 72702
 FESOP No.: F141-9083-00139
 Facility: Source Wide (Tanks and loading racks)
 Pollutant: Volatile Organic Compounds (VOC)
 Limit: 99 tons per year @ 420,059,520 gal/year, rolled on a monthly basis;
 35,004,925 gallons per month for first 12 month (1 year) operation
 YEAR: _____

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

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

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

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for Enhanced New Source Review (ENSR) and a Federally Enforceable State Operating Permit

Source Background and Description

Source Name: TransMontaigne Terminaling, Inc. (Formerly COZ Terminaling, Inc.)
Source Location: 20630 West Ireland Road, South Bend, Indiana 46614
County: St. Joseph
SIC Code: 5171
Operation Permit No.: F141-9083-00139
Permit Reviewer: Manoj P. Patel

The Office of Air Management (OAM) has reviewed an ENSR / FESOP permit application from TransMontaigne Terminaling, Inc. (Formerly COZ Terminaling, Inc.) relating to the operation of a bulk gasoline terminal.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Tank 711 (constructed 1946) - A vertical above ground, internal floating roof tank used for storing gasoline, distillate fuels. The height, diameter and capacity are 40 feet, 60 feet and 840,000 gallons, respectively.
- (b) Tank 702 (constructed 1946) - A vertical above ground, internal floating roof tank used for storing distillate fuel oil. The height, diameter and capacity are 40 feet, 60 feet and 840,000 gallons, respectively.
- (c) Tank 722 (constructed 1951) - A vertical, internal floating roof tank used for storing gasoline. The height, diameter and capacity are 40 feet, 100 feet and 2,310,000 gallons, respectively.
- (d) Tank 732 (constructed 1951) - A vertical above ground, fixed roof cone tank used for storing distillate fuel oil. The height, diameter and capacity are 40 feet, 100 feet and 2,310,000 gallons, respectively.
- (e) Additive 1 (constructed 1996) - A horizontal above ground fixed roof tank identified as GA used for storing fuel additive. The length, diameter and capacity are 21 feet, 8 feet and 8,000 gallons, respectively.
- (f) Additive 2 (constructed 1996) - A horizontal above ground fixed roof tank identified as DA used for storing fuel additive. The length, diameter and capacity are 21 feet, 8 feet and 8,000 gallons, respectively.
- (g) Additive 3 (constructed 1996) - A horizontal above ground fixed roof tank identified as RD used for storing fuel additive. The length, diameter and capacity are 21 feet, 8 feet and 8,000 gallons, respectively.

- (h) One (1) loading bay area identified as area-1 consisting of a loading rack identified as north, consisting five (5) loading arms identified as arm- N₁ to N₅, each have a maximum capacity to deliver 50 gallons of fuel per minutes, loading arm N₁ and N₂ delivers fuel distillates, loading arm N₃, N₄ and N₅ carries gasoline fuels respectively. The VOC emissions from the loading arms identified as N₁ to N₅ are controlled by a vapor collection system and vented to one (1) thermal oxidizer with a heat input capacity of 54,486 Btu/hr.
- (i) One (1) loading bay area identified as A-2 consisting of a loading rack identified as south, consisting five (5) loading arms identified as arm- S₁ to S₅, each have a maximum capacity to deliver 50 gallons of fuel per minutes, loading arm S₁ and S₂ delivers fuel distillates, loading arm S₃, S₄ and S₅ carries gasoline fuels respectively. The VOC emissions from the loading arms identified as S₁ to S₅ are controlled by a one (1) vapor collection system and vented to one (1) thermal oxidizer with a heat input capacity of 54,486 Btu/hr.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

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

- (j) Tank 701 (constructed 1947) - A vertical above ground, internal floating roof tank used for storing gasoline grade fuels. The height, diameter and capacity are 40 feet, 60 feet and 20,000 gallons, respectively.
- (k) Tank 704 (constructed 1946) - A vertical above ground, internal floating roof tank used for storing gasoline grade fuels. The height, diameter and capacity are 40 feet, 42.60 feet and 420,000 gallons, respectively.
- (l) Tank 712 (constructed 1946) - A vertical above ground, internal floating roof tank used for storing gasoline grade fuels. The height, diameter and capacity are 40 feet, 42.60 feet and 420,000 gallons, respectively.
- (m) Tank 714 (constructed 1946) - A vertical above ground, internal floating roof tank used for storing gasoline grade fuels. The height, diameter and capacity are 40 feet, 42.60 feet and 420,000 gallons, respectively.

New Emission Units and Pollution Control Equipment Requiring ENSR

The application also includes information relating to the construction and operation of the following equipment:

- (n) One (1) vertical fixed roof, above ground storage tank identified as EA, used for storing ethyl alcohol. The height, diameter, capacity are 31 feet, 10.50 feet and 20,000 gallons respectively.
- (o) One (1) vertical fixed roof, above ground storage tank(Constructed 1947) identified as 703, used for storing jet kerosene. The height, diameter, capacity are 40 feet, 42.50 feet and 420,000 gallons respectively.
- (p) One (1) loading arm identified as N₆ at loading rack identified as north on loading bay area identified as A-1, maximum capacity to deliver 650 gallons of jet kerosene per minutes, The VOC emissions from the loading arms identified as N₆ are controlled by a one (1) vapor collection system and vented to one (1) thermal oxidizer with a heat input capacity of 54,486 Btu/hr;

- (q) One (1) loading arm identified as S₆ at loading rack identified as south on loading bay area identified as A-2, maximum capacity to deliver 650 gallons of jet kerosene per minutes. The VOC emissions from the loading arms identified as S₆ are controlled by a one (1) vapor collection system and vented to one (1) thermal oxidizer with a heat input capacity of 54,486 Btu/hr.

Insignificant Activities

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

Existing Approvals

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

- (1) CP-141-5932-00139, issued on September 11, 1997.

All existing conditions of this permit have been incorporated with FESOP / ENSR review.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed 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 FESOP 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 Construction Permit application for the purposes of this review was received on October 9, 1997. Additional information was received on December 15, 18, 22, 1997, January 8, 14, 22, 30, and February 9, 1998.

Emission Calculations

The source wide emissions calculation is as follows:

- (a) Tank Farms Emissions (Existing Permitted Tanks):

See appendix A of TSD for detailed VOC emissions from the tanks identified as 711, 702, 722, 732, Additive 1(GA), Additive 2 (DA), and Additive 3 (RD).

(b) Loading Arms Emissions:

See Appendix B and C of TSD for detailed VOC emissions from the loading arms identified as N₁ to N₆ and S₁ to S₆.

(c) Vapor Disposal Unit (VDU)- Thermal Oxidizer:

The thermal oxidizer will combust VOC vapors that have been vented from the loading racks through total 12 loading arms. The vapor disposal unit is rated at 54,486 Btu per hour and gas stream will be supplemented by natural gas combustion. The emissions from the combustion of both fuels must be added to give the total potential emissions for the thermal oxidizer.

Total VOC emissions vented to thermal oxidizer for incineration = 6150 tons/year
 Since assuming that the effluent VOC vapors have the same properties of air,

$$\begin{aligned} \text{VOC effluent flow rate (m)} &= (6150 \text{ tons / year}) \times (2000 \text{ lbs./ ton}) \times (\text{year} / 8760 \text{ hrs.}) \\ &= 1404 \text{ lbs./hour} \end{aligned}$$

Heat required to increase the VOC effluent waste stream temperature from 60°F to 1600°F, allowing 10% loss:

$$Q = 1.10 \times m \times \Delta H$$

Enthalpy difference, ΔH , obtained as follows:

$$\begin{aligned} \text{Enthalpy of air at } 1600^\circ\text{F} & \text{ is } = 398 \text{ Btu/lb.} \\ \text{Enthalpy of air at } 60^\circ\text{F} & \text{ is } = \underline{0.0 \text{ Btu/lb.}} \\ \Delta H & \qquad \qquad \qquad = 398.0 \text{ Btu/lb.} \end{aligned}$$

$$\begin{aligned} Q &= 1.10 \times (1404 \text{ lbs./hr}) \times (398 \text{ Btu/lb.}) \\ &= 614671.20 \text{ Btu/hour} \\ &= 0.61 \text{ MMBtu/hr} \end{aligned}$$

$$\text{Gross heating value of natural gas} = 1,059 \text{ Btu/scf}$$

Fuel Source: Natural Gas	PM/PM ₁₀	SO ₂	NOx	VOC	CO
Emission Factor in lb./MMCF	12.0	0.60	100.0	5.30	21.0
Potential Emissions in tons/year	0.032	0.002	0.27	0.014	0.056

Methodology:

Emission Factors from AP-42, Chapter 1.4, Table 1.4-1, 1.4-2, and 1.4-3, SCC# 1-03-006-03
 Potential Throughput (MMCF) = Heat input Capacity (MMBtu/hr) x (8760 hrs/hr) x (1 MMCF/1,000 MMBtu)
 Emission (tons/year) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb./ton

(d) Fugitive Emissions from Valves and Flanges:

Type	Description	No. of Components	Leak Factor lb./hr	Fugitive VOC lb./hr	Fugitive VOC emissions	
					lb./ year	ton/year
Valves	Light Liquid	107	0.00015	0.0161	146.60	0.073
Loading Arm Valves	Light Liquid	18	0.00087	0.0157	137.20	0.07
Open Ended Lines	Light Liquid	6	0.00650	0.039	341.65	0.18
Flanges	Light Liquid	33	0.00002	0.0007	5.80	0.003
Pump Seals	Light Liquid	18	0.00093	0.0167	146.65	0.073
Total VOC Fugitive Emissions					771.80	0.40

(e) Tank Farm Emissions (Unpermitted and New):

See Appendix A of TSD for detailed VOC emissions calculations.

Summary of Emissions

		PM / PM ₁₀	VOC	NOx	SO ₂	CO	
Permitted Equipment (FESOP)	Tank Farms (711, 702,722,732, GA, DA, RD)	0.0	17.70	0.0	0.0	0.0	
	Loading arms (N ₁ to N ₆ , S ₁ to S ₆)	0.0	5906.50	0.0	0.0	0.0	
	Vapor Disposal Unit (VDU)	0.032	0.014	0.27	0.002	0.056	
	Fugitive Leaks from Valves and Flanges	0.0	0.40	0.0	0.0	0.0	
Equipment under ENSR	Unpermitted Equipment	Tanks (701, 704, 712, 714)	0.0	8.95	0.0	0.0	0.0
	New Equipment	Tanks (703, EA)	0.0	0.42	0.0	0.0	0.0
		Loading arms (N ₆ and S ₆)	0.0	74.20	0.0	0.0	0.0
Total uncontrolled emissions (tons/year)		0.032	6008.20	0.27	0.002	0.056	
Total controlled emissions (tons/year)		0.032	180	0.27	0.002	0.056	

Total Potential and Allowable Emissions (ENSR - the unpermitted and new emission units only)

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	0.0
Particulate Matter (PM10)	0.0	0.0
Sulfur Dioxide (SO ₂)	0.0	0.0
Volatile Organic Compounds (VOC)	99.75	75.00
Carbon Monoxide (CO)	0.0	0.0
Nitrogen Oxides (NO _x)	0.0	0.0
Single Hazardous Air Pollutant (HAP)	0.0	0.0
Combination of HAPs	0.0	0.0

- (a) Allowable emissions are determined from the applicability of rule 40 CFR 60.500 Subpart XX. This rule sets a limit on total organic compounds (TOC) emissions for the vapor collection system as follows:

$$\begin{aligned}
 &= \frac{35 \text{ milligrams of TOC}}{1 \text{ liter}} \times \frac{2.2046 \times 10^{-6} \text{ lbs}}{\text{milligram}} \times \frac{1 \text{ liter}}{0.2642 \text{ gallons}} \\
 &= \frac{2.92 \times 10^{-4} \text{ lbs TOC}}{\text{gallons}} \times \frac{6.83 \times 10^8 \text{ gallons}}{\text{year}} \\
 &= 199517.76 \text{ lbs of TOC / year} \\
 &= 99.75 \text{ tons of TOC / year}
 \end{aligned}$$

- (b) The potential emissions before control are less than the allowable emissions, therefore, the potential emissions before control are used for the permitting determination.
- (c) Allowable emissions (as defined in the Indiana Rule) of volatile organic compounds (VOC) are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, sections 1 and 3, a construction permit is required.

Potential Emissions (for FESOP - entire source)

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

Pollutant	Potential Emissions (tons/year)
PM	0.032
PM-10	0.032
SO ₂	0.0
VOC	6008.20
CO	0.056
NO _x	0.27

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)
Hexane	94.35
Benzene	53.10
Toluene	76.65
2,2,4 Trimethylpentane	47.20
Xylene	29.50
Ethyl Benzene	5.90
TOTAL	300.80

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 326 IAC 1-2-55) of a single HAP- Hexane is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) 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

No previous emission data has been received from the source.

Limited Potential to Emit

- (a) The source has accepted a federally enforceable limit on potential to emit volatile organic compounds (VOC) of 99 tons per year, consisting of:
 - (1) 99 tons per year for the significant activities.
 - (2) There are no insignificant activities at this source.
- (b) The source has accepted a limit on potential to emit 9.40 tons per year for any single HAP and 24 tons per year for any combination of HAPs.
- (c) The table below summarizes the total 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	HAPs
Tanks				27.10			3.90
Thermal Oxidizer from VDU				71.90			20.10
Total Emissions				99.00			24.00

Attached Appendix E of this TSD summarize the Limited fuel throughput from each tank and loading arms to achieve the potential to emit VOC, HAP and other permit requirements.

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
TSP	attainment
PM-10	secondary nonattainment
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (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. St. Joseph County has been designated as attainment or unclassifiable for ozone.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	0.0	0.0	0.0	10.0	0.0	0.0
PSD Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increases are less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

- (a) The loading racks identified as north and south are subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.500, Subpart XX).

Pursuant to 40 CFR Part 60.502, total organic compound emissions shall be limited to 35 milligrams per liter of gasoline loaded. To show compliance with this limit, tests must be performed on the tank trucks, the vapor collection system and the thermal oxidizer. These tests are outlined in 40 CFR Part 60.503.
- (b) The existing above ground vertical internal floating roof tanks identified as 711, 702, 722 and 732 are not subject to 40 CFR Part 60.110, 60.110a and 60.110b, Subpart K, Ka and Kb because they were constructed in 1946 to 1947.
- (c) The Unpermitted vertical internal floating tanks identified as 701, 704, 712 and 714 are not subject to 40 CFR Part 60.110, 60.110a and 60.110b, Subpart K, Ka, and Kb because they were constructed in 1946 and 1947.

- (d) The horizontal above ground storage tanks identified as GA, DA, RD are exempted from the requirement of 40 CFR Part 60.110b because their capacities are less than 40 cubic meters.
- (e) Tank identified as 703 is not subjected to 40 CFR 60.110, 60.110a and 60.110b, subpart K, Ka and Kb because it was constructed in 1946.
- (f) Tank identified as EA is subject to 40 CFR 60.110b, Subpart Kb and it stores Jet Kerosene whose true vapor pressure 0.0085 psia. The owner or operator of tank identified as EA shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be kept for the life of the source.
- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This rule does not apply to this source because the volatile organic compound emissions (VOC) are limited to less than 100 tons per year. This source contains petroleum storage and transfer facilities with a total storage capacity of 8,864,000 gallons which is less than the applicability level of 300,000 barrels (12,600,000 gallons) to qualify this source as a 28 listed major PSD source categories.

326 IAC 2-6 (Emission Reporting)

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

State Rule Applicability - Individual Facilities

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

This rule apply to this source because it is located in the St. Joseph County and is engaged in the business of loading gasoline into any transport, excluding railroad tanks cars and barges. Pursuant to 326 IAC 8-4-4 (Bulk Gasoline Terminals),

- (a) No owner or operator of a bulk gasoline terminal shall permit the loading of gasoline into any transport, excluding railroad tank cars, or barges, unless
 - (1) the bulk gasoline terminal is equipped with a vapor control system, in good working order, in operation and consisting of a vapor collection system which directs all vapors to a fuel gas system or incinerator.
 - (2) Displaced vapors and gases are vented only to the vapor control system.
 - (3) A means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected and,

- (4) All loading and vapor lines are equipped with fittings which make vapor tight connections and which will be closed upon disconnection.

- (b) If employees of the owner of the bulk gasoline terminal are not present during loading, it shall be the responsibility of the owner of the transport to make certain vapor control system is attached to the transport. The owner of the terminal shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times.

All vapors and gases are vented to the vapor control system to thermal oxidizer and hence satisfy the requirements of this rule.

326 IAC 8-4-6 (Petroleum Sources: Petroleum Dispensing Facilities)

This rule does not apply to this source. The facilities identified as N₁ to N₅, S₁ and S₅ are not gasoline dispensing facilities because gasoline isn't dispensed into motor vehicle fuel tanks or portable containers from a storage with a capacity of 575 gallons or more. The loading arms identified as N₆ and S₆ are not the gasoline dispensing facilities because they dispensed jet kerosene and ethyl alcohol (ethanol) into the tanks. Ethyl alcohol has the Reid vapor pressure less than 27.6 kilo Pascals (4psi).

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

This rule apply to this source since it transfers the petroleum products from tanks to transports through the loading racks and arms. Pursuant to 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems),

- (c) The owner or operator of a vapor balance system or vapor control system shall
 - (1) design and operate the applicable system and the gasoline loading equipment in a manner that prevents:
 - (i) gauge pressure from exceeding four thousand five hundred (4,500) pascals (eighteen (18) inches of H₂O) and a vacuum from exceeding one thousand five hundred (1,500) pascals (six (6) inches)) in the gasoline tank truck;
 - (ii) 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 Compounds Leaks from Gasoline Tank Trucks and Vapor Collections Systems", EPA-450/2-78-051, or an equivalent procedure approved by the commissioner during loading or unloading operations at gasoline bulk terminals; and
 - (iii) avoidable visible liquid leaks during loading or unloading operations at gasoline bulk terminals; and
 - (2) within fifteen (15) days, repair and retest a vapor collection or control system that exceeds the limits in subdivision (1).

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit 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 Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

- (a) The tanks, loading arms and thermal oxidizer has applicable compliance monitoring conditions as specified below:
 - (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 result 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 the commissioner upon written request.
 - (2) The thermal oxidizer shall operate at all times when the loading rack and vapor collection system are operated. When operating, the thermal oxidizer shall maintain a minimum operating temperature, fan amperage and duct velocity determined in the compliance tests to maintain a minimum 35 milligram per liter of total organic compounds (TOC) captured.

These monitoring conditions are necessary because the thermal oxidizer must operate properly to ensure compliance with 40 CFR 60, Subpart XX and 326 IAC 12 (New Source Performance Standards).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) 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) Construction Permit Application Form Y.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations on Appendix D of TSD for detailed air toxic calculations.

- (c) The New Source Toxic Control Rule 326 IAC 2-1-3.4 does not apply to this source. It does not emit or has the potential to emit (ir after controls) ten (10) tons per year or more of any hazardous air pollutants or twenty-five (25) tons of any combination of any hazardous air pollutants which are listed in section 112 (b) of the Clean Air Act.

Conclusion

The operation of this bulk gasoline terminal operation shall be subject to the conditions of the attached proposed FESOP Permit No. F141-9083-00139.

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

Addendum to the
Technical Support Document for Enhanced New Source Review (ENSR) and a Federally
Enforceable State Operating Permit (FESOP)

**TransMontaigne Terminaling, Inc.
(Formerly COZ Terminaling, Inc.)
20630 West Ireland Road
South Bend, Indiana 46614**

F-141-9083, Plt ID-141-00139

On March 4, 1998, the Office of Air Management (OAM) had a notice published in the South Bend Tribune, South Bend, Indiana, stating that TransMontaigne Terminaling, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a bulk gasoline terminal with thermal oxidizer as a control. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On March 31, 1998, TransMontaigne Terminaling, Inc. submitted comments on the proposed FESOP. The summary of the comments is as follows:

Comment 1:

Section A.1, page 5 of 38 in the draft FESOP permit, Responsible Official should be corrected to Mr. Dudley Tarlton instead of Mr. Kevin E. Brown.

Response to Comment 1:

OAM agrees with the applicant and made necessary changes in the section A.1 of the draft permit. Section A.1 is changed as follows:

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

The Permittee owns and operates a bulk gasoline terminal.

Responsible Official:	Mr. Kevin E. Brown Dudley Tarlton
Source Address:	20630 West Ireland Road, South Bend, Indiana 46614
Mailing Address:	280 North College, Suite 500, P. O. Box 1503, Fayetteville, AR 72702
SIC Code:	4226
County Location:	St. Joseph
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD;

Comment 2:

Section A.2, page 5 of 38 in the draft FESOP permit, identification of the tanks in the subsection (a) to (d), (g) to (m), (p) and (q) should be changed to incorporate the correct height, diameter and/or product throughput.

Response to Comment 2:

OAM agrees with the applicant and will make the necessary changes in the tanks description, capacity of the loading rack in the final permit. Section A.2, D.1 and D.2 in the final permit has been revised to read as follows:

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

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

- (a) Tank 711 (constructed ~~1946~~ 1947) - A vertical above ground, internal floating roof tank used for storing ~~gasoline, distillate fuels~~ **gasoline or lower vapor pressure products**. The height, diameter and capacity are ~~40~~ 38 feet, 60 feet and ~~840,000~~ 798,000 gallons, respectively.
- (b) Tank 702 (constructed ~~1946~~ 1947) - A vertical above ground, internal floating roof tank used for storing ~~distillate fuel oil~~ **gasoline or lower vapor pressure products**. The height, diameter and capacity are ~~40~~ 35 feet, 60 feet and ~~840,000~~ 729, 246 gallons, respectively.
- (c) Tank 722 (constructed 1951) - A vertical, internal floating roof tank used for storing **gasoline or lower vapor pressure products**. The height, diameter and capacity are ~~40~~ 48 feet, ~~100~~ 90 feet and ~~2,310,000~~ 2,299,962 gallons, respectively.
- (d) Tank 732 (constructed 1951) - A vertical above ground, fixed roof cone tank used for storing distillate fuel oil. The height, diameter and capacity are ~~40~~ 48 feet, ~~100~~ 90 feet and ~~2,310,000~~ 2,299,962 gallons, respectively.
- (e) Additive 1 (constructed 1996) - A horizontal above ground fixed roof tank identified as GA used for storing fuel additive. The length, diameter and capacity are 21 feet, 8 feet and 8,000 gallons, respectively.
- (f) Additive 2 (constructed 1996) - A horizontal above ground fixed roof tank identified as DA used for storing fuel additive. The length, diameter and capacity are 21 feet, 8 feet and 8,000 gallons, respectively.
- (g) Additive 3 (constructed 1996) - A horizontal above ground fixed roof tank identified as RD used for storing fuel additive. The length, diameter and capacity are 21 feet, 8 feet and 8,000 gallons, respectively.
- (h) One (1) loading bay area identified as ~~area~~ **A -1** consisting of a loading rack identified as north, consisting five (5) loading arms identified as arm- N₁ to N₅, each have a maximum capacity to deliver ~~50~~ 600 gallons of fuel per minutes, loading arm N₁ and N₂ delivers fuel distillates, loading arm N₃, N₄ and N₅ carries gasoline fuels respectively. The VOC emissions from the loading arms identified as N₁ to N₅ are controlled by a one (1) vapor collection system and vented to one (1) thermal oxidizer with a heat input capacity of 54,486 Btu/hour;

- (i) One (1) loading bay area identified as A-2 consisting of a loading rack identified as south, consisting five (5) loading arms identified as arm- S₁ to S₅, each have a maximum capacity to deliver ~~650~~ **600** gallons of fuel per minutes, loading arm S₁ and S₂ delivers fuel distillates, loading arm S₃, S₄ and S₅ carries gasoline fuels respectively. The VOC emissions from the loading arms identified as S₁ to S₅ are controlled by a one (1) vapor collection system and vented to one (1) thermal oxidizer with a heat input capacity of 54,486 Btu/hour.
- (j) Tank 701 (constructed 1947) - A vertical above ground, internal floating roof tank used for storing gasoline **or lower vapor pressure products**. The height, diameter and capacity are 40 feet, 60 feet and ~~20,000~~ **840,000** gallons, respectively.
- (k) Tank 704 (constructed 1946) - A vertical above ground, internal floating roof tank used for storing gasoline ~~grade fuels~~ **or lower vapor pressure products**. The height, diameter and capacity are 40 feet, 42.60 feet and 420,000 gallons, respectively.
- (l) Tank 712 (constructed 1946) - A vertical above ground, internal floating roof tank used for storing gasoline ~~grade fuels~~ **or lower vapor pressure products**. The height, diameter and capacity are 40 feet, 42.60 feet and 420,000 gallons, respectively.
- (m) Tank 714 (constructed 1946) - A vertical above ground, internal floating roof tank used for storing gasoline ~~grade fuels~~ **or lower vapor pressure products**. The height, diameter and capacity are 40 feet, 42.60 feet and 420,000 gallons, respectively.
- (n) One (1) vertical fixed roof, above ground storage tank identified as EA, used for storing ethyl alcohol. The height, diameter, capacity are 31 feet, 10.50 feet and 20,000 gallons respectively.
- (o) One (1) vertical fixed roof, above ground storage tank (constructed 1947) identified as 703, used for storing jet kerosene. The height, diameter, capacity are 40 feet, 42.50 feet and 420,000 gallons respectively.
- (p) One (1) loading arm identified as N₆ at loading rack identified as north on loading bay area identified as A-1, maximum capacity to deliver ~~650~~ **600** gallons of ~~jet kerosene~~ **ethanol** per minutes, The VOC emissions from the loading arms identified as N₆ are controlled by a vapor collection system and vented to one (1) thermal oxidizer with a heat input capacity of 54,486 Btu/hour;
- (q) One (1) loading arm identified as S₆ at loading rack identified as south on loading bay area identified as A-2, maximum capacity to deliver ~~650~~ **600** gallons of ~~ethanol~~ **jet kerosene** per minutes, The VOC emissions from the loading arms identified as S₆ are controlled by a vapor collection system and vented to one (1) thermal oxidizer with a heat input capacity of 54,486 Btu/hour.

Comment 3:

Section C.2, page 19 of 38 in the draft permit states that “visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4. It appears that this paragraph and the following paragraph b of this section are ambiguous and unnecessary since a source specific limit on opacity has not been identified in the draft permit. Further, only one of the sources within the terminal is capable of producing visible emissions. TransMontaigne requests that this condition be removed in this entirety or, at least clarified so that it cannot be interpreted as applicable to every source at the facility.

Response to Comment 3:

326 IAC 5-1 (Opacity Limitations) apply to visible emissions, not including condensed water vapor, emitted by or from a facility or source. The requirements of 326 IAC 5 apply to source or facilities located in the St. Joseph County. It requires that the source or its facility should not exceed 30% opacity unless there is a specific opacity limitations for a facility. There is no specific opacity limitations for any of the facilities at the source. Therefore, this Condition will not be changed due to this comment.

Comment 4:

The last sentence of section D.1.2 states “the owner of the terminal shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times.” This seems to be only part of a larger sentence which was inadvertently left out of the draft permit. TransMontaigne requests that this sentence be removed since it makes no sense in its present form. If the Office of Air Management (OAM) would like to correct this sentence, TransMontaigne requests an opportunity to comment on the corrected sentence prior to issuance of the final permit.

Response to Comment 4:

The OAM believes that this sentence is necessary for the rule applicability at the facility. OAM cites the exact sentence from the rule 326 IAC 8-4-4 (Petroleum Sources: Bulk Gasoline Terminals). D.1.2 (b) has been revised to read in the final permit as follows:

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-4]

Pursuant to 326 IAC 8-4-4 (Petroleum sources: bulk gasoline terminals),

- (a) No owner or operator of a bulk gasoline terminal shall permit the loading of gasoline into any transport, excluding railroad tank cars, or barges, unless
 - (1) the bulk gasoline terminal is equipped with a vapor control system, in good working order, in operation and consisting of a vapor collection system which directs all vapors to a fuel gas system or incinerator.
 - (2) Displaced vapors and gases are vented only to the vapor control system.
 - (3) A means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected and,
 - (4) All loading and vapor lines are equipped with fittings which make vapor tight connections and which will be closed upon disconnection.
- (b) If employees of the owner of the bulk gasoline terminal are not present during loading, it shall be the responsibility of the owner of the transport to make certain vapor control system is attached to the transport. The owner of the terminal shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times **comply with 326 IAC 8-4-4.**

Comment 5:

Section D.1.4 contains two throughput limits. One limit is for the storage tanks and the other is for the loading racks. Common sense dictates that only one limit is needed since all petroleum products are first routed through the storage tanks and then to the loading racks. In other words, if a throughput of 302, 806, 990 (tank throughput limit) result in 99 tons per year of VOC emissions from the tanks and loading racks, then the limit of 492, 403, 104 gallons at the loading rack is not needed. The opposite is true if a throughput limit of 492, 403, 104 leads to 99 tons per year of VOC emissions.

Response to Comment 5:

OAM has revised the throughput limit at the tanks and loading racks. The revised appendix E: Potential to Emit (PTE) calculations submitted with this TSD addendum. Due to the revised petroleum product throughput, Condition D.1.4, in the final permit has been revised as follows:

D.1.4 Volatile Organic Compounds (VOC)

The petroleum products from the tanks and loading racks shall be limited to ~~302,806,990 and 492,403,104~~ **420,059,520** gallons per year, rolled on a monthly basis. This production limitation is equivalent to volatile organic compounds (VOC) emissions of 99 tons per year, rolled on a monthly basis. Therefore, 326 IAC 2-7 (Part 70 Program) will not apply.

During the first 12 months of operation, the petroleum products usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed ~~25,234,083 and 41,033,592~~ **35,004,960** gallons per month from tanks and loading racks.

Comment 6:

Condition D.1.5 and D.2.5 (Preventive Maintenance Plan), page 31, 34 of 38 in the draft permit, requires a Preventive Maintenance Plan for the loading bay areas and thermal oxidizer. It is unclear why a PMP is required for the bay areas. TransMontaigne has a clear financial interest in keeping its petroleum products from leaking onto the ground or into the air. TransMontaigne requests that the requirement for a preventive maintenance plan for the loading bays be removed.

Response to Comment 6:

A Preventive Maintenance Plan (PMP) is required for facilities emitting PM, SO₂, or VOC with existing requirements and :

- (a) a NSPS or NESHAP applies; or
- (b) the unit has a control device and the allowable emissions exceed 10 pounds per hour; or
- (c) the unit does not have a controls and the actual emissions exceeds 25 tons per year; or
- (d) the unit would have been subject to an applicable requirement if there was not a condition limiting the potential to emit.

The loading arms identified as N₁ to N₆, S₁ to S₆ located at loading racks identified as north and south at the loading bay area A-1 and A-2, respectively. The allowable VOC emissions from the all facilities is 61.30 tons per year, which exceeds 10 pounds per hour and facilities are connected with a one (1) thermal oxidizer. OAM believes that PMP plans is necessary for all facilities as specified in the permit Condition D.1.5. There will be no change due to this comment.

Comment 7:

Condition D.1.7(a), Page 31 of 38 in the draft permit, contains languages which requires TransMontaigne to maintain the fan amperage and duct velocity at levels “determined in the compliance test to maintain 35 milligram per liter of total organic compounds (TOC) captured”. OAM has correctly identified temperature as the main indicator of VOC destruction. Requirements for maintaining fan amperage and duct velocity are unnecessary and overly burdensome. TransMontaigne requests that the phrase “fan amperage and duct velocity” be removed from the sentence.

Response to Comment 7:

OAM reviewed the compliance stack test performed for the 35 mg of TOC per liter gasoline loaded limit as per 40 CFR 60.500 in June ,1997. There was no burner temperature taken during the test but the report indicated a result of 14.50 mg TOC per liter gasoline. OAM requires the monitoring of the temperature. The Monitoring Condition D.1.7 in the final permit has been revised to read as follows:

D.1.7 Monitoring [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- (a) The thermal oxidizer and vapor collection system shall operate at all times when the any of the loading racks are operated. When operating, the thermal oxidizer shall maintain a minimum operating temperature of **1400° F**, ~~fan amperage and duct velocity as determined in the compliance test~~ to maintain a minimum 35 milligram per liter of total organic compounds (TOC) captured.
- (b) 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 result of the inspection performed on the storage vessels.

Comment 8:

Condition D.2.6 (Testing Requirements), page 34 of 38 in the draft permit is inconsistent with Condition D.1.6 of the permit.

Response to Comment 8:

Loading racks identified as N₆ and S₆ deliver ethanol and jet kerosene, respectively. Their Reid vapor pressures are less than the gasoline vapor pressure as defined in 40 CFR 60.501. The TOC emissions limit of 35 milligram of TOC per 1 liter of gasoline is not applicable to facilities described in section D.2. So, the testing requirement is not necessary for the facilities in the section D.2.

Allowable emissions are determined for facilities described in the section D.1, from the applicability of rule 40 CFR 60.500 Subpart XX. This rule sets a limit of 35 milligram of TOC per 1 liter of gasoline loaded. 40 CFR 60.501 defines gasoline as any petroleum distillate or petroleum distillate / alcohol blend having a Reid vapor pressure of 27.60 kilopascals or greater that is used as fuel for internal combustion engines. Since, facilities described in section D.1 deliver gasoline and hence 35 milligram of TOC per 1 liter of gasoline limit is applicable, testing is required. There will be no changes due to this comment.

Comment 9:

Section D.2.8 (Monitoring), page 35 of 38 in the draft permit repeats section D.1.7 nearly verbatim and should be eliminated.

Response to Comment 9:

OAM reviewed section D.2 under the enhanced new source review requirements and believes that the separate condition is necessary to monitor the thermal oxidizer and vapor collection system. Condition D.2.8 will not be deleted to avoid any future confusion of the monitoring applicability of the facilities in their respective sections. There will be no change due to this comment.

Comment 10:

Condition D.2.9 (Recording Keeping Requirements), page 35 of 38 in the draft permit repeats Condition D.2.7 (Monitoring of Operations) nearly verbatim and should be eliminated.

Response to Comment 10:

Condition D.2.7 (Monitoring of Operations) satisfies the requirements under the 326 IAC 2-8-4 and 326 IAC 2-8-5(a). Condition D.2.9 (Record Keeping Requirements) satisfies the requirements under the 326 IAC 2-8-4(3), requires monitoring and related record keeping and reporting which assures that all reasonable information is provided to evaluate continuous compliance with the applicable requirements. OAM believes that the both conditions should be there under their respective sections. There will be no change due to this comment.

Mail to: Permit Administration & Development Section
Office Of Air Management
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

TransMontaigne Terminals, Inc. (Formerly COZ Terminals, Inc.)
280 North College Avenue, Suite # 500
Fayetteville, AR 72701

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that the TransMontaigne Terminals, Inc. 20630 West Ireland Road, South Bend, Indiana 46614, has constructed the following:
 - (a) Tank 701 (constructed 1947) - A vertical above ground, internal floating roof tank used for storing gasoline or lower vapor pressure products. The height, diameter and capacity are 40 feet, 60 feet and 840,000 gallons, respectively.
 - (b) Tank 704 (constructed 1946) - A vertical above ground, internal floating roof tank used for storing gasoline or lower vapor pressure products. The height, diameter and capacity are 40 feet, 42.60 feet and 420,000 gallons, respectively.
 - (c) Tank 712 (constructed 1946) - A vertical above ground, internal floating roof tank used for storing gasoline or lower vapor pressure products. The height, diameter and capacity are 40 feet, 42.60 feet and 420,000 gallons, respectively.
 - (d) Tank 714 (constructed 1946) - A vertical above ground, internal floating roof tank used for storing gasoline or lower vapor pressure products. The height, diameter and capacity are 40 feet, 42.60 feet and 420,000 gallons, respectively.
 - (e) One (1) vertical fixed roof, above ground storage tank identified as EA, used for storing ethyl alcohol. The height, diameter, capacity are 31 feet, 10.50 feet and 20,000 gallons respectively.
 - (f) One (1) vertical fixed roof, above ground storage tank (constructed in 1947) identified as 703, used for storing jet kerosene. The height, diameter, capacity are 40 feet, 42.50 feet and 420,000 gallons respectively.
 - (g) One (1) loading arm identified as N₆ at loading rack identified as north on loading bay area identified as A-1, maximum capacity to deliver 600 gallons of ethanol per minutes, The VOC emissions from the loading arms identified as N₆ are controlled by a vapor collection system and vented to one (1) thermal oxidizer with a heat input capacity of 54,486 Btu/hour;
 - (h) One (1) loading arm identified as S₆ at loading rack identified as south on loading bay area identified as A-2, maximum capacity to deliver 600 gallons of jet kerosene per minutes, The VOC emissions from the loading

arms identified as S₆ are controlled by a vapor collection system and vented to one (1) thermal oxidizer with a heat input capacity of 54,486 Btu/hour.

in conformity with the requirements and intent of the Construction Permit Application that was turned into a Federally Enforceable State Operating Permit (FESOP) application and received by the Office of Air Management on October 9, 1997; and as permitted pursuant to **FESOP No. F-141-9083-00139** issued on _____

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 19 _____.

My Commission expires: _____

Signature

Name (typed or printed)

APPENDIX: A EMISSIONS CALCULATIONS

TransMontaigne Terminating, Inc.
F141-9083-00139

POTENTIAL EMISSIONS

(A) **Tank Farm Emissions (Existing Tanks):**

(Tanks: 711, 702, 722, 732, Additive 1, Additive 2 and Additive 3)

Tanks 711, 722, 702 and 732 will store gasoline and Additive Tanks 1, 2 and 3 will store fuel additive. The following table summarizes the tank characteristics and VOC emissions. The emissions were determined using EPA's TANKS Program Version 3.0.

Tank ID	Type of tank	Tank Dimensions			Annual Net Throughput (gal/yr)	Max. Liquid Height (ft)
		Height	Diameter	Capacity		
711	Vertical IFR*	40	60	840,000 gal	26,441,856	36
702	Vertical IFR*	40	60	840,000 gal	24,155,712	36
722	Vertical IFR*	40	100	2,310,000 gal	77,139,216	36
732	Vert. IFR*	40	100	2,310,000 gal	77,567,112	36
Add. 1/GA	Horizontal	21 feet	8 feet	8,000 gal	36,001	8
Add. 2/ DA	Horizontal	21 feet	8 feet	8,000 gal	18,000	8
Add. 3 / RD	Horizontal	21 feet	8 feet	8,000 gal	2,369	8

* IFR - Internal floating roof

Tank ID	Vapor Molecular Weight	Average Vapor Pressure, psi	Average Liquid Surface Temp. (EF)	Liquid Bulk Temp, EF	Standing Losses (lb/yr)	Working Losses (lb/yr)	Total Losses (lbs/yr.)
711	62	6.5	50.9	49.4	5701.5	74.50	5776.0
702	130	0.0074	50.9	49.4	6749.0	90.0	6839.0
722	62	6.5	50.9	49.4	11,229.70	143.80	11,373.50
732	130	0.0074	50.9	49.4	11,230	152.50	11,382.50
Add. 1 /GA	130	0.0074	50.9	49.4	10.4	4.40	14.75
Add. 2 / DA	130	0.0074	50.9	49.4	5.10	1.10	6.20
Add. 3/ RD	130	0.0074	50.9	49.4	0.60	1.20	1.80

(B) Tank Farm Emissions (unpermitted and New tanks):

Tank identified as 701, 704, 712 and 714 are internal floating roof tanks. It will store gasoline grade RVP or distillate fuels. Tanks identified as 703 and EA are vertical fixed roof storage tanks. Tanks 703 and EA will store jet kerosene and ethyl alcohol, respectively. The following table summarizes the tank characteristics and VOC emissions. The emissions were determined using EPA's TANKS Program Version 3.0.

Unpermitted Tanks:

Tank ID	Type of tank	Tank Dimensions			Fuel stored	Max. Liquid Height (ft)
		Height feet	Diameter feet	Capacity gallons		
701	Vertical IFR*	40	60	840,000	gasoline*	36
704	Vertical IFR*	40	42.60	420,000	gasoline*	36
712	Vertical IFR	40	42.60	420,000	gasoline*	36
714	Vertical IFR	40	42.60	420,000	gasoline*	36

*gasoline includes the RVP 15, RVP 14, RVP 13 or less.

New Tanks:

Tank ID	Type of tank	Tank Dimensions			Fuel stored	Max. Liquid Height (ft)
		Height feet	Diameter feet	Capacity gallons		
Additive 4 / EA	Vertical Fixed Roof	31	10.50	20,000	Ethyl Alcohol	30
703	Vertical Fixed Roof	40	42.5	420,000	Jet Kerosene	38

Total VOC Emissions from the Unpermitted and New Tanks:

Tank ID	Vapor Molecular Weight	Average Vapor Pressure, psi	Average Liquid Surface Temp. (EF)	Liquid Bulk Temp, EF	Standing Losses (lb/yr)	Working Losses (lb/yr)	Total Losses (lbs./yr)
701	62	6.5	50.9	49.4	5702.0	84.50	5786.50
704	62	6.5	50.9	49.4	3975.0	60.0	4040
712	632	6.5	50.9	49.4	3982.50	60.0	4042.50
714	62	6.5	50.9	49.4	3982.50	60.0	4042.50
Additive 4 / EA	46	0.5645	50.9	49.4	75.70	496.80	572.50
703	130	0.0074	50.9	49.4	40.60	214.90	255.50

Appendix C: Emissions Calculations

VOC emissions calculations from 10 Existing Loading Arms

Company Name: TransMountainage Terminaling, Inc.
Address City IN Zip: 20630 West Ireland Road, South Bend, Indiana 46614
CP: F 141-9083-00139
Plt ID: 141-00139
Reviewer: Manoj P. Patel
Date: December 29,1997

Product	Total loading arm	Maximum Throughput to Truck (1,000 gal/hr)	Saturation Factor (S)	True Vapor Pressure (psia)	MW (lb./lb.-mole)	Temperature of liquid R	Loading Loss lb./1000 gallons	Potential Emissions in lb./hr	Potential Emissions in tons/year
Gasoline (RVP-13)	6	39	0.6	6.23	63	510	34.52	1346.31	5896.82
Distillate fuel	4	39	0.6	0.0074	130	510	0.06	2.20	9.64

Potential VOC emissions from the two new loading arms is considered based on the potential throughput from the particular tank is considered.

One loading rack is allocated for the Ethanol and other is allocated for the Jet Kerosene is considered only.

nsidered based on the volume capacity of the tanks and one turn over ratio per day only.

Methodology:-

oading Loss = $12.46 * (SPM / T)$

Loading loss = Loading loss, pounds per 1000 gallons of liquid loaded

S= a saturation factor (from table 5.2-1, AP-42, Fifth Edition, January 1995)

P = True Vapor Pressure of liquid loaded, pounds per square inch absolute (psia) (Table 7.1-2, 7.1-3) (AP-42, Fifth Edition, January -1995)

M = Molecular Weight of Vapors, Pounds per pound-mole (lb./lb.-mole) (Table 7-1.2, AP-42, Fifth Editio, Jan. 1995)

T = Temperature of bulk liquid loaded, R = (F + 460)

Potential Emissions in lb./hr = Loading loss(lb./1000 gallons) * (Maximum Throughput 1,000 gallons /hr)

Potential Emissions in ton/hr = Potential Emissions lb./hr * 8760 hrs./year * 1 ton/2000 lb.

Appendix D: HAP Emission Calculations

Company Name: TransMontaigne Terminating, Inc.
Plant Location: 20630 west Ireland Road, South Bend, Indiana 46614
County: St. Joseph
Permit Reviewer: Manoj P. Patel
Date: January 9, 1998

	Gasoline	Distillate
Potential VOC emissions	5897	9.64

HAP	HAP percentage by weight for Gasoline	HAP percentage by weight Distillate	HAP Emissions from Gasoline	HAP Emissions from Distillate
Hexane	1.60%	NA	94.352	NA
Benzene	0.90%	0.004%	53.073	0.0004
Toluene	1.30%	0.08%	76.661	0.01
2,2,4 Trimethylpentane	0.80%	NA	47.176	NA
Xylene	0.50%	0.26%	29.485	0.03
Ethyl Benzene	0.10%	0.05%	5.897	0.005
MTBE	NA	NA	NA	NA
Phenol	NA	0.07%	NA	0.01
Naphthalene	NA	0.28%	NA	0.03
Cumene	NA	0.06%	NA	0.01
Biphenyl	NA	0.12%	NA	0.01

METHODOLOGY

HAPS emission rate (tons/yr) = VOC Potential emissions (tons/year) * Weight % HAP

Potential to Emit VOC and HAP

Company Name: TransMontaigne Terminaling, Inc.
Address, City, IN Zip 20630 West Ireland Road, South Bend, Indiana 46614
CP # F141-9083-00139
Plt. ID # 141-00139
Reviewer: Manoj P. Patel
Date: January, 12, 1998

Capacity of loading arm	No. of arms	total capacity gal./hr	total capacity /year	lbs. TOC	tons TOC
62.88	12	45,274	396,596,736	115,806	57.90

Throughput limit per year	Limit/month
396,596,736	33,049,728