

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FIELD INSPECTION REPORT**



SOURCE INFORMATION	
<u>SOURCE NAME</u>	Kinder Morgan Phoenix Holdings – Indianapolis Terminal
<u>SOURCE LOCATION</u>	2500 N Tibbs Avenue, Indianapolis, IN 46222 Marion County
<u>MAILING ADDRESS</u>	622 131 st Place, Hammond, IN 46327
<u>PLANT ID</u>	097-00076
<u>PERMIT INFORMATION</u>	Permit Type: FESOP Permit Number: 097-42907-00076 Permit Expiration Date: 12/04/2028 VFC Document No.(hyperlink): 83004778
<u>ATTAINMENT STATUS</u>	<input checked="" type="checkbox"/> Attainment for all criteria pollutants <input type="checkbox"/> Nonattainment for <input type="checkbox"/> SO ₂ <input type="checkbox"/> CO <input type="checkbox"/> O ₃ <input type="checkbox"/> NO ₂ <input type="checkbox"/> Pb <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5}
<u>SOURCE STATUS</u>	<input type="checkbox"/> PSD Major (326 IAC 2-2) <input type="checkbox"/> Major Source of HAPs <input type="checkbox"/> Emission Offset (326 IAC 2-3) <input type="checkbox"/> Area Source of HAPs <input type="checkbox"/> Acid Rain (326 IAC 21)
<u>SOURCE DESCRIPTION</u>	The source is a stationary gasoline and ethanol terminal.

INSPECTION INFORMATION					
<u>INSPECTED BY</u>	Kurt Graham				
<u>INSPECTION DATE AND TIME</u>	12/09/2020	TIME IN: 13:00	TIME OUT: 14:15		
<u>REPORTED BY</u>	Kurt Graham	REPORT DATE: 12/14/2020			
<u>COMPLIANCE PERIOD REVIEWED</u>	2016 to 2020				
<u>INSPECTION NOTIFICATION</u>	<input type="checkbox"/> Unannounced <input checked="" type="checkbox"/> Announced: Due to the COVID-19 situation, the source was contacted prior to the inspection to review inspection protocols.				
<u>INSPECTION OBJECTIVE(S)</u>	<input checked="" type="checkbox"/> Compliance Monitoring Strategy (CMS) <input type="checkbox"/> Commitment <input type="checkbox"/> Mega-Site: <input type="checkbox"/> FCE <input type="checkbox"/> PCE <input type="checkbox"/> Complaint <input type="checkbox"/> Other: <input type="checkbox"/> Surveillance				
<u>ACES TRACKING NUMBER(S)</u>	Inspection:	253142	Complaint:	N/A	Violation/Warning: 253159
<u>RM TRACKING NUMBER(S)</u>	Complaint:	N/A			
<u>INSPECTION BACKGROUND</u>	Less than ten (10) employees work at the facility. The source operates 24 hours per day, seven (7) days per week.				

SOURCE PERSONNEL INTERVIEWED			
<i>Name</i>	<i>Title</i>	<i>Phone Number</i>	<i>Email Address</i>
Dan LoGreco	Midwest EHS Manager	(219) 852-3153	Daniel_logreco@kindermorgan.com
Jack Halstead	Terminal Operator		

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
<i>Date</i>	<i>Inspection/Complaint Type</i>	<i>Result</i>	<i>Comments</i>
05/19/2016	CMS	No Violations Noted	

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)			
Informal Enforcement Actions			
Date Issued	Action Taken	Describe Violation(s)	
05/23/2017	Violation Letter	Failure to properly use emission controls	
Formal Enforcement Actions			
Case Number	Enforcement Type	Civil Penalty	Describe Violation(s)
Pending	Formal Enforcement	Pending	Excess emissions during stack test. The case is currently being processed. An enforcement action letter was issued on 01/24/2020.
Other Relevant Actions			
Action Taken	Comments		
N/A	N/A		

PERMIT SECTION D.1		
Emission Units and Control Devices:		
<ul style="list-style-type: none"> Loading rack 		
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input checked="" type="checkbox"/> CO <input checked="" type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input checked="" type="checkbox"/> HAPS		
Applicable Rules:		
<ul style="list-style-type: none"> 326 IAC 8-4-4 326 IAC 8-4-9 		
Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Recordkeeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: Fuel throughput records, transport testing records, control device operating parameters		
Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Observations and Comments:		
<p>The loading rack was observed in operation during the inspection. The source was using the vapor combustion unit (VCU) to control emissions from the loading rack at the time of the inspection. Mr. LoGreco and Mr. Halstead stated the vapor recovery unit (VRU) was not operating due to maintenance issues. No visible emissions were observed from the VCU exhaust during the inspection. Observed equipment appeared to be in good working order.</p> <p>The most recent quarterly report stated the facility had a throughput less than the applicable limit.</p> <p>A stack test while controlling emissions with the VCU was conducted on 09/25/2019. During this test, the emission limit for VOCs was exceeded. CO and HAP emissions were within applicable limits. VOC emissions were within applicable limits on a retest conducted on 09/26/2019. The violation due to the failed stack test is currently in processing with the OAQ Enforcement Section.</p> <p>Records including transport testing records, control device operating parameters were spot checked dating to the previous inspection and found to be adequate.</p> <p>A preventative maintenance plan for the facility was reviewed and found to be adequate.</p>		
Permit Section Compliance Status:		
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:		
<i>Condition/Citation</i>	<i>Comments</i>	
N/A	N/A	

PERMIT SECTION D.2						
Emission Units and Control Devices:						
<ul style="list-style-type: none"> Storage tanks 						
Pollutants with Emission Limits or Applicable Standards:						
<input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input checked="" type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input type="checkbox"/> HAPS						
Applicable Rules:						
<ul style="list-style-type: none"> 326 IAC 8-4-3 						
Requirement:	Applicable	Violation Noted				
Emission Limitations and Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Preventive Maintenance Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Compliance Determination Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Compliance Monitoring Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Recordkeeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Types of Records Reviewed: Tank inspections, storage records						
Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Observations and Comments:						
<p>The tanks were observed in various states of operation during the inspection. Storage tanks #7 and #8 were out of service at the time of the inspection for maintenance activities. The remaining tanks were in use. The tanks appeared to be in good working order and no signs of leaks were observed.</p> <p>Tank inspection and storage records were spot checked dating to the previous inspection and found to be adequate.</p> <p>A preventative maintenance plan for the facility was reviewed and found to be adequate.</p>						
Permit Section Compliance Status:						
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:						
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: left; padding: 2px;">Condition/Citation</th> <th style="text-align: left; padding: 2px;">Comments</th> </tr> <tr> <td style="padding: 2px;">N/A</td> <td style="padding: 2px;">N/A</td> </tr> </table>	Condition/Citation	Comments	N/A	N/A		
Condition/Citation	Comments					
N/A	N/A					

PERMIT SECTION D.3		
<u>Emission Units and Control Devices:</u>		
• Boilers		
<u>Pollutants with Emission Limits or Applicable Standards:</u>		
<input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input type="checkbox"/> VOC <input checked="" type="checkbox"/> PM <input checked="" type="checkbox"/> PM ₁₀ <input checked="" type="checkbox"/> PM _{2.5} <input type="checkbox"/> HAPS		
<u>Applicable Rules:</u>		
• 326 IAC 6-2-4		
<u>Requirement:</u>	<u>Applicable</u>	<u>Violation Noted</u>
Emission Limitations and Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Recordkeeping Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: N/A		
Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<u>Observations and Comments:</u>		
The boilers are used for heating at the facility. The boilers were observed in various states of operation and appeared to be in good working order.		
A preventative maintenance plan for the facility was reviewed and found to be adequate.		
<u>Permit Section Compliance Status:</u>		
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:		
<i>Condition/Citation</i>	<i>Comments</i>	
N/A	N/A	

PERMIT SECTION E.1		
Emission Units and Control Devices:		
• Loading Rack		
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input checked="" type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input type="checkbox"/> HAPS		
Applicable Rule:		
40 CFR 60 Subpart XX		
Applicability Information:		
Affected facility		
Requirement:	Applicable	Violation Noted
Emission Limitations/Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Work Practice/Operating Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Record Keeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: Transport testing records, leak inspection records		
Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan [326 IAC 1-6-3]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Observations and Comments:		
Monthly leak inspection records were spot checked dating to the previous inspection and found to be adequate.		
See Section D.1 for additional information.		
Permit Section Compliance Status:		
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:		
<i>Condition/Citation</i>	<i>Comments</i>	
N/A	N/A	

PERMIT SECTION E.2		
<u>Emission Units and Control Devices:</u>		
<ul style="list-style-type: none"> Loading rack Storage tanks 		
<u>Pollutants with Emission Limits or Applicable Standards:</u>		
<input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input checked="" type="checkbox"/> HAPS		
<u>Applicable Rule:</u>		
40 CFR 63 Subpart BBBBBB		
<u>Applicability Information:</u>		
Existing Source		
<u>Requirement:</u>	<u>Applicable</u>	<u>Violation Noted</u>
Emission Limitations/Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Work Practice/Operating Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Record Keeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<u>Types of Records Reviewed:</u>		
Reporting Requirements	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan [326 IAC 1-6-3]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<u>Observations and Comments:</u>		
<p>The storage tanks are equipped with internal floating roofs and good air pollution control practices appear to be followed. Monthly leak inspections are performed. Records of these inspections were spot checked dating to the previous inspection and found to be adequate.</p> <p>See Sections D.1 and D.2 for additional information.</p>		
<u>Permit Section Compliance Status:</u>		
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:		
<i>Condition/Citation</i>	<i>Comments</i>	
N/A	N/A	

ADDITIONAL SOURCE COMPLIANCE REVIEW:

The following reports are required and were reviewed:

- ☒ Annual Compliance Certification(s) ☒ Deviation & Compliance Monitoring Report(s)
☐ Annual Notification(s) ☐ Emission Statement(s)

The reports are consistent with inspection observations. ☒ Yes ☐ No ☐ N/A

The permit accurately represents emission units observed on site. ☐ Yes ☒ No ☐ N/A

Compliance assistance was provided during the inspection. ☒ Yes ☐ No ☐ N/A

The source is required to have a Risk Management Plan [40 CFR 68]. ☐ Yes ☒ No
 If yes, the source has a plan. ☐ Yes ☐ No ☒ N/A
 If yes, the employees have been trained. ☐ Yes ☐ No ☒ N/A

Additional Information and Comments:

The source operates a diesel-fired generator for operation of the facility's electric fire pump. During the inspection, the boilerplate information was unable to be located. After initial research, Mr. LoGreco stated he believed the generator has a rating of 449 horsepower and was installed in 2016.

Construction and operation of this unit without a proper permit revision constitutes a violation of 326 2-8-11.1.

Additional Source Compliance Review Status:

- ☐ No violations were observed or determined at the time of the inspection.
☒ The following violations were determined at the time of the inspection:

<i>Condition/Citation</i>	<i>Description of Violation(s)</i>
326 2-8-11.1	Construction and operation of a diesel-fired generator without a proper permit revision.

INSPECTION FINDINGS

- ☐ No violations were observed or determined at the time of the inspection.
☒ The following violations were determined at the time of the inspection:

<i>Condition/Citation</i>	<i>Description of Violation(s)</i>
326 2-8-11.1	Construction and operation of a diesel-fired generator without a proper permit revision.

RECOMMENDED ACTION Issue inspection summary/violation letter.

EXIT INTERVIEW I explained my findings, recommendations, and conclusions with Mr. LoGreco prior to exiting the facility and in follow-up communication.

ATTACHMENTS

- None