



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

Southwest Regional Office • 114 South 7th Street, • Petersburg, IN 47567-0128

(888) 672-8323 • (812) 380-2305 • Fax (812) 380-2304 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Eric J. Holcomb**  
Governor

**Brian C. Rockensuess**  
Commissioner

June 26, 2024

VIA ELECTRONIC MAIL

Mr. Ben Hoene  
MPLX Terminals Mt. Vernon Terminals  
129 Barter Street  
Mt. Vernon, IN 47620  
[bhoene@marathonpetroleum.com](mailto:bhoene@marathonpetroleum.com)

Re: Inspection Summary Letter  
MPLX Terminals Mt. Vernon Terminals  
Source ID 129-00005  
Mt. Vernon, Posey County

Dear Mr. Ben Hoene:

On June 18, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of MPLX Terminals Mt. Vernon Terminals, located at 129 Barter Street in Mt. Vernon, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Inspection Type: Commitment  
Inspection Results: No violations were observed

Please direct any questions to me at 812-582-0614 or by email at [droos@idem.in.gov](mailto:droos@idem.in.gov).

Sincerely,

Daniel Roos, Compliance Inspector  
Southwest Regional Office  
Office of Air Quality

ACES ID: 298495

cc: Daniel Roos, Compliance and Enforcement Branch, Office of Air Quality  
Chris Peters, MPLX Terminals, [cspeters@marathonpetroleum.com](mailto:cspeters@marathonpetroleum.com)  
Amanda Billings, MPLX Terminals, [abillings@marathonpetroleum.com](mailto:abillings@marathonpetroleum.com)

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



SOURCE INFORMATION	
SOURCE NAME	MPLX Terminals Mt. Vernon Terminals
SOURCE LOCATION	129 Barter Street, Mt. Vernon, Indiana Posey County
MAILING ADDRESS	129 Barter Street, Mt. Vernon, IN 47620
PLANT ID	129-00005
<u>PERMIT INFORMATION</u>	Permit Type: FESOP Permit Number: 129-47397-00005 Permit Expiration Date: 7/28/2025 VFC Document No.(hyperlink): <a href="#">83616141</a>
ATTAINMENT STATUS	<input checked="" type="checkbox"/> Attainment for all criteria pollutants <input type="checkbox"/> Nonattainment for <input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> CO <input type="checkbox"/> O <sub>3</sub> <input type="checkbox"/> NO <sub>2</sub> <input type="checkbox"/> Pb <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub>
SOURCE STATUS	<input checked="" 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 petroleum storage and distribution terminal.

INSPECTION INFORMATION			
INSPECTED BY	Daniel Roos		
INSPECTION DATE AND TIME	June 18, 2024	TIME IN: 9:30 AM	TIME OUT: 12:00 PM
REPORTED BY	Daniel Roos	REPORT DATE: 6/21/2024 <i>DAR</i>	
<u>COMPLIANCE PERIOD REVIEWED</u>	January 2022 to June 2024		
<u>INSPECTION NOTIFICATION</u>	<input checked="" type="checkbox"/> Unannounced <input type="checkbox"/> Announced:		
INSPECTION OBJECTIVE(S)	<input checked="" type="checkbox"/> Compliance Monitoring Strategy (CMS) <input type="checkbox"/> Mega-Site: <input type="checkbox"/> FCE <input type="checkbox"/> PCE <input type="checkbox"/> Other:		<input checked="" type="checkbox"/> Commitment <input type="checkbox"/> Complaint <input type="checkbox"/> Surveillance
ACES TRACKING NUMBER(S)	Inspection: 298495	Complaint:	Violation/Warning:
RM TRACKING NUMBER(S)	Complaint:		
<u>INSPECTION BACKGROUND</u>	The source operates under a Title V administrative amendment issued March 25, 2024. The source was last inspected on November 10, 2021, where no violations were observed. IDEM OAQ has not received any recent complaints for the source.		

SOURCE PERSONNEL INTERVIEWED			
Name	Title	Phone Number	Email Address
Chris Peters	Terminal Group Manager	270-201-0332	<a href="mailto:cspeters@marathonpetroleum.com">cspeters@marathonpetroleum.com</a>
Amanda Billings	Adv. Admin Assistant	812-838-2300	<a href="mailto:abillings@marathonpetroleum.com">abillings@marathonpetroleum.com</a>

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
Date	Inspection/Complaint Type	Result	Comments
11/10/2021	CMS	No Violations Noted	<a href="#">83242994</a>
11/21/2019	CMS	No Violations Noted	<a href="#">82875791</a>

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)			
Informal Enforcement Actions			
Date Issued	Action Taken	Describe Violation(s)	
5/12/2023	Violation Letter	EAL for Violations of D.1.1(a), 1.1(b), and D.1.4 for failing to operate the VRU when unloading gasoline fuel and for exceeding BACT Emissions. Case Pending: <a href="#">83477908</a>	
7/23/2019	Violation Letter	VL of D.1.2 for failing to capture vapors from the barge loading operation <a href="#">82824778</a>	
Formal Enforcement Actions			
Case Number	Enforcement Type	Civil Penalty	Describe Violation(s)
N/A		\$	
Other Relevant Actions			
Action Taken	Comments		

PERMIT SECTION D.1		
Emission Units and Control Devices:		
<ul style="list-style-type: none"> <li>• One Two Lane Truck Loading Rack</li> <li>• One Barge Loading Rack</li> </ul>		
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> CO <input checked="" type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub> <input checked="" type="checkbox"/> HAPS		
Applicable Rules:		
<ul style="list-style-type: none"> <li>• 326 IAC 8-1-6</li> </ul>		
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: Petroleum Throughput Records, Daily Vacuum Pressure for VRU, Monthly Leak Inspection Records		
Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Observations and Comments:		
I observed the equipment in operation during the inspection. The barge loadout was loading gasoline and diesel fuel during the inspection. The source stated they only transfer diesel fuel in the truck loadout. D.1.1, 1.4 – I observed the vapor recovery system (VRU) in operation during the inspection. I observed the source following the proper leak prevention measures and loading practices. The source maintains a database of all truck drivers, their tanks, and their leak tightness documentation. The trucks cannot dock on the loading rack without the documentation on file.		

PERMIT SECTION D.1			
D.1.2 – The source reported in their 2024 1 <sup>st</sup> quarterly report 0.086 tons of single HAP, and 0.303 tons of combined HAPs were emitted in the twelve-month period ending March 2024. This is below the limits of 9.30 tons single HAPs and 23.10 tons combined HAPs. D.1.3 – I observed the preventive maintenance plan and deemed it adequate. D.1.5 – The source is required to conduct VOC testing every 5 years. The most recent test was conducted on September 13, 2022. The stack test had been conducted timely. D.1.7, 1.9 – I observed the daily monitoring records for the VRU (carbon absorber) from January 2022 to June 2024 and deemed them complete. The source maintained records of the daily lowest maximum vacuum level until June 2023, where they switched to a continuous monitoring system which maintained records of the organic compound concentration. D.1.8, 1.9 – I observed the monthly visual leak inspection records from January 2022 to June 2024 and deemed them complete. The source conducts leak inspections daily and weekly. I observed the petroleum product throughput records from January 2022 to June 2024 and deemed them complete. D.1.10 – The quarterly reports have been submitted in a timely manner.			
Emission Unit or Control Device	Parameter	Permitted Value/Range	Observation
VRU	Organic Compound Concentration		0.02% C3H8
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:			

PERMIT SECTION E.1		
Emission Units and Control Devices:		
<ul style="list-style-type: none"> <li>One Two Lane Truck Loading Rack</li> </ul>		
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> CO <input checked="" type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub> <input type="checkbox"/> HAPS		
Applicable Rule:		
326 IAC 12,40 CFR 60 Subpart XX		
Applicability Information:		
Bulk Gasoline Terminal		
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 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
Types of Records Reviewed: Leak Inspection Records, Truck Identification Records		
Reporting Requirements	<input checked="" 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
Observations and Comments:		
I observed the equipment in operation during the inspection. The VRU is not used during truck loadout since the facility only loads diesel fuel into trucks. The source maintains a database of all truck drivers, their tanks, and their leak tightness documentation. The trucks cannot dock on the leading rack without the documentation on file. I observed the		

PERMIT SECTION E.1			
monthly leak detection inspection records from January 2022 to June 2024 and deemed them complete. The source conducts leak detection inspection weekly. The source reported in their 2023 1 <sup>st</sup> Quarterly report a deviation for failing to record the required monthly leak detection inspection within the timeframe of a month. After realizing the deviation had occurred, the source started recording the monthly leak detection inspections weekly. After looking through their maintenance records and noting the source also conducts leak detection inspections daily, no violations were observed.			
Emission Unit or Control Device	Parameter	Permitted Value/Range	Observation
VRU	Required when transferring gasoline and ethanol products		Not used in truck loadout
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:			

PERMIT SECTION E.2			
Emission Units and Control Devices:			
<ul style="list-style-type: none"> <li>• One Internal Floating Roof Tank Identified as M1</li> </ul>			
Pollutants with Emission Limits or Applicable Standards:			
<input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> CO <input checked="" type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub> <input checked="" type="checkbox"/> HAPS			
Applicable Rule:			
326 IAC 12, 40 CFR 60 Subpart Kb			
Applicability Information:			
Internal Floating Roof			
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 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	
Types of Records Reviewed: Visible 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:			
I observed the tank on site during the inspection. The source conducts the tank inspections quarterly. I observed the visible inspection records from January 2022 to June 2024 and deemed them complete. I did not observe the internal floating roof during the inspection.			
Emission Unit or Control Device	Parameter	Permitted Value/Range	Observation
N/A			
Permit Section Compliance Status:			

**PERMIT SECTION E.2**

No violations were observed or determined for this permit section at the time of the inspection.  
 The following violations were determined for this permit section at the time of the inspection:

**PERMIT SECTION E.3**

Emission Units and Control Devices:

- One Barge Loading Rack

Pollutants with Emission Limits or Applicable Standards:

SO<sub>2</sub>  NO<sub>x</sub>  CO  VOC  PM  PM<sub>10</sub>  PM<sub>2.5</sub>  HAPS

Applicable Rule:

40 CFR 63 Subpart Y, 326 IAC 20-17

Applicability Information:

Barge Loading Gasoline

Requirement:	Applicable	Violation Noted
--------------	------------	-----------------

Emission Limitations/Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
--------------------------------	---	--

Work Practice/Operating Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
--------------------------------------	---	--

Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
------------------------------------	--	--

Testing Requirements	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
----------------------	--	--

Record Keeping Requirements	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
-----------------------------	--	--

Types of Records Reviewed: Leak Detection Records, Annual Emission Statements, Operation and Maintenance Inspections

Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input 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 type="checkbox"/> No
---	---	--

Observations and Comments:

I observed the equipment in operation during the inspection. The barge loadout was loading gasoline and diesel fuel during the inspection. The source submits the annual emission statements semi-annual with the semi-annual NESHAP BBBB reports. There have been no leaks that could not be repaired within the 15-day timeframe. I observed the written operation and maintenance plan and deemed it adequate. I observed the leak detection records, operation and maintenance records, and throughput records from January 2022 to June 2024 and deemed them complete. The source conducts leak inspections weekly and overall maintenance is completed quarterly

Emission Unit or Control Device	Parameter	Permitted Value/Range	Observation
VRU			In Operation

Permit Section Compliance Status:

No violations were observed or determined for this permit section at the time of the inspection.  
 The following violations were determined for this permit section at the time of the inspection:

**PERMIT SECTION E.4**

Emission Units and Control Devices:

- One Two Lane Truck Loadout
- Eight Internal Floating Roof Storage Tanks

Pollutants with Emission Limits or Applicable Standards:

SO<sub>2</sub>  NO<sub>x</sub>  CO  VOC  PM  PM<sub>10</sub>  PM<sub>2.5</sub>  HAPS

<b>PERMIT SECTION E.4</b>			
<u>Applicable Rule:</u>			
40 CFR 63 Subpart BBBBBB			
<u>Applicability Information:</u>			
Bulk Gas Terminal			
<u>Requirement:</u>	<b>Applicable</b>	<b>Violation Noted</b>	
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	
Types of Records Reviewed: Leak Detection Records, Vapor tightness Records of Truck Tanks, VRU Vapor Recovery Records			
Reporting Requirements	<input checked="" 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>I observed the equipment in operation during the inspection.</p> <p>63.11087, 63.11088, 63.11089 –The VRU is not used during truck loadout since the facility only loads diesel fuel into trucks. The source maintains a database of all truck drivers, their tanks, and their leak tightness documentation. The trucks cannot dock on the loading rack without the documentation on file. I observed the monthly leak detection inspection records from January 2022 to June 2024 and deemed them complete. The source conducts leak detection inspections weekly. There have been no leaks that were unable to be addressed within the 15-day timeframe.</p> <p>The source reported in their 2023 1<sup>st</sup> Quarterly report a deviation for failing to record the required monthly leak detection inspection within the timeframe of a month. After realizing the deviation had occurred, the source started recording the monthly leak detection inspections weekly. After looking through their maintenance records and noting the source also conducts leak detection inspections daily, no violations were observed.</p> <p>The source submits their certification that the internal floating roof gasoline storage tanks are equipped with roofs and seals that meet the compliance requirements of 60.112(b)(a)(1) with their semi-annual compliance report and notification of compliance status. These reports have been submitted in a timely manner.</p>			
<i>Emission Unit or Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observation</i>
VRU			Not required when loading diesel fuel
<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:			

<b>ADDITIONAL SOURCE COMPLIANCE REVIEW:</b>
The following reports are required and were reviewed: <input checked="" type="checkbox"/> Annual Compliance Certification(s) <input checked="" type="checkbox"/> Deviation & Compliance Monitoring Report(s)

<b>ADDITIONAL SOURCE COMPLIANCE REVIEW:</b>	
<input type="checkbox"/> Annual Notification(s)	<input checked="" type="checkbox"/> Emission Statement(s)
The reports are consistent with inspection observations.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
The permit accurately represents emission units observed on site.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Compliance assistance was provided during the inspection.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
The source is required to have a Risk Management Plan [40 CFR 68].	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, the source has a plan.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
If yes, the employees have been trained.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
<u>Additional Information and Comments:</u>	
None	
Additional Source Compliance Review 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:	

<b>INSPECTION FINDINGS</b>	
<input checked="" type="checkbox"/> No violations were observed or determined at the time of the inspection. <input type="checkbox"/> The following violations were determined at the time of the inspection:	
<b>RECOMMENDED ACTION</b>	Issue inspection summary letter.
<b>EXIT INTERVIEW</b>	I explained my findings, recommendations, and conclusions with Peters and Ms. Billings prior to exiting the facility.