**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**
*We Protect Hoosiers and Our Environment.*
Northwest Regional Office • 330 W. US Highway 30, Suite F • Valparaiso, IN 46385
(888) 209-8892 • (219) 464-0233 • Fax (219) 464-0553 • www.idem.IN.gov
**Eric J. Holcomb**, *Governor*
**Brian C. Rockensuess**, *Commissioner*

June 26,2024

VIA ELECTRONIC MAIL
Kevin Swartzell
Marathon Pipeline LLC
1900 & 1750 West Avenue H
Griffith, IN. 46319
kmswartzell@marathonpetroleum.com

Re: Inspection Summary Letter
Marathon Pipeline LLC
089-00072
Griffith, Lake County

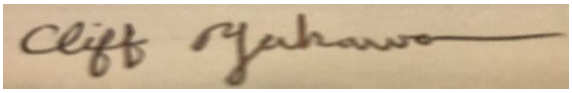
Dear Kevin Swartzell:

On June 25, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Northwest Regional Office (NWRO), conducted an inspection of Marathon Pipeline LLC, located at 1900 & 1750 West Avenue H in Griffith, 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 (219) 250-0350 or by email at mail to: CYukawa@idem.IN.gov.

Sincerely,



Cliff Yukawa, Compliance Inspector
Northwest Regional Office

ACES ID: 298742

ENCLOSURE

cc: Cliff Yukawa, Compliance and Enforcement Branch, NWRO

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

| SOURCE INFORMATION | |
|---|---|
| SOURCE NAME | Marathon Pipeline LLC |
| SOURCE LOCATION | 1900 & 1750 West Avenue H, Griffith, Indiana<br>Lake County County |
| MAILING ADDRESS | 1900 & 1750 West Avenue H, Griffith, IN. 46319 |
| PLANT ID | 089-00072 |
| PERMIT INFORMATION | Permit Type: TVOP<br>Permit Number: 089-42611-00072<br>Permit Expiration Date: 2/18/2026<br>VFC Document No.(hyperlink): 83116326 |
| ATTAINMENT STATUS | ☐ Attainment for all criteria pollutants<br>☒ Nonattainment for ☐$SO_2$ ☐CO ☒$O_3$ ☐$NO_2$ ☐Pb ☐$PM_{10}$ ☐$PM_{2.5}$ |
| SOURCE STATUS | ☒ PSD Major (326 IAC 2-2) ☐ Major Source of HAPs<br>☒ Emission Offset (326 IAC 2-3) ☒ Area Source of HAPs<br>☐ Acid Rain (326 IAC 21) |
| SOURCE DESCRIPTION | The Permittee owns and operates a stationary refined petroleum pipeline terminal. |

| INSPECTION INFORMATION | | | |
|---|---|---|---|
| INSPECTED BY | Cliff Yukawa | | |
| INSPECTION DATE AND TIME | June 25, 2024 | TIME IN: 08:30 | TIME OUT: 12:00 |
| REPORTED BY | Cliff Yukawa | REPORT DATE: June 25, 2022 | |
| COMPLIANCE PERIOD REVIEWED | August 2022 to June 2024 | | |
| INSPECTION NOTIFICATION | ☐ Unannounced | ☒ Announced: Marathon Pipeline LLC Griffith Station is participating in the IDEM Environmental Stewardship Program (ESP) program. A 24-hour advanced notification was provided for this source. | |
| INSPECTION OBJECTIVE(S) | ☒ Compliance Monitoring Strategy (CMS)<br>☐ Mega-Site: ☐ FCE ☐ PCE<br>☐ Other: | ☐ Commitment<br>☐ Complaint<br>☐ Surveillance | |
| ACES TRACKING NUMBER(S) | Inspection: 298742 | Complaint: N/A | Violation/Warning: N/A |
| RM TRACKING NUMBER(S) | Complaint: N/A | | |
| INSPECTION BACKGROUND | Last Compliance Monitoring Strategy (CMS) inspection: 9/1/22, with no violations determined. | | |

| SOURCE PERSONNEL INTERVIEWED | | | |
|---|---|---|---|
| *Name* | *Title* | *Phone Number* | *Email Address* |
| Kevin Swartzell | Coordinator Air Program | (419) 421-3295 | kmswartzell@marathonpetroleum.com |
| Tom Hobson | Area Manager | (219) 688-3332 | tlhobson@marathonpetroleum.com |
| Peter Thomas | HES Professional | (419) 701-9742 | pwthomas@marathonpetroleum.com |

| INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS) | | | |
|---|---|---|---|
| *Date* | *Inspection/Complaint Type* | *Result* | *Comments* |
| 9/1/2022 | CMS | No Violations Noted | |

| COMPLIANCE HISTORY (PREVIOUS 5 YEARS) | | | |
|---|---|---|---|
| **Informal Enforcement Actions** | | | |
| *Date Issued* | *Action Taken* | *Describe Violation(s)* | |
| 4/18/2022 | Violation Letter | During a routine tank-top inspection by Marathon Pipeline LLC for Tank number 217-7, the ladder box well cover was observed to be lifted off the ladder box well for a duration of 16 days. Pursuant to 326 IAC 8-4-3 and condition D.1.1(b)(3)(A) of the Permit, Marathon Pipeline LLC is required for all openings, except stub drains, are equipped with covers, lids, or seals such that to the cover, lid, or seal is in the closed position at all times except when in actual use, which was in violation of 326 IAC 8-4-3 and condition D.1.1(b)(3)(A) of the Permit. | |
| **Formal Enforcement Actions** | | | |
| *Case Number* | *Enforcement Type* | Civil Penalty | Describe Violation(s) |
| 2021-27963-A | EAL (rescinded by IDEM on December 16, 2022) | N/A | The source applied on 2/26/20 to transition from MSOP No. 089-37522-00072 to TVOP No. 089-42611-00072 because of the Lake County nonattainment status change. Permits Branch found that the potential to emit VOC of the source is greater than 100 tons per year. PTE of working and standing losses for storage tanks at the source is 119.62 tons, rather than 72.62 tons as represented in AA No. 089-39770-00072. Permits Branch found that the tank PTE incorrectly relied on a seasonal distribution of gasoline grades Reid's Vapor Pressure (RVP) that was not federally enforceable. Prior to public notice, the source disclosed additional PTE VOC of 58.95 tons from roof landings and tank cleaning that had not been included in previous MSOP permits. The current VOC PTE for the storage tanks is 178.57 tons per year. And the total VOC PTE for this site was calculated at 181.45 tons per year that includes the tank fugitives and natural gas space heaters. The period out of compliance occurred between Permit No. 089-37522-00072 issued on 5/9/2017 when Marathon Pipeline LLC performed a transition from Title V to MSOP and when Marathon Pipeline LLC transitioned back to a Title V Permit 089-42611-00072 issued on 2/18/2021. Marathon Pipeline LLC is in violation of operating without a permit (OWOP) in violation of state rule 326 IAC 2-7-2.<br><br>The U.S. EPA, in the Federal Register Notice 84 FR 44238 dated August 23, 2019, designated Lake County as serious nonattainment for the 2008 8-hour ozone standard effective September 23, 2019. On November 14, 2019, the Environmental Rules Board issued an emergency rule adopting the U.S. EPA's designation. Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean |

| COMPLIANCE HISTORY (PREVIOUS 5 YEARS) | | | |
|---|---|---|---|
| | | | Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NOx emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3.<br>The potential to emit (as defined in 326 IAC 2-7-1(30)) of VOC is equal to or greater than fifty (50) tons per year. Therefore, Marathon Pipeline LLC is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit.<br>Case No. 2021-27963-A (EAL ACES ID: 256854, 256855 dated July 16, 2021) was rescinded by IDEM on December 16, 2022. Based on the review of the information submitted on August 4 and 13, 2021, and other factors, it has been determined that there is credible evidence that the issued Minor Source Operating Permit in effect at the time was appropriate. |
| **Other Relevant Actions** | | | |
| *Action Taken* | *Comments* | | |
| N\A | | | |

| PERMIT SECTION D.1 |
|---|
| Emission Units and Control Devices: |
| (a) Griffith West storage vessels, as follows:<br><br>(1) One (1) organic liquid storage tank, identified as 80-3, constructed in 1958, modified in 2015, with a maximum capacity of 3,064,614 gallons, equipped with geodesic dome, exhausting to vent S1.<br><br>(2) One (1) organic liquid storage tank, identified as 80-5, with a maximum capacity of 3,094,518, gallons equipped with geodesic dome, constructed in 1958, modified in 2015, exhausting to a vent, identified as S7.<br><br>(3) One (1) organic liquid storage tank, identified as 80-9, constructed in 1958, modified in 2015, with a maximum capacity of 3,069,696 gallons, equipped with geodesic dome, exhausting to vent S2.<br><br>(4) One (1) organic liquid storage tank, identified as 80-10, constructed in 1977, with a maximum capacity of 3,259,452 gallons, equipped with an internal floating roof, exhausting to vent S3.<br><br>(5) One (1) organic liquid storage tank, identified as 80-12, constructed in 1959, modified in 2015, with a maximum capacity of 3,058,818 gallons, equipped with geodesic dome, exhausting to vent S4.<br><br>(6) One (1) organic liquid storage tank, identified as 120-4, constructed in 1958 modified in 2015, with a maximum capacity of 4,543,014 gallons, equipped with geodesic dome, exhausting to vent S5.<br><br>(7) One (1) organic liquid storage tank, identified as 120-6, constructed in 1958, modified in 2015, with a maximum capacity of 4,698,792 gallons, equipped with geodesic dome, exhausting to vent S6.<br><br>(8) One (1) organic liquid storage tank, identified as 217-7, constructed in 1958, with a maximum capacity of 8,385,048 gallons, equipped with an internal floating roof, exhausting to vent S8.<br><br>(9) One (1) organic liquid storage tank, identified as 268-8, constructed in 1958, with a maximum capacity of 11,119,164 gallons, equipped with a vertical fixed roof, exhausting to vent S10. |

**PERMIT SECTION D.1**

(10) One (1) organic liquid storage tank, identified as 268-11, constructed in 1978, with a maximum capacity of 10,550,694 gallons, equipped with an internal floating roof, exhausting to vent S9.

(11) One (1) organic liquid storage tank, identified as T-1, constructed in 1958, with a maximum capacity of 158,256 gallons, equipped with an internal floating roof, exhausting to vent S12.

(12) One (1) organic liquid storage tank, identified as T-2, constructed in 1958, with maximum capacity of 149,346 gallons, equipped with an internal floating roof, exhausting to vent S13.

(b) Griffith East storage vessels, as follows:

(1) One (1) organic liquid storage tank, identified as 35-13 (formerly identified as Tank 5404), constructed in 1971, with a maximum capacity of 1,407,756 gallons, equipped with an internal floating roof, exhausting to vent 004.

(2) One (1) organic liquid storage tank, identified as 35-14 (formerly identified as Tank 5405), constructed in 1971, with a maximum capacity of 1,463,574 gallons, equipped with an internal floating roof, exhausting to vent 006.

(3) One (1) organic liquid storage tank, identified as 67-15 (formerly identified as Tank 5403), constructed in 1971, with a maximum capacity of 2,578,548 gallons, equipped with an internal floating roof, exhausting to vent 003.

(4) One (1) organic liquid storage tank, identified as 67-16 (formerly identified as Tank 5402), with a maximum capacity of 2,661,162 gallons, equipped with an internal floating roof, constructed in 1971, exhausting to a vent, identified as Vent 002.

(5) One (1) organic liquid storage tank, identified as 80-17 (formerly identified as Tank 5401), constructed in 1971, with a maximum capacity of 3,232,824 gallons, equipped with an internal floating roof, exhausting to vent 001.

(6) One (1) organic liquid storage tank, identified as T-18 (formerly identified as Tank 5461), constructed in 1971, with a maximum capacity of 112,518 gallons, equipped with an internal floating roof, exhausting to vent 009.

Pollutants with Emission Limits or Applicable Standards:

☐ $SO_2$ ☐ $NO_X$ ☐ CO ☒ VOC ☐ PM ☐ $PM_{10}$ ☐ $PM_{2.5}$ ☐ HAPS

Applicable Rules:

- Petroleum Liquid Storage Facilities [326 IAC 8-4-3]
- IFR Volatile Organic Liquid Storage Vessels [326 IAC 8-9]

| Requirement: | Applicable | Violation Noted |
|---|---|---|
| Emission Limitations and Standards | ☒ Yes ☐ No | ☐ Yes ☒ No |
| Preventive Maintenance Plan | ☒ Yes ☐ No | ☐ Yes ☒ No |
| Compliance Determination Requirements | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Testing Requirements: | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Compliance Monitoring Requirements | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Recordkeeping Requirements | ☒ Yes ☐ No | ☐ Yes ☒ No |

Types of Records Reviewed: (a) Pursuant to 326 IAC 8-4-3(d), for the vessels subject to 326 IAC 8-4-3 listed in the table below:

| Unit | Type | Unit | Type |
|---|---|---|---|
| 80-3 | DEFR | T-1 | IFR |
| 80-5 | DEFR | T-2 | IFR |
| 80-9 | DEFR | 35-13 | IFR |

**PERMIT SECTION D.1**

| | | | |
|---|---|---|---|
| 80-10 | IFR | 35-14 | IFR |
| 80-12 | DEFR | 67-15 | IFR |
| 120-4 | DEFR | 67-16 | IFR |
| 120-6 | DEFR | 80-17 | IFR |
| 268-11 | IFR | T-18 | IFR |

*DEFR - domed external floating roof, considered equivalent to IFR*
*IFR - internal floating roof*

the Permittee shall maintain the following records:

(1) The types of volatile petroleum liquid stored.

(2) The maximum true vapor pressure of the liquid as stored.

(3) The results of the inspections performed on the storage vessels. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

These records shall be maintained for a period of two (2) years, unless otherwise specified. These records shall be made available to the commissioner upon written request.

(b) Pursuant to 326 IAC 8-9-6(a), the Permittee shall keep all records required by 326 IAC 8-9-6 for three (3) years unless specified otherwise. Records required by 326 IAC 8-9-6(b) must be maintained for the life of the vessel.

(c) Pursuant to 326 IAC 8-9-6(b), the Permittee shall maintain a record and submit to the department a report containing the following information for each vessel listed in the emission unit description box.

(1) The vessel identification number.
(2) The vessel dimensions.
(3) The vessel capacity.
(4) A description of the emission control equipment for each vessel described in 326 IAC 8-9-4(a) and (b), or a schedule for installation of emission control equipment on vessels described in 326 IAC 8-9-4(a) and (b) with a certification that the emission control equipment meets the applicable standards

(d) Pursuant to 326 IAC 8-9-6(j), the owner or operator of each vessel storing a waste mixture of indeterminate or variable composition is subject to the following requirements:

(1) Prior to the initial filling of the vessel, the highest maximum true vapor pressure for the range of anticipated liquid compositions to be stored must be determined using the methods described in 326 IAC 8-9-6(i).

(2) For vessels in which the vapor pressure of the anticipated liquid composition is greater than or equal to five-tenths (0.5) psia but less than seventy-five hundredths (0.75) psia, the following tests are required:

**PERMIT SECTION D.1**

(A) An initial physical test of the vapor pressure.

(B) A physical test at least once every six (6) months thereafter using one (1) of the following methods:

(i) ASTM Method D2879-10, Standard Test Method for Vapor Pressure-Temperature Relationship and Initial Decomposition Temperature of Liquids by Isoteniscope.
(ii) ASTM Method D323-08, Standard Test Method for Vapor Pressure of Petroleum Products (Reid Method).
(iii) A reasonably equivalent method approved by the department and U.S. EPA.

| Reporting Requirements | ☐ Yes ☒ No | ☐ Yes ☐ No |
|---|---|---|

Observations and Comments:

On 6/25/2024, I arrived at Marathon Pipeline, LLC at 8:30 am and conducted a visual inspection around the perimeter of the facility. No visual emissions were observed at the time. At 8:40 am, I met with Mr. Swartzell, the coordinator, Air Programs, Marathon Pipelines LLC subsidiary of MPLX LP and we proceeded to meet in the conference room. Mr. Tom Hobson, Area Manager and Mr. Peter Thomas, HES Professional attended the meeting. The documents were available on electronic data sheets and were displayed on a screen in the conference room. I reviewed the Griffith Station Emission and Throughput Summary Table which provided a 12-month rolling average for each tank. Also provided was the maximum true vapor pressure which was converted from the Reeds Vapor Pressure (RVP) values provided. This facility does not have any waste mixtures of material. All vessel identification numbers, dimensions, and capacities were provided for my review. All documents appeared available and accurate. I reviewed the preventive maintenance plan (PMP), effective date 4/28/2021, for the emission units, and it was found to be satisfactory. We took a tour of the Marathon Pipeline, LLC Griffith Station East, and West Tank Fields. Tank numbers 35-13, T-18, T-19, T-20, and T-1 located at the East or West Tank Fields were out of service. There is currently no time schedule to bring these tanks back to service. There were no leaks or odors observed or detected during the drive around inspection. The facility tank dike areas appeared in good, well-manicured condition. Marathon Pipelines, LLC is still a part of the IDEM Environmental Stewardship Program. I left the site at 12:00 pm.

| *Emission Unit or Control Device* | *Parameter* | *Permitted Value/Range* | *Observation* |
|---|---|---|---|
| Internal Floating Roofs for Tanks: 80-10, 217-7, 268-11, T-1, T-2, T-18, 35-13, 35-14, 67-15, 67-16, 80-17. | N/A | N/A | N/A |
| Geodesic Domes for Tanks: 80-3, 80-5, 80-9, 80-12, 120-4, 120-6 | N/A | N/A | N/A |
| Vertical Fixed Roofs for Tanks: 107, 268-8 | N/A | N/A | N/A |

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 D.2**

Emission Units and Control Devices:

(a) Combustion related activities, as follows:

(1) Space heaters, process heaters, heat treat furnaces, or boilers using the following fuels:

(A) Natural gas-fired combustion sources with heat input equal to or less than ten million

**PERMIT SECTION D.2**

(10,000,000) British thermal units per hour, as follows:

(i) One (1) natural-gas fired space heater, identified as F-3, permitted in 2017, with a heat input capacity of 0.40 MMbtu/hr.

(B) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) British thermal units per hour and firing fuel containing equal to or less than five-tenths percent (0.5%) sulfur by weight, as follows:

(i) One (1) fuel oil-fired space heater, identified as H-1, permitted in 2017, with a heat input capacity of 0.11 MMBtu/hr.

Pollutants with Emission Limits or Applicable Standards:

☐ $SO_2$ ☐ $NO_X$ ☐ CO ☐ VOC ☒ PM ☐ $PM_{10}$ ☐ $PM_{2.5}$ ☐ HAPS

Applicable Rules:

- Particulate Emissions [326 IAC 6-2-4]

| Requirement: | Applicable | Violation Noted |
|---|---|---|
| Emission Limitations and Standards | ☒ Yes ☐ No | ☐ Yes ☒ No |
| Preventive Maintenance Plan | ☒ Yes ☐ No | ☐ Yes ☒ No |
| Compliance Determination Requirements | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Testing Requirements: | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Compliance Monitoring Requirements | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Recordkeeping Requirements | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Types of Records Reviewed: N/A | | |
| Reporting Requirements | ☐ Yes ☒ No | ☐ Yes ☒ No |

Observations and Comments:

At the time of the inspection, natural gas space heaters associated with this section of the company's permit were not in operation. These space heaters operate in the winter months. The one (1) fuel oil-fired space heater identified as H-1 in section D.2 and permitted in 2017, has been removed from the site. Space heaters are used during the colder months inside the maintenance buildings. I reviewed the PMP for the emission units, and it was found to be satisfactory.

| *Emission Unit or Control Device* | *Parameter* | *Permitted Value/Range* | *Observation* |
|---|---|---|---|
| N\A | | | |

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.1 NSPS**

Emission Units and Control Devices:

(a) Griffith West storage vessels, as follows:

(4) One (1) organic liquid storage tank, identified as 80-10, constructed in 1977, with a maximum capacity of 3,259,452 gallons, equipped with an internal floating roof, exhausting to vent S3.

(10) One (1) organic liquid storage tank, identified as 268-11, constructed in 1978, with a maximum capacity of 10,550,694 gallons, equipped with an internal floating roof, exhausting to vent S9.

**PERMIT SECTION E.1 NSPS**

Pollutants with Emission Limits or Applicable Standards:

☐ $SO_2$ ☐ $NO_X$ ☐ CO ☒ VOC ☐ PM ☐ $PM_{10}$ ☐ $PM_{2.5}$ ☒ HAPS

Applicable Rule:

General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A] Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978, NSPS [326 IAC 12] [40 CFR Part 60, Subpart K].

Applicability Information:

40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 60, Subpart K.

| Requirement: | Applicable | Violation Noted |
|---|---|---|
| Emission Limitations/Standards | ☒ Yes ☐ No | ☐ Yes ☒ No |
| Work Practice/Operating Requirements | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Compliance Monitoring Requirements | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Testing Requirements: | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Record Keeping Requirements | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Types of Records Reviewed: N/A | | |
| Reporting Requirements | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Preventive Maintenance Plan | ☐ Yes ☒ No | ☐ Yes ☒ No |

Observations and Comments:

The New Source Performance Standards (NSPS) are applicable to tanks 80-10 and 268-11 noted in this section of the company's permit. The affected facility to which this subpart applies has storage vessels for petroleum liquids that have a storage greater than 151,412 liters (40,000 gallons) which were constructed after June 11, 1973, and prior to May 19, 1978. Tank number 80-10 will be taken out of service on December 31, 2024, for an indefinite amount of time awaiting future orders for this product type. Tank 268-11 was in service and appeared in good condition. There were no leaks or odors observed or detected during the inspection. See section D.1 regarding the inspection of the Volatile Organic Liquid (VOL) storage tanks.

| *Emission Unit or Control Device* | *Parameter* | *Permitted Value/Range* | *Observation* |
|---|---|---|---|
| Internal Floating Roofs for Tanks: 80-10 and 268-11 | N/A | N/A | N/A |

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.2 NESHAP**

Emission Units and Control Devices:

(a) Griffith West storage vessels, as follows:

(1) One (1) organic liquid storage tank, identified as 80-3, constructed in 1958, modified in 2015, with a maximum capacity of 3,064,614 gallons, equipped with geodesic dome, exhausting to vent S1.

(2) One (1) organic liquid storage tank, identified as 80-5, with a maximum capacity of 3,094,518, gallons equipped with geodesic dome, constructed in 1958, modified in 2015, exhausting to a vent, identified as S7.

(3) One (1) organic liquid storage tank, identified as 80-9, constructed in 1958, modified in 2015, with a maximum capacity of 3,069,696 gallons, equipped with geodesic dome, exhausting to vent S2.

**PERMIT SECTION E.2 NESHAP**

(4) One (1) organic liquid storage tank, identified as 80-10, constructed in 1977, with a maximum capacity of 3,259,452 gallons, equipped with an internal floating roof, exhausting to vent S3.

(5) One (1) organic liquid storage tank, identified as 80-12, constructed in 1959, modified in 2015, with a maximum capacity of 3,058,818 gallons, equipped with geodesic dome, exhausting to vent S4.

(6) One (1) organic liquid storage tank, identified as 120-4, constructed in 1958 modified in 2015, with a maximum capacity of 4,543,014 gallons, equipped with geodesic dome, exhausting to vent S5.

(7) One (1) organic liquid storage tank, identified as 120-6, constructed in 1958, modified in 2015, with a maximum capacity of 4,698,792 gallons, equipped with geodesic dome, exhausting to vent S6.

(8) One (1) organic liquid storage tank, identified as 217-7, constructed in 1958, with a maximum capacity of 8,385,048 gallons, equipped with an internal floating roof, exhausting to vent S8.

(9) One (1) organic liquid storage tank, identified as 268-8, constructed in 1958, with a maximum capacity of 11,119,164 gallons, equipped with a vertical fixed roof, exhausting to vent S10.

(10) One (1) organic liquid storage tank, identified as 268-11, was constructed in 1978, with a maximum capacity of 10,550,694 gallons, equipped with an internal floating roof, exhausting to vent S9.

(11) One (1) organic liquid storage tank, identified as T-1, constructed in 1958, with a maximum capacity of 158,256 gallons, equipped with an internal floating roof, exhausting to vent S12.

(12) One (1) organic liquid storage tank, identified as T-2, constructed in 1958, with maximum capacity of 149,346 gallons, equipped with an internal floating roof, exhausting to vent S13.

(b) Griffith East storage vessels, as follows:

(1) One (1) organic liquid storage tank, identified as 35-13 (formerly identified as Tank 5404), constructed in 1971, with a maximum capacity of 1,407,756 gallons, equipped with an internal floating roof, exhausting to vent 004.

(2) One (1) organic liquid storage tank, identified as 35-14 (formerly identified as Tank 5405), constructed in 1971, with a maximum capacity of 1,463,574 gallons, equipped with an internal floating roof, exhausting to vent 006.

(3) One (1) organic liquid storage tank, identified as 67-15 (formerly identified as Tank 5403), constructed in 1971, with a maximum capacity of 2,578,548 gallons, equipped with an internal floating roof, exhausting to vent 003.

(4) One (1) organic liquid storage tank, identified as 67-16 (formerly identified as Tank 5402), with a maximum capacity of 2,661,162 gallons, equipped with an internal floating roof, constructed in 1971, exhausting to a vent, identified as Vent 002.

(5) One (1) organic liquid storage tank, identified as 80-17 (formerly identified as Tank 5401), constructed in 1971, with a maximum capacity of 3,232,824 gallons, equipped with an internal floating roof, exhausting to vent 001.

(6) One (1) organic liquid storage tank, identified as T-18 (formerly identified as Tank 5461), constructed in 1971, with a maximum capacity of 112,518 gallons, equipped with an internal floating roof, exhausting to vent 009.

**Insignificant Activities:**

(d) An emission unit or activity whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1) or the exemption levels specified in the following, whichever is lower:

**PERMIT SECTION E.2 NESHAP**

- For lead or lead compounds measured as elemental lead, the exemption level is six-tenths (0.6) ton per year or three and twenty-nine hundredths (3.29) pounds per day.
- For carbon monoxide (CO), the exemption limit is twenty-five (25) pounds per day.
- For sulfur dioxide, the exemption level is five (5) pounds per hour or twenty-five (25) pounds per day.
- For VOC, the exemption limit is three (3) pounds per hour or fifteen (15) pounds per day.
- For nitrogen oxides (NOx), the exemption limit is five (5) pounds per hour or twenty-five (25) pounds per day.
- For $PM_{10}$ or direct $PM_{2.5}$, the exemption level is either five (5) pounds per hour or twenty-five (25) pounds per day.

As follows:

(1) Fugitive emissions from equipment leaks in the petroleum pipeline breakout station.

Pollutants with Emission Limits or Applicable Standards:

☐ $SO_2$ ☐ $NO_X$ ☐ CO ☒ VOC ☐ PM ☐ $PM_{10}$ ☐ $PM_{2.5}$ ☒ HAPS

Applicable Rule:

General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]
National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities NESHAP [40 CFR Part 63, Subpart BBBBBB]

Applicability Information:

40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart BBBBBB.

| Requirement: | Applicable | Violation Noted |
|---|---|---|
| Emission Limitations/Standards | ☒ Yes ☐ No | ☐ Yes ☒ No |
| Work Practice/Operating Requirements | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Compliance Monitoring Requirements | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Testing Requirements: | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Record Keeping Requirements | ☒ Yes ☐ No | ☐ Yes ☒ No |
| Types of Records Reviewed: Monthly leak detection logs, tank inspection records, notifications of compliance status, semiannual compliance reports. | | |
| Reporting Requirements | ☒ Yes ☐ No | ☐ Yes ☒ No |
| Preventive Maintenance Plan [326 IAC 1-6-3] | ☐ Yes ☒ No | ☐ Yes ☒ No |

Observations and Comments:

The National Emission Standards for Hazardous Air Pollutants (NESHAP) is applicable to the following tanks: Vertical Fixed Roofs for Tanks: 107, 268-8, Geodesic Domes for Tanks: 80-3, 80-5, 80-9, 80-12, 120-4, 120-6, and Internal Floating Roofs for Tanks: 80-10, 217-7, 268-11, T-1, T-2, T-18, 35-13, 35-14, 67-15, 67-16, 80-17. The affected facility to which this subpart BBBBBB applies is each storage vessel with a capacity greater than or equal to seventy-five (75) cubic meters ($M^3$) that is used to store VOL for which construction, reconstruction, or modification is commenced after July 23, 1984. See section D.1 regarding the inspection of the VOL Storage tanks.

| *Emission Unit or Control Device* | *Parameter* | *Permitted Value/Range* | *Observation* |
|---|---|---|---|
| Internal Floating Roofs for Tanks: 80-10, 217-7, 268-11, T-1, T-2, T-18, 35-13, 35-14, 67-15, 67-16, 80-17. | N/A | N/A | N/A |
| Geodesic Domes for Tanks: 80-3, 80-5, 80-9, 80-12, 120-4, 120-6 | N/A | N/A | N/A |
| Vertical Fixed Roofs for Tanks: 107, 268-8 | N/A | N/A | N/A |

Permit Section Compliance Status:

| PERMIT SECTION E.2 NESHAP |
|---|
| ☒ No violations were observed or determined for this permit section at the time of the inspection.<br>☐ The following violations were determined for this permit section at the time of the inspection: |

| ADDITIONAL SOURCE COMPLIANCE REVIEW: | |
|---|---|
| The following reports are required and were reviewed:<br>☒ Annual Compliance Certification(s) ☒ Deviation & Compliance Monitoring Report(s)<br>☐ 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 one (1) fuel oil-fired space heater identified as H-1 in section D.2 has been removed from the site. This will be addressed in the next permit modification and or renewal. | |
| Additional Source Compliance Review Status: | |
| ☒ No violations were observed or determined for this permit section at the time of the inspection.<br>☐ The following violations were determined for this permit section at the time of the inspection: | |

| INSPECTION FINDINGS | |
|---|---|
| ☒ No violations were observed or determined at the time of the inspection.<br>☐ The following violations were determined at the time of the inspection: | |
| RECOMMENDED ACTION | Issue inspection summary letter. |
| EXIT INTERVIEW | I explained my findings, recommendations, and conclusions with Mr. Swartzell, Mr. Hobson, and Mr. Thomas prior to exiting the facility. |

| ATTACHMENTS |
|---|
| • None. |