City of Indianapolis
Bart Peterson, Mayor

TO: Interested Parties / Applicant

RE: Superior Oil Company, Inc. / **FESOP F097-18042-00286**

FROM: Felicia A. Robinson
Manager of Environmental Planning, OES

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Indiana Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit revision is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within fifteen (15) calendar days from the receipt of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Indianapolis Office of Environmental Services, Air Permits at (317) 327-2280 or (317) 327-2176.

Enclosures

Department of Public Works
Office of Environmental Services
2700 South Belmont Avenue (317) 327-2234
Indianapolis, Indiana 46221 (fax) 327-2274
www.indygov.org **TDD) 325-5186**

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

City of Indianapolis
Bart Peterson, Mayor

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

Superior Oil Company, Inc.
400 West Regent Street
Indianapolis, Indiana 46225

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. 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. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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 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.: F097-18042-00286	
Issued by: Original signed by: Felicia A. Robinson, Manager of Environmental Planning	Issuance Date: April 28, 2005 Expiration Date: April 28, 2010

Department of Public Works
Office of Environmental Services
2700 South Belmont Avenue (317) 327-2234
Indianapolis, Indiana 46221 (fax) 327-2274
(TDD) 325-5186
www.indygov.org

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary source, operation of distribution of industrial chemicals and related materials, including blending, container filling and other packaging activities.

Authorized individual:	Vice President, Operations
Source Address:	400 West Regent Street, Indianapolis, Indiana 46225
Mailing Address:	400 West Regent Street, Indianapolis, Indiana 46225
General Source Phone:	(317) 781-4400
SIC Code:	5169, 2899
Source Location Status:	Marion County Nonattainment for ozone under the 8-hour standard Nonattainment for PM2.5 Attainment for all other criteria pollutants.
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, Section 112 of the Clean Air Act Minor Source, under PSD or Emission Offset Rules Not 1 of 28 Source Categories

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) Loading Rack for receiving and shipping chemicals and solvents (via rail car or tank truck and containerized), with maximum capacity of 65,700,000 gallons per year of bulk or containerized receipts.

(b) Blending operation, consisting of pumps, hoses, and blend tanks, used for making custom solvent blends, with maximum capacity of 39,420,000 gallons per year. Finished blends are packaged directly from the blend tanks or transferred to storage tanks.

(c) Compounding Operations, consisting of mix, blend, and storage tanks, used for the compounding of water based cleaners with low VOC type additives, with maximum capacity of 39,420,000 gallons per year. Finished blends are packaged directly from the mix tanks or transferred to storage tanks.

(d) Container Filling Operations, with maximum capacity of 39,420,000 gallons per year. Containers (drums, pails, and totes) are filled from other containers, blend tanks or bulk storage tanks prior to shipment with straight products and blends.

(e) Special Processing Unit, identified as TEA1, with maximum processing capacity of 18,980,000 gallons per year of spent scrubber solutions from foundries air pollution control devices, exhausting to Stack ID TEA1, constructed in 1996. Specification amine products are filled into containers for distribution. Amines (primarily TEA) emissions and odors are controlled by a liquid scrubber unit, identified as TEA Scrubber System, consisting of series of drums and a plastic tote that contain the acid and water mixture.

(f) The following tanks with over 1 ton per year HAP potential:

Tank 2, fixed roof tank with a storage capacity of 25,000 gallons, constructed in 1995.
Tank 8, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1974.
Tank 9, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1974.
Tank 10, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1974.
Tank 11, fixed roof tank with a storage capacity of 20,000 gallons, constructed in 1973.
Tank 12, fixed roof tank with a storage capacity of 20,000 gallons, constructed in 1973.
Tank 13, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 14, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 15, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 16, fixed roof tank with a storage capacity of 20,000 gallons, constructed in 1973.
Tank 17, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1974.
Tank 18, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1972.
Tank 19, fixed roof tank with a storage capacity of 20,000 gallons, constructed in 1973.
Tank 20, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 21, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 22, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 23, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 24, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 25, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1981.
Tank 26, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 27, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 28, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 29, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 41, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1972.
Tank 42, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1973.
Tank 43, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1973.
Tank 44, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1973.
Tank 45, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1973.
Tank 46, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1972.
Tank 47, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1972.
Tank 48, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1973.
Tank 49, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1973.
Tank 50, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 51, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1979.
Tank 52, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1979.
Tank 53, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1979.
Tank 55, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 56, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1981.
Tank 57, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1979.
Tank 58, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1981.
Tank 59, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1981.
Tank 80, fixed roof tank with a storage capacity of 20,000 gallons, constructed in 1979.
Tank 81, fixed roof tank with a storage capacity of 20,000 gallons, constructed in 1979.

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

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

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

(a) Tank 1, fixed roof tank with a storage capacity of 7,000 gallons, constructed in 1974.
Tank 3, fixed roof tank with a storage capacity of 7,000 gallons, constructed in 1974.
Tank 4, fixed roof tank with a storage capacity of 7,000 gallons, constructed in 1980.
Tank 5, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1974.
Tank 6, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1974.
Tank 7, fixed roof tank with a storage capacity of 7,000 gallons, constructed in 1974.
Tank 13, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 14, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.

Tank 15, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 20, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 21, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 22, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 23, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 24, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 26, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 27, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 28, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 29, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 30, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1974.
Tank 31, fixed roof tank with a storage capacity of 7,000 gallons, constructed in 1974.
Tank 32, fixed roof tank with a storage capacity of 7,000 gallons, constructed in 1974.
Tank 32, fixed roof tank with a storage capacity of 7,000 gallons, constructed in 1974.
Tank 33, fixed roof tank with a storage capacity of 7,000 gallons, constructed in 1974.
Tank 34, fixed roof tank with a storage capacity of 7,000 gallons, constructed in 1974.
Tank 35, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1974.
Tank 36, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1974.
Tank 37, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1974.
Tank 38, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1974.
Tank 39, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1974.
Tank 40, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1974.
Tank 50, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 54, fixed roof tank with a storage capacity of 7,000 gallons, constructed in 1980.
Tank 55, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 60, fixed roof tank with a storage capacity of 6,000 gallons, constructed in 1994.
Tank 61, fixed roof tank with a storage capacity of 6,000 gallons, constructed in 1990.
Tank 62, fixed roof tank with a storage capacity of 6,000 gallons, constructed in 1982.
Tank 63, fixed roof tank with a storage capacity of 3,000 gallons, constructed in 1995.
Tank 64, fixed roof tank with a storage capacity of 3,000 gallons, constructed in 1995.
Tank 65, fixed roof tank with a storage capacity of 3,000 gallons, constructed in 1995.
Tank 66, fixed roof tank with a storage capacity of 6,000 gallons, constructed in 1982.
Tank 67, fixed roof tank with a storage capacity of 3,000 gallons, constructed in 1984.
Tank 68, fixed roof tank with a storage capacity of 6,000 gallons, constructed in 1984.
Tank 69, fixed roof tank with a storage capacity of 6,000 gallons, constructed in 1984.
Tank 70, fixed roof tank with a storage capacity of 3,000 gallons, constructed in 1990.
Tank 71, fixed roof tank with a storage capacity of 1,500 gallons, constructed in 1990.
Tank 72, fixed roof tank with a storage capacity of 1,500 gallons, constructed in 1990.
Tank 73, fixed roof tank with a storage capacity of 3,000 gallons, constructed in 1990.
Tank B1, fixed roof tank with a storage capacity of 2,000 gallons, constructed in 1973.
Tank B2, fixed roof tank with a storage capacity of 6,000 gallons, constructed in 1973.
Tank B3, fixed roof tank with a storage capacity of 3,000 gallons, constructed in 1990.
Tank B4, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1990.
Tank B5, fixed roof tank with a storage capacity of 1,100 gallons, constructed in 1994. ,
Tank B6 fixed roof tank with a storage capacity of 1,000 gallons, constructed in 1994.
Tank B7, fixed roof tank with a storage capacity of 1,000 gallons, constructed in 1994.
Tank B8, fixed roof tank with a storage capacity of 1,100 gallons, constructed in 1994.
Tank B9, fixed roof tank with a storage capacity of 675 gallons, constructed in 1992.

(b) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour – hot oil heater, identified as HO1, 8.5 MMBtu/hr.

(c) Combustion source flame safety purging on startup.

(d) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (Trichloroethylene degreaser, identified as D-1, with a maximum throughput of 120 gallons per 12 months).

(f) Cleaners and solvents characterized as follows:

(1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100^{o}F) or;

(2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20^{o}C (68^{o}F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(g) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.

(h) Closed loop heating and cooling systems.

(i) Structural steel and bridge fabricating activities using 80 tons or less of welding consumables.

(j) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(k) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(l) Noncontact cooling tower systems with forced and induced draft cooling tower system not regulated under NESHAP.

(m) Heat exchanger cleaning and repair.

(n) Process vessel degassing and cleaning to prepare for internal repairs.

(o) Paved and unpaved roads and parking lots with public access.

(p) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(q) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(r) Blowdown for any of the following: sight glass; boiler; compressors; pumps, and cooling tower.

(s) On-site fire and emergency response training approved by the department.

(t) Purge double block and bleed valves.

(u) Filter or coalescer media changeout.

(w) A laboratory as defined in 326 IAC 2-7-1(20)(C).

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 Quality (OAQ), and OES for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [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, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

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

(a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

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 Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and OES 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. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, and OES copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, and OES, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ and OES 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 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification 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, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications 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 Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

(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, OAQ, and OES on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate 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, OAQ, and OES 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 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 (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 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, OAQ, and OES, 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 IDEM, OAQ, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for IDEM, OAQ, Compliance Section)
Facsimile No.: 317-233-5967

and

Telephone No.: 317-327-2234 (ask for OES Air Compliance Section)
Facsimile No.: 317-327-2274

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, and OES 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, OAQ, and OES, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance 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.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 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 Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 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)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if OES 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 OES 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 OES at least thirty (30) days in advance of the date this permit is to be reopened, except that OES may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 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, OAQ and OES 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) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

(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, OAQ, and OES on or before the date it is due.

(2) If IDEM, OAQ, and OES 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, OAQ, and OES 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, OAQ, and OES, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(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 2-8-11.1 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 Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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, OAQ, and OES, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) 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).

(c) 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, OAQ, or U.S. EPA is required.

(d) 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.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, OES, 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) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(1) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(2) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 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, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(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 twelve (12) consecutive month 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 twelve (12) consecutive month 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.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 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.

C.5 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.6 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).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

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

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

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) 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 Quality
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services
Asbestos Section
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable 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) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) 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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

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

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ, and OES.

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 Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ, and OES of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and OES, if the Permittee submits to IDEM, OAQ, and OES a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification that shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ("2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ("2%) of full scale reading.

(c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.

(d) The Permittee may request the IDEM, OAQ, and OES approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

within ninety (90) days from the date of issuance of this permit.

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(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 response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, and OES within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(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, OAQ, and OES that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ, and OES may extend the retesting deadline.

(c) IDEM, OAQ, and OES reserve the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)(c)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the OES Administrator within a reasonable time.

(b) Unless otherwise specified in this permit, 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)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(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 Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

(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, OAQ, and OES on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) The first report shall cover the period commencing on the date of issuance of the original FESOP and ending on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

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

Facility Description [326 IAC 2-8-4(10)]:

(a) Loading Rack for receiving and shipping chemicals and solvents (via rail car or tank truck and containerized), with maximum capacity of 65,700,000 gallons per year of bulk or containerized receipts.

(b) Blending operation, consisting of pumps, hoses, and blend tanks, used for making custom solvent blends, with maximum capacity of 39,420,000 gallons per year. Finished blends are packaged directly from the blend tanks or transferred to storage tanks.

(c) Compounding Operations, consisting of mix, blend, and storage tanks, used for the compounding of water based cleaners with low VOC type additives, with maximum capacity of 39,420,000 gallons per year. Finished blends are packaged directly from the mix tanks or transferred to storage tanks.

(d) Container Filling Operations, with maximum capacity of 39,420,000 gallons per year. Containers (drums, pails, and totes) are filled from other containers, blend tanks or bulk storage tanks prior to shipment with straight products and blends.

(e) Special Processing Unit, identified as TEA1, with maximum processing capacity of 18,980,000 gallons per year of spent scrubber solutions from foundries air pollution control devices, exhausting to Stack ID TEA1, constructed in 1996. Specification amine products are filled into containers for distribution. Amines (primarily TEA) emissions and odors are controlled by a liquid scrubber unit, identified as TEA Scrubber System, consisting of series of drums and a plastic tote that contain the acid and water mixture.

(f) The following tanks with over 1 ton per year HAP potential:

Tank 2, fixed roof tank with a storage capacity of 25,000 gallons, constructed in 1995.
Tank 8, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1974.
Tank 9, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1974.
Tank 10, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1974.
Tank 11, fixed roof tank with a storage capacity of 20,000 gallons, constructed in 1973.
Tank 12, fixed roof tank with a storage capacity of 20,000 gallons, constructed in 1973.
Tank 16, fixed roof tank with a storage capacity of 20,000 gallons, constructed in 1973.
Tank 17, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1974.
Tank 18, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1972.
Tank 19, fixed roof tank with a storage capacity of 20,000 gallons, constructed in 1973.
Tank 25, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1981.
Tank 41, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1972.
Tank 42, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1973.
Tank 43, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1973.
Tank 44, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1973.
Tank 45, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1973.
Tank 46, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1972.
Tank 47, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1972.
Tank 48, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1973.
Tank 49, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1973.
Tank 51, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1979.
Tank 52, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1979.
Tank 53, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1979.
Tank 56, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1981.
Tank 57, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1979.
Tank 58, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1981.
Tank 59, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1981.

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4(1)] [326 IAC 2-3]

Pursuant to 326 IAC 2-8-4(1), the Permittee shall limit the VOC emissions to less than 100 tons per twelve (12) consecutive month period, such that the requirements of the Part 70 Operating Permit, Regulation 326 IAC 2-7, and 326 IAC 2-3 (Emission Offset) shall not apply.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The Permittee shall limit the VOC emissions from the Special Processing Unit, identified as TEA1, to less than 25 tons per twelve (12) consecutive month period, such that the requirements of the 326 IAC 8-1-6 (New facilities; general reduction requirements) shall not apply.

D.1.3 Hazardous Air Pollutants (HAP) [326 IAC 2-8-4(1)]

Pursuant to 326 IAC 2-8-4(1), the Permittee shall limit the emissions of any single HAP to less than 10 tons per twelve (12) consecutive month period and the emissions of any combination of HAPs to less than 25 tons per twelve (12) consecutive month period such that the requirements of the Part 70 Operating Permit Program 326 IAC 2-7 shall not apply.

D.1.4 Volatile Organic Storage Vessels [40 CFR 60, Subpart Kb] [326 IAC 12-1]

Pursuant to 40 CFR 60, Subpart Kb, the owner or operator of the affected storage vessel, identified as Tank 2, shall comply with requirements of 40 CFR 60.116(a) and (b).

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 Special Processing Unit, identified as TEA1.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]

(a) The Permittee shall use a computer-based operating system Chempax to track material usage, accounting information and customer data. This system shall provide detailed data regarding transactions for the purposes of supporting environmental reporting. The Chempax system shall provide reports for any range of calendar days, and reports generated by Chempax shall contain the following information:

(1) For bulk transfers: date, receipt number, product name, amount in pounds, specific gravity, input location, and output location.

(2) For container filling transfers: date, receipt number, product name, composition (amount of VOC and HAPs), amount in pounds, specific gravity, time of transfer, duration of transfer, and type of transfer (bulk to container, container to container, or blend in container).

(3) For blending tank operations: date, receipt number, product name, amount in pounds, specific gravity, time of blend, duration of blend.

(b) The Chempax system data shall be used to determine the material throughput for each tank as input into the TANKS program for each of the permitted tanks. Each bulk storage tank shall have a unique identifier to make possible to determine what materials go into and out of each bulk storage tank.

(c) The Chempax data output shall be available in Excel spreadsheets format, where molecular weight and vapor pressure shall be added for each material, and VOC and HAPs (individual and combined) emissions shall be calculated.

(d) VOC and HAP emissions calculations shall be performed for the following equipment and operations:

(1) Loading rack;

(2) Container Filling and Blending operations, and

(3) Tanks Storage.

(e) VOC emission factors for emissions generated by Loading rack, Container filling, Blending operations, and Special Processing Unit TEA1 Containerizing of materials shall be calculated using the following formula (AP-42, section 4.4):

E= 12.46*S*P*M/T, where:

E = pounds of emissions per 1000 gallons loaded;
S= saturation factor (1.45 for splash loading and 0.5 for submerged fill);
P = vapor pressure (psia);
M = mol. wt (lb/lb mole);
T = Temp (R).

(f) VOC Emissions from mixing operations shall be calculated using the following formula (EIIP, Vol. 2, Ch. 8):

E = M * Kx * A * P * 3600 * H/ (R*T), where:

E = emission in pounds
T = Temp (Rankine) = 530
M = Mol. Wt (lb/lb-mole)
P = Vapor pressure (psia)
A = Area of tank (average 29 sf)
H = batch time (hrs)
Kx = gas phase mass transfer coeff.
Kx = 0.00438* (U^0.78)(18/M)^1/3
U = wind speed = 0.1 mph
R = Universal gas constant = 10.73

(g) For the purpose of HAPs emission calculations, 100% of HAP content in solvents shall be accounted for as HAP emission.

(h) Storage Tanks emissions shall be calculated using EPA's TANKS program (4.0 or more current version).

(i) In the event that the Chempax system should be unavailable, paper records providing the same data shall be used and kept to provide data for the purposes of emissions calculations and compliance determination.

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

D.1.7 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2, D.1.3, the Permittee shall keep records of chemicals inventory and throughput for each transfer and storage operation (input and output data of Chempax system and TANKS program). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period and shall include, but not limited to:

(1) the number of gallons of each solvent;

(2) the molecular weight of each solvent;

(3) the vapor pressure of each solvent;

(4) the composition of each solvent (VOC and HAPs content);

(5) the type of operation used for each solvent (e.g., container filling or mixing or loading rack);

(6) the date of the transfer.

(b) To document compliance with Condition D.1.4, the permittee shall keep all records required in 40 CFR 60.116 (a) & (b) for Storage Tank 2 for the life of the tank.

(c) To document compliance with Condition D.1.5, the Permittee shall maintain a log of inspections prescribed by the Preventive Maintenance Plan.

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

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2, and D.1.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:
Insignificant Activities:

(a) Natural gas-fired Hot Oil Heater, identified as HO1, 8.3 MMBtu/hr.

(b) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6.

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.

(d) Structural steel and bridge fabricating activities using 80 tons or less of welding consumables.

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

D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Particulate Emissions from the natural gas fired 8.3 MMBtu per hour Hot Oil Heater, Emission Unit ID HO1, shall be limited to less than 0.6 pounds per million Btu of heat input.

D.2.2 Particulate emission limitations, work practices, and control technologies [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c), which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply, shall not exceed 0.551 pounds per hour.

D.2.3 Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$);

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure that does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five-hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Superior Oil Company, Inc.
Source Address: 400 West Regent Street, Indianapolis, Indiana 46225
Mailing Address: 400 West Regent Street, Indianapolis, Indiana 46225
FESOP No.: 097-18042-00286

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:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ 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 QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967
and

INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2209

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Superior Oil Company, Inc.
Source Address: 400 West Regent Street, Indianapolis, Indiana 46225
Mailing Address: 400 West Regent Street, Indianapolis, Indiana 46225
FESOP No.: 097-18042-00286

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE

FESOP Quarterly Report

Source Name: Superior Oil Company, Inc.
Source Address: 400 West Regent Street, Indianapolis, Indiana 46225
Mailing Address: 400 West Regent Street, Indianapolis, Indiana 46225
FESOP No.: 097-18042-00286
Facility: Bulk Chemical Blending, Packaging, Storage, and Distribution Operation
Parameter: Volatile Organic Compound Emissions
Limit: less than 100 tons of VOC per twelve consecutive month period, rolled monthly

YEAR:_____

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE

FESOP Quarterly Report

Source Name: Superior Oil Company, Inc.
Source Address: 400 West Regent Street, Indianapolis, Indiana 46225
Mailing Address: 400 West Regent Street, Indianapolis, Indiana 46225
FESOP No.: 097-18042-00286
Facility: Bulk Chemical Blending, Packaging, Storage, and Distribution Operation
Parameter: HAP Emissions
Limit: less than 10 tons of an individual HAP per twelve consecutive month period, rolled monthly.

YEAR: _____

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

No deviation occurred in this quarter.

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 QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE

FESOP Quarterly Report

Source Name: Superior Oil Company, Inc.
Source Address: 400 West Regent Street, Indianapolis, Indiana 46225
Mailing Address: 400 West Regent Street, Indianapolis, Indiana 46225
FESOP No.: 097-18042-00286
Facility: Bulk Chemical Blending, Packaging, Storage, and Distribution Operation
Parameter: Hazardous Air Pollutant Emissions
Limit: less than 25 tons of any combination of HAPs per twelve consecutive month period, rolled monthly.

YEAR: _____

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

No deviation occurred in this quarter.

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 QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE

FESOP Quarterly Report

Source Name: Superior Oil Company, Inc.
Source Address: 400 West Regent Street, Indianapolis, Indiana 46225
Mailing Address: 400 West Regent Street, Indianapolis, Indiana 46225
FESOP No.: 097-18042-00286
Facility: Special Processing Unite, identified as TEA1
Parameter: Volatile Organic Compound Emissions
Limit: less than 25 tons of VOC per twelve consecutive month period, rolled monthly

YEAR:_____

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

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

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Superior Oil Company, Inc.
Source Address: 400 West Regent Street, Indianapolis, Indiana 46225
Mailing Address: 400 West Regent Street, Indianapolis, Indiana 46225
FESOP No.: 097-18042-00286

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	**Superior Oil Company, Inc.**
Source Location:	**400 West Regent Street, Indianapolis Indiana 46225**
County:	**Marion**
SIC Code:	**5169, 2899**
Operation Permit No.:	**F097-18042-00286**
Permit Reviewer:	**B. Gorlin**

The Indianapolis Office of Environmental Services (OES) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Superior Oil Company, Inc., relating to the operation of distribution of industrial chemicals and related materials, including blending, container filling, and other packaging activities. On October 3, 2003, the source applied for a transition from Part 70 Permit to FESOP, based on actual annual emissions below the FESOP thresholds.

Permitted Emission Units and Pollution Control Equipment

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

(a) Loading Rack for receiving and shipping chemicals and solvents (via rail car or tank truck and containerized), with maximum capacity of 10,000,000 gallons per year of bulk receipts, and 6,000,000 gallons per year of containerized receipts.

(b) Blending operation, consisting of pumps, hoses, and blend tanks, used for making custom solvent blends, with maximum capacity of 800,000 gallons per year. Finished blends are packaged directly from the blend tanks or transferred to storage tanks.

(c) Compounding Operations, consisting of mix, blend, and storage tanks, used for the compounding of water based cleaners with low VOC type additives, with maximum capacity of 450,000 gallons per year. Finished blends are packaged directly from the mix tanks or transferred to storage tanks.

(d) Container Filling Operations, with maximum capacity of 3,000,000 gallons per year. Containers (drums, pails, and totes) are filled from other containers, blend tanks or bulk storage tanks prior to shipment with straight products and blends.

(e) Special Processing Unit, identified as TEA1, with maximum processing capacity of 500,000 gallons per year of spent scrubber solutions from foundries air pollution control devices, exhausting to Stack ID TEA1, constructed in 1996. Specification amine products are filled into containers for distribution. Amines (primarily TEA) emissions and odors are controlled by a liquid scrubber unit, identified as TEA Scrubber System, consisting of series of drums and a plastic tote that contain the acid and water mixture.

(f) The following tanks with over 1 ton per year HAP potential:

Tank 2, fixed roof tank with a storage capacity of 25,000 gallons, constructed in 1995.
Tank 8, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1974.
Tank 9, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1974.
Tank 10, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1974.
Tank 11, fixed roof tank with a storage capacity of 20,000 gallons, constructed in 1973.
Tank 12, fixed roof tank with a storage capacity of 20,000 gallons, constructed in 1973.
Tank 16, fixed roof tank with a storage capacity of 20,000 gallons, constructed in 1973.
Tank 17, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1974.
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Tank 57, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1979.
Tank 58, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1981.
Tank 59, fixed roof tank with a storage capacity of 30,000 gallons, constructed in 1981.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

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

(a) Tank 1, fixed roof tank with a storage capacity of 7,000 gallons, constructed in 1974.
Tank 3, fixed roof tank with a storage capacity of 7,000 gallons, constructed in 1974.
Tank 4, fixed roof tank with a storage capacity of 7,000 gallons, constructed in 1980.
Tank 5, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1974.
Tank 6, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1974.
Tank 7, fixed roof tank with a storage capacity of 7,000 gallons, constructed in 1974.
Tank 13, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 14, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 15, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 20, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 21, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 22, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 23, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 24, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 26, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 27, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 28, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 29, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.

Tank 30, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1974.
Tank 31, fixed roof tank with a storage capacity of 7,000 gallons, constructed in 1974.
Tank 32, fixed roof tank with a storage capacity of 7,000 gallons, constructed in 1974.
Tank 33, fixed roof tank with a storage capacity of 7,000 gallons, constructed in 1974.
Tank 34, fixed roof tank with a storage capacity of 7,000 gallons, constructed in 1974.
Tank 35, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1974.
Tank 36, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1974.
Tank 37, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1974.
Tank 38, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1974.
Tank 39, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1974.
Tank 40, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1974.
Tank 50, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 54, fixed roof tank with a storage capacity of 7,000 gallons, constructed in 1980.
Tank 55, fixed roof tank with a storage capacity of 11,000 gallons, constructed in 1974.
Tank 60, fixed roof tank with a storage capacity of 6,000 gallons, constructed in 1994.
Tank 61, fixed roof tank with a storage capacity of 6,000 gallons, constructed in 1990.
Tank 62, fixed roof tank with a storage capacity of 6,000 gallons, constructed in 1982.
Tank 63, fixed roof tank with a storage capacity of 3,000 gallons, constructed in 1995.
Tank 64, fixed roof tank with a storage capacity of 3,000 gallons, constructed in 1995.
Tank 65, fixed roof tank with a storage capacity of 3,000 gallons, constructed in 1995.
Tank 66, fixed roof tank with a storage capacity of 6,000 gallons, constructed in 1982.
Tank 67, fixed roof tank with a storage capacity of 3,000 gallons, constructed in 1984.
Tank 68, fixed roof tank with a storage capacity of 6,000 gallons, constructed in 1984.
Tank 69, fixed roof tank with a storage capacity of 6,000 gallons, constructed in 1984.
Tank 70, fixed roof tank with a storage capacity of 3,000 gallons, constructed in 1990.
Tank 71, fixed roof tank with a storage capacity of 1,500 gallons, constructed in 1990.
Tank 72, fixed roof tank with a storage capacity of 1,500 gallons, constructed in 1990.
Tank 73, fixed roof tank with a storage capacity of 2,900 gallons, constructed in 1990.
Tank 74, fixed roof tank with a storage capacity of 3,000 gallons, constructed in 2002.
Tank 75, fixed roof tank with a storage capacity of 3,000 gallons, constructed in 2002.
Tank 76, fixed roof tank with a storage capacity of 4,500 gallons, constructed in 2002.
Tank B1, fixed roof tank with a storage capacity of 2,000 gallons, constructed in 1973.
Tank B2, fixed roof tank with a storage capacity of 6,000 gallons, constructed in 1973.
Tank B3, fixed roof tank with a storage capacity of 3,000 gallons, constructed in 1990.
Tank B4, fixed roof tank with a storage capacity of 5,000 gallons, constructed in 1990.
Tank B5, fixed roof tank with a storage capacity of 1,100 gallons, constructed in 1994. ,
Tank B6 fixed roof tank with a storage capacity of 1,000 gallons, constructed in 1994.
Tank B7, fixed roof tank with a storage capacity of 1,000 gallons, constructed in 1994.
Tank B8, fixed roof tank with a storage capacity of 1,100 gallons, constructed in 1994.
Tank B9, fixed roof tank with a storage capacity of 675 gallons, constructed in 1992.
Tank M-1, fixed roof tank with a storage capacity of 1,000 gallons, constructed in 1990.
Tank M-2, fixed roof tank with a storage capacity of 400 gallons, constructed in 1990.
Tank M-3, fixed roof tank with a storage capacity of 2,000 gallons, constructed in 1992.

(b) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour – hot oil heater, identified as HO1, 8.3 MMBtu/hr [326 IAC 6-2-4].

(c) Combustion source flame safety purging on startup.

(d) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (Trichloroethylene degreaser, identified as D-1, with a maximum throughput of 120 gallons per 12 months) [326 IAC 8-3-5].

(f) Cleaners and solvents characterized as follows:

(1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100^{o}F) or;

(2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20^{o}C (68^{o}F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(g) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.

(h) Closed loop heating and cooling systems.

(i) Structural steel and bridge fabricating activities using 80 tons or less of welding consumables.

(j) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(k) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(l) Noncontact cooling tower systems with forced and induced draft cooling tower system not regulated under NESHAP.

(m) Heat exchanger cleaning and repair.

(n) Process vessel degassing and cleaning to prepare for internal repairs.

(o) Paved and unpaved roads and parking lots with public access.

(p) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(q) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(r) Blowdown for any of the following: sight glass; boiler; compressors; pumps, and cooling tower.

(s) On-site fire and emergency response training approved by the department.

(t) Purge double block and bleed valves.

(u) Filter or coalescer media changeout.

(w) A laboratory as defined in 326 IAC 2-7-1(20)(C).

Existing Approvals

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

Part 70 Permit, T097-7395-00286, issued on July 7, 1999.

Exemption for two (2) tanks (Tank 71 and Tank 72) replacements, E097-12021-00286, issued on May 19, 2000.

Administrative Amendment for addition of one (1) 6,000 gallon plastic above ground storage tank containing waste aqueous ammonia (ammonium sulfate salt and water), S097-12377-00286, issued on July 24, 2000.

Exemption for a new process of unloading and repackaging of virgin amines, using already permitted equipment, E097-17438-00286, issued on August 13, 2003.

All conditions from previous approvals were incorporated into this FESOP, except requirements for a Soil Remediation System which was removed from the source in 1997, and Emission Reporting rule 326 IAC 2-6 which was modified in March of 2004 and is no longer applicable to this source.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Administrator 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 FESOP application for the purposes of this review was received on October 3, 2003.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Pages 1 - 6)

Potential to Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, includling air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential Emissions (tons/year)
PM	less than 1
PM-10	less than 1
SO_2	less than 1
VOC	**>250**
CO	less than 1
NO_x	3.61

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)

Individual HAP (worst case - Methylene Chloride)	**>10**
Total HAP	**>25**

(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 any single HAP 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.

(c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

(d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the years 2001-2002 actual emission data (worst case).

Pollutant	Actual Emissions (tons/year)
PM	Less than 1
PM-10	Less than 1
SO_2	Less than 1
VOC	13.55
CO	Less than 1
NO_x	Less than 1
HAP (Trichloroethylene)	4.95
Total HAP	6.6

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Storage Tanks and Special Processing Unit	0	0	0	<94.7	0	0	<10/25
Hot Oil Heater	0.51	0.51	0.02	5.30	21.0	3.61	0

Total Emissions	0.51	0.51	0.02	<100	21.0	3.61	<10/25

County Attainment Status

Pollutant	Status
PM-10	Attainment
SO_2	Maintenance
NO_2	Attainment
1-hour Ozone	Maintenance Attainment
8-hour Ozone	Basic Nonattainment
CO	Maintenance
Lead	Maintenance

(a) Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean 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 the ozone standards. Marion County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review (326 IAC 2-3).

(b) Marion County has been classified as attainment or unclassifiable in Indiana for PM10, SO_2, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Federal Rule Applicability

(a) Tank 2 is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116(a) & (b), Subpart Kb. Since tank 2 was installed after July 23, 1984 and has an individual storage capacity of greater than 75 cubic meters and less than 151 cubic meters and stores liquids with a vapor pressure less than 15 kPa, the only applicable requirements of this subpart are 60.116 (a) and (b). The requirements of this regulation are not included in the permit for other tanks based on the date constructed and/or the storage capacity of the tanks.

(b) This source is not subject to the requirements of the New Source Performance Standards, 326 IAC 12, 40 CFR 60, Subparts K and Ka due to size because no tank has capacity greater than 40,000 gallons.

(c) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.4, Subpart Dc) are not included in the permit for the 8.3 MMBtu/hr natural gas Hot Oil Heater because it is less than 10 MMBtu/hr.

(d) The requirements of the New Source Performance Standard for Synthetic Organic Chemical Manufacturing Operations 40 CFR Parts 60.480, 60.610, 60.660 and 60.700 (Subparts VV, III, NNN, and RRR) are not included in the permit because this source does

not produce chemicals through chemical synthesis but is only involved with storing and blending of chemicals as received, packaging and distribution of chemicals.

(e) The requirements of the National Emission Standard for Hazardous Air Pollutants (MACT) 40 CFR 63.2334 (Subpart EEEE), Organic Liquids Distribution (non-gasoline), are not included in the permit because it is not a major HAP source.

(f) The requirements of the National Emission Standard for Hazardous Air Pollutants (MACT) 40 CFR 63.2435 (Subpart FFFF), Miscellaneous Organic Chemical Production and Processes (MON), are not included in the permit because this is not a chemical manufacturing source, and it is not a major HAP source.

(g) According to 40 CFR Part 64 (Compliance Assurance Monitoring), § 64.2 (Applicability), neither this source or any emission unit at the source is subject to the requirements of 40 CFR Part 64 because it is not a major source that is required to obtain a part 70 or 71 permit.

(h) The requirements of the New Source Performance Standard for Bulk Gasoline Terminals 40 CFR Part 60, Subpart XX are not included in the permit for the Loading Rack, Container Filling Operation, and Special Processing Unit, identified as TEA1, because this is not a bulk gasoline terminal which receives gasoline by pipeline, ship, or barge, but a bulk chemicals and solvents blending, packaging, and distribution facility.

(i) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in the permit for this source.

State Rule Applicability - Entire Source

326 IAC 2-2 Prevention of Significant Deterioration (PSD)

This source is not one of the twenty-eight (28) listed source categories, it was built prior to August 7, 1977, which pre-dates the PSD rule, and no significant modifications have been done since January 1st of 1980. Therefore, this source is not a major source under the PSD regulation, and 326 IAC 2-2 does not apply.

326 IAC 2-3 Emission Offset

This source, located in 8-hour Ozone nonattainment area, has the potential to emit more than 100 tons of VOC per year; however, VOC emissions shall be limited to less than 100 tons per year; therefore, this source is not major under the Emission Offset regulation and 326 IAC 2-3 does not apply.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operations of storage, blending, packaging, and distribution of chemicals will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs, and they were all built prior to July 27, 1997. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source has opted to be a FESOP source, and as such it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program; therefore, pursuant to 326 IAC 2-6-1(a)(1), it is not subject to the requirements of the Emission Reporting rule 326 IAC 2-6.

326 IAC 2-8-4 (FESOP)

(a) The VOC and HAPs emissions from this source shall be limited to less than:

(1) 100 tons of VOC per twelve (12) consecutive month period, rolled monthly,

(2) 10 tons of any individual HAP per twelve (12) consecutive month period, rolled monthly,

(3) 25 tons of any combination of HAPs per twelve (12) consecutive month period, rolled monthly.

(b) In order to calculate VOC and HAPs emissions, the Permittee shall maintain the following records:

(1) the number of gallons of each solvent;
(2) the molecular weight of each solvent;
(3) the vapor pressure of each solvent;
(4) the composition of each solvent (HAPs content);
(5) the type of operation used for each solvent (e.g., container filling or mixing or loading rack);
(6) the date of the transfer.

(c) VOC and HAP emissions calculations shall be performed for the following equipment and operations:

(1) Loading rack;
(2) Container Filling and Blending operations, and
(3) Tanks Storage.

(d) VOC emission factors for emissions generated by Loading rack, Container filling and Blending operations shall be calculated using the following formula (AP-42, section 4.4):

E= 12.46*S*P*M/T, where:

E = pounds of emissions per 1000 gallons loaded;
S= saturation factor (1.45 for splash loading and 0.5 for submerged fill);
P = vapor pressure (psia);
M = mol. wt (lb/lb mole);
T = Temp (R).

(e) VOC Emissions from Mixing operations shall be calculated using the following formula (EIIP, Vol. 2, Ch. 8):

E = M * Kx * A * P * 3600 * H/ (R*T), where:

E = emission in pounds
T = Temp (Rankine) = 530
M = Mol. Wt (lb/lb-mole)
P = Vapor pressure (psia)
A = Area of tank (average 29 sf)
H = batch time (hrs)
Kx = gas phase mass transfer coeff.
Kx = 0.00438* (U^0.78)(18/M)^1/3
U = wind speed = 0.1 mph
R = Universal gas constant = 10.73

(f) For the purpose of HAPs emission calculations, 100% of HAP content in solvents shall be accounted for as HAP emissions.

(g) Storage Tanks emissions shall be calculated using EPA's TANKS program (4.0 or more current version).

(h) The Permittee requested approval of implementing the computer-based operating system Chempax in order to track material usage, accounting information and customer data. Chempax system is source-specific, it has been in place and used for recordkeeping and reports generation. This system shall provide detailed data regarding transactions for the purposes of supporting environmental reporting. The Chempax system shall provide reports for any range of calendar days, and reports generated by Chempax shall contain the following information:

(1) For bulk transfers: date, receipt number, product name, composition (amount of VOC and HAPs), amount in pounds, specific gravity, input location, and output location.

(2) For container filling transfers: date, receipt number, product name, composition (amount of VOC and HAPs), amount in pounds, specific gravity, time of transfer, duration of transfer, and type of transfer (bulk to container, container to container, or blend in container).

(3) For blending tank operations: date, receipt number, product name, composition (amount of VOC and HAPs), amount in pounds, specific gravity, time of blend, duration of blend.

(i) The Chempax system data shall be used to determine the material throughput for each tank as an input into the TANKS program for each of the permitted tanks. Each bulk storage tank shall have a unique identifier to determine what materials go into and out of each bulk storage tank.

(j) The Chempax data output shall be available in Excel spreadsheets format, where molecular weight and vapor pressure shall be added for each material, and VOC and HAPs (individual and combined) emissions shall be calculated.

(k) The source shall keep records of chemicals inventory and throughput for each transfer and storage operation (input and output data of Chempax system and TANKS program) for the term of three (3) years.

326 IAC 5-1 (OpacityLimitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 8-6 (Organic Solvent Emission Limitation)

This source is not subject to this rule because its limited potential to emit VOC is less than 100 tons per year.

State Rule Applicability - Individual Facilities

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Since the natural gas fired Hot Oil Heater, Emission Unit ID HO1, is located in Marion County and was installed after 1983, the particulate emissions are limited pursuant to 326 IAC 6-2-4. Pursuant to 326 IAC 6-2-4(a), the Particulate Matter (PM) emissions from the 8.3 million Btu per hour Hot Oil Heater, identified as HO1, shall be limited to 0.6 pounds per million Btu of heat input.

326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies)

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c), which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply, shall not exceed 0.551 pounds per hour.

326 IAC 8-1-6 (New facilities; general reduction requirements)

(a) Pursuant to 326 IAC 8-1-6, new facilities, as of January 1, 1980, that may be subject to this rule, are Storage and Blending Tanks ID 2, 25, 54, 56, 58, 59, 61 to 75, B3 to B9, M-1 to M-3, constructed after January 1, 1980. However, none of these tanks have potential emissions of 25 or more tons per year of VOC. Therefore, they are not subject to 326 IAC 8-1-6.

(b) The Loading Rack is not subject to 326 IAC 8-1-6 because it was built before January 1, 1980 (in 1974).

(c) The Special Processing Unit, identified as TEA1, with maximum processing capacity of 500,000 gallons per year of spent scrubber solutions from foundries air pollution control devices, constructed in 1996, may be subject to 326 IAC 8-1-6. However, its VOC emissions shall be limited to less than 25 tons per year before control; therefore, it is not subject to 326 IAC 8-1-6.

(d) This source is not subject to 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels), because it is not located in Clark, Floyd, Lake, or Porter Counties.

326 IAC 8-3-2 Cold cleaner operation

This rule is not applicable to this source because potential VOC emission of the cold cleaner degreaser operation, which is an insignificant activity, existing as of January 1, 1980 in Marion County, is less than 100 tons per year.

326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F);

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)),

then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure that does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius ($48.9^{O}C$) (one hundred twenty degrees Fahrenheit ($120^{O}F$)):

(A) A freeboard that attains a freeboard ratio of seventy-five-hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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

326 IAC 8-4-3 does not apply to this source since none of the tanks have a storage capacity of greater than 39,000 gallons.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This regulation does not apply to any of the storage vessels at this source since this source is not located in Clark, Floyd, Lake or Porter Counties.

No other 326 IAC 8 rules apply to this source.

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, OAQ, and OES, 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 in 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 approporiate corrective actions within a specific time period.

Conclusion

The operation of this distribution of industrial chemicals and related materials, including blending, container filling and other packaging activities shall be subject to the conditions of the attached proposed FESOP No. 097-18042-00286.

Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services

Addendum to the Technical Support Document (TSD) for a FESOP

Source Name: **Superior Oil Company, Inc.**
Source Location: **400 West Regent Street, Indianapolis Indiana 46225**
County: **Marion**
SIC Code: **5169, 2899**
Operation Permit No.: **F097-18042-00286**
Permit Reviewer: **B. Gorlin**

On March 26, 2005, the Indianapolis Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that on October 3, 2003 Superior Metal Oil Company, Inc. applied for transition from Part 70 Permit to FESOP, based on actual annual emissions below the FESOP thresholds.

The notice also stated that the OES proposed to issue a FESOP 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.

The TSD will remain as it originally appeared when published. Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and Indianapolis OES prefer that the Technical Support Document reflects the permit that was on public notice. Changes to the permit or technical support material that occur after the permit has been published are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision (bolded language has been added, the language with a line through it has been deleted).

Written comments were received from the Applicant, Superior Oil Company, Inc. on April 5 and April 19, 2005. These comments and OES responses, including changes to the permit, are as follows.

Comment 1:

(a) Source Description (Section A.2 and D.1). The throughput limits included in the source description sections of the permit were provided by Superior in the permit application. However, these were based on historical ACTUAL throughputs rather than the maximum POTENTIAL throughputs.

The potential to emit calculations provided in the application and in the technical support documents are correct. These are based on the actual maximum hourly throughputs over 8760 hours per year. However, these throughputs will not be approached due to actual work practices that do not permit continuous operation of the equipment (e.g., the pumps are not continuously operated due to necessary operations such as moving containers, labeling, bottlenecks, etc). There have been no changes to the equipment used or the hourly throughput rates. Nonetheless, we would like to correct the source descriptions and apologize for the confusion that the initial application may have caused.

(1) A.2(a)/D.1(a) – The loading rack, if described by the maximum potential throughput (based on the rate of 125 gallons per minute maximum pumping over 8760 hours per year) would have a maximum throughput of 65,700,000 gallons per year. This would be either bulk or containerized receipts.

(2) A.2(b)/D.1(b) – Blending operations, if described by the maximum potential throughput (based on the rate of 75 gallons per minute maximum pumping over 8760 hours per year) would have a maximum throughput of 39,420,000 gallons per year.

(3) A.2(c)/D.1(c) – Compounding operations, if described by the maximum potential throughput (based on the rate of 75 gallons per minute maximum pumping over 8760 hours per year) would have a maximum throughput of 39,420,000 gallons per year.

(4) A.2(d)/D.1(d) – Container filling operations, if described by the maximum potential throughput (based on the rate of 75 gallons per minute maximum pumping over 8760 hours per year) would have a maximum throughput of 39,420,000 gallons per year.

(5) A.2(e)/D.1(e) – The Special Processing Unit for amines, if described by the maximum potential throughput (based on the rate of a 650 pound cylinder every 3 minutes over 8760 hours per year) would have a maximum throughput of 18,980,000 gallons per year.

Response 1:

The emission calculations (see TSD Appendix A, pages 3-11) were based on the following maximum potential chemicals throughputs:

(a) Bulk Loading: 65,700,000 gallons per year;

(b) Blending, Compounding, and Filling Operations: 39,420,000 gallons per year each;

(c) Special Processing Unit (TEA1): 18,980,000 gallons of spent scrubber solutions.

Correction in the description of the operations maximum potential capacity to the numbers above will not change the permitted equipment maximum capacity. PTE calculations have already incorporated the worst case scenario of the above maximum potential throughputs. These corrections do not result in or require any changes in permit limits and rules applicability. The current permit compliance demonstration, emission calculation and reporting are based on actual chemicals throughput.

The following changes were made to the permit:

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) Loading Rack for receiving and shipping chemicals and solvents (via rail car or tank truck and containerized), with maximum capacity of **65,700,000** ~~10,000,000~~ gallons per year of bulk **or containerized** receipts~~, and 6,000,000 gallons per year of containerized receipts~~.

(b) Blending operation, consisting of pumps, hoses, and blend tanks, used for making custom solvent blends, with maximum capacity of **39,420,000** ~~800,000~~ gallons per year. Finished blends are packaged directly from the blend tanks or transferred to storage tanks.

(c) Compounding Operations, consisting of mix, blend, and storage tanks, used for the compounding of water based cleaners with low VOC type additives, with maximum capacity of **39,420,000** ~~3,450,000~~ gallons per year. Finished blends are packaged directly from the mix tanks or transferred to storage tanks.

(d) Container Filling Operations, with maximum capacity of **39,420,000** ~~3,000,000~~gallons per year. Containers (drums, pails, and totes) are filled from other containers, blend tanks or bulk storage tanks prior to shipment with straight products and blends.

(e) Special Processing Unit, identified as TEA1, with maximum processing capacity of **18,980,000** ~~500,000~~ gallons per year of spent scrubber solutions from foundries air pollution control devices, exhausting to Stack ID TEA1, constructed in 1996. Specification amine products are filled into containers for distribution. Amines (primarily TEA) emissions and

odors are controlled by a liquid scrubber unit, identified as TEA Scrubber System, consisting of series of drums and a plastic tote that contain the acid and water mixture.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) Loading Rack for receiving and shipping chemicals and solvents (via rail car or tank truck and containerized), with maximum capacity of **65,700,000** ~~10,000,000~~ gallons per year of bulk **or containerized** receipts~~, and 6,000,000 gallons per year of containerized receipts~~.

(b) Blending operation, consisting of pumps, hoses, and blend tanks, used for making custom solvent blends, with maximum capacity of **39,420,000** ~~800,000~~ gallons per year. Finished blends are packaged directly from the blend tanks or transferred to storage tanks.

(c) Compounding Operations, consisting of mix, blend, and storage tanks, used for the compounding of water based cleaners with low VOC type additives, with maximum capacity of **39,420,000** ~~3,450,000~~ gallons per year. Finished blends are packaged directly from the mix tanks or transferred to storage tanks.

(d) Container Filling Operations, with maximum capacity of **39,420,000** ~~3,000,000~~ gallons per year. Containers (drums, pails, and totes) are filled from other containers, blend tanks or bulk storage tanks prior to shipment with straight products and blends.

(e) Special Processing Unit, identified as TEA1, with maximum processing capacity of **18,980,000** ~~500,000~~ gallons per year of spent scrubber solutions from foundries air pollution control devices, exhausting to Stack ID TEA1, constructed in 1996. Specification amine products are filled into containers for distribution. Amines (primarily TEA) emissions and odors are controlled by a liquid scrubber unit, identified as TEA Scrubber System, consisting of series of drums and a plastic tote that contain the acid and water mixture.

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Comment 2:

Compliance Determination Requirements (Section D.1.6). We appreciate your willingness to allow our facility to use our computer tracking system to demonstrate facility-wide compliance rather that to impose chemical-specific throughput limits. This system is expected to be in use at all times – since it's inception there have been no times when it has been unavailable. However, should that become the case on a temporary basis due to unforeseen circumstances, we do not wish to be in violation of our permit.

Therefore we would appreciate adding a statement (perhaps in D.1.6(i)) that "In the event that the Chempax system should be unavailable, paper records providing the same data shall be used to provide data for the purposes of emissions calculations and compliance determination."

Response 2:

The following change was made to the Permit Condition D.1.6:

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]

(a) The Permittee shall use a computer-based operating system Chempax to track material usage, accounting information and customer data. This system shall provide detailed data regarding transactions for the purposes of supporting environmental reporting. The Chempax system shall provide reports for any range of calendar days, and reports generated by Chempax shall contain the following information:

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(i) In the event that the Chempax system should be unavailable, paper records providing the same data shall be used and kept to provide data for the purposes of emissions calculations and compliance determination.

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In the course of the permit processing, the following changes were made to the permit.

Marion County has been classified as nonattainment for PM2.5 (by U.S.EPA in Federal Register Notice 70 FR 943, effective April 5, 2005). Therefore, PM2.5 emissions were reviewed pursuant to the requirements for nonattainment new source review. There have been no modifications or revisions to this source that were major modifications for PM2.5 pursuant to nonattainment new source review requirements. This FESOP does not incorporate any modifications that increase the potential to emit PM2.5 of this source such that the source is a major source, pursuant to nonattainment new source review requirements. Therefore, nonattainment new source review requirements for PM2.5 are not applicable to the source. However, a revised County Attainment status table, as of April 5, 2005, and Condition A.1 of F097-18042-00127 are revised as follows:

Pollutant	Status
PM-10	Unclassifiable
PM2.5	**Nonattainment**
SO_2	Maintenance attainment
NO_X	Attainment
1-hour Ozone	Maintenance attainment
8-hour Ozone	Basic nonattainment
CO	Attainment
Lead	unclassifiable

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

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Source Location Status:	Marion County
	Nonattainment for ozone under the 8-hour standard
	Nonattainment for PM2.5
	Attainment for all other criteria pollutants.
	Not 1 of 28 Source Categories
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, Section 112 of the Clean Air Act
	Minor Source, under PSD or Emission Offset Rules
	Not 1 of 28 Source Categories

Appendix A: Emission Calculations

Company Name:	**Superior Oil Company**
Plant Location:	**400 West Regent Street, Indianapolis India**
County:	**Marion**
FESOP:	**097-18042-00286**
Plt. ID:	**097-00286**
Permit Reviewer:	**Boris Gorlin**

Table 1 - Storage Tank Emissions Summary

Tanks 01-76	Potential Working Losses (lb/yr)	Potential Breathing Losses lb/yr	Total Potential Emissions (ton/yr)
Totals:	89,785	5,350	47.57
Total VOC	67,573	4,168	35.87
Total HAP	48,611	3,341	25.98
Indiv. HAP (Meth. Chl.)			14.45

	Appendix A: Emission Calculations							
		Company Name:		**Superior Oil Company**				
		Plant Location:		**400 West Regent Street, Indianapolis Indiana**				
			County:	**Marion**				
			FESOP:	**097-18042-00286**				
			Plt. ID:	**097-00286**				
		Permit Reviewer:		**Boris Gorlin**				
Table 2 - Bulk Loading Emissions (Loading								
		Tank Truck	Molecular	True Vapor	Emiss. Factor	Potential	Potential	
		Throughput	Weight	Pressure	(lbs/1000 gal)	Emissions	Emissions (ton/yr)	
		(total gal)		(psi)		(lbs/year)	VOC	HAP
		Maximum:	**230.00**	**14.05**	**40.68**	**974,237**	**487.12**	**487.12**
		Average:	**109.33**	**0.85**	**2.42**	**131,436**	**65.72**	**145.35**
Notes:								
Emissions using AP-42 EF for loading losses (Chapter 4.4)								
E = 12.46 *S*P*M/T = pounds of emissions per 1000 gallons loaded								
T = Temp (Rankine) = 530								
M = Mol. Wt (lb/lb-mole)								
P = Vapor pressure (psia)								
S = Saturation factor (1.45 for splash loading)								
The loading may consist of various products and blends as shown above.								
Each of these was calculated separately to show the various "maximums".								
Maximum throughput for entire area is based on pump rate of 125 gallons per minute								
The max throughput for this area (in 1000 gal) would be 125 gpm*60 min/hr*8760 hrs/yr =						65,700	kgal/yr	
Please note that the volume of methylene chloride is less based on the OSHA specific standard (29 CFR 1910.1052) for								
working with this. PPE and other restrictions make it impossible to work at "full speed" and the throughput								
would be approximately 35% of the other products and compounds.								

Appendix A: Emission Calculations

Company Name: **Superior Oil Company**
Plant Location: **400 West Regent Street, Indianapolis Indiana**
County: **Marion**
FESOP: **097-18042-00286**
Plt. ID: **097-00286**
Permit Reviewer: **Boris Gorlin**

Table 3 - Solvent Blending Operations

Product	Molecular Weight	Vapor Pressure (psi)	Factor	Kx	Loading Emissions Factor	Loading Emissions (lb/yr)	Blending Emissions (lb/yr)	Total Emissions (lb/yr)	Total Emissions (ton/yr)
Maximum:	**133.0**	**2.37**		**0.0006**	**1.99**	**78,630**	**12,577**	**91,208**	**45.60**
Average:	**91.13**	**1.05**		**0.0004**	**0.90**	**35,310**	**5,531**	**40,842**	**20.42**

The blending may consist of many various blends as shown above. Each of these is calculated separately to show various "maximums".
Those that are shaded contain up to 80% HAPs
Maximum throughput for blend loading is based on drum filling. One drum can be filled at a time with a rate of 75 gallons per minute
The maximum throughput for this area (in 1000 gal) would be 75 gpm*60 min/hr*8760 hrs/yr = 39,420 (1000 gal)
The blending emissions are a function of time rather than throughput and 8760 hours was used.

Emissions using AP-42 EF for loading losses (Chapter 4.4)
E = 12.46 *S*P*M/T = pounds of emissions per 1000 gallons loaded
T = Temp (Rankine) = 530
M = Mol. Wt (lb/lb-mole)
P = Vapor pressure (psia)
S = Saturation factor (1.45 for splash loading)

Mixing emissions (EIIP Volume2, Chapter 8)
E = M * Kx * A * P * 3600 * H/ (R*T)
E = emission in pounds
T = Temp (Rankine) = 530
M = Mol. Wt (lb/lb-mole)
P = Vapor pressure (psia)
A = Area of tank (average 29 sf)
H = batch time (hrs)
Kx = gas phase mass transfer coeff.
Kx = 0.00438* (U^0.78)(18/M)^1/3
U = wind speed = 0.1 mph
R = Universal gas constant = 10.73

Appendix A: Emission Calculations

Company Name: Superior Oil Company
Plant Location: 400 West Regent Street, Indianapolis Indiana
County: Marion
FESOP: 097-18042-00286
Plt. ID: 097-00286
Permit Reviewer: Boris Gorlin

Table 4 - Aqueous Products Compounding

	Molecular Weight	Vapor Pressure (psi)	Batch Time (hrs)	Kx	Loading Emissions Factor	Loading Emissions (pounds)	Blending Emissions (pounds)	Total Emissions (pounds)	Total Emissions (tons)
Maximum:	**140**	**0.50**	**8,760**	**0.00037**	**0.82**	**32,436**	**4,158**	**36,594**	**18.30**
Average:	**140**	**0.28**	**8,760**	**0.00037**	**0.45**	**17,840**	**2,287**	**20,127**	**10.06**

The blending may consist of many various blends as shown above. Each of these is calculated separately to show various "maximums".
Maximum throughput for blend loading is based on drum filling. One drum can be filled at a time with a rate of 75 gallons per minute
The maximum throughput for this area (in 1000 gal) would be 75 gpm*60 min/hr*8760 hrs/yr = 39,420 (1000 gal)
The blending emissions are a function of time rather than throughput and 8760 hours was used.

Emissions using AP-42 EF for loading losses (Chapter 4.4)
E = 12.46 *S*P*M/T = pounds of emissions per 1000 gallons loaded
T = Temp (Rankine) = 530
M = Mol. Wt (lb/lb-mole)
P = Vapor pressure (psa)
S = Saturation factor (1.45 for splash loading)

Appendix A: Emission Calculations

Company Name: **Superior Oil Company**
Plant Location: **400 West Regent Street, Indianapolis Indiana**
County: **Marion**
FESOP: **097-18042-00286**
Plt. ID: **097-00286**
Permit Reviewer: **Boris Gorlin**

Table 5. Container Filling Operations

	Molecular Weight	True Vapor Pressure (psi)	Emiss.Factor (lbs/1000 gal)	Potential Emissions (lbs/year)	Potential Emissions (ton/yr)	
					VOC	HAP
Maximum:	**484.00**	**6.75**	**19.55**	**584,542**	**292.3**	**292.3**
Average:	116.93	0.64	1.77	64,152	32.08	79.73

Notes:
Emissions using AP-42 EF for loading losses (Chapter 4.4)
E = 12.46 *S*P*M/T = pounds of emissions per 1000 gallons loaded
T = Temp (Rankine) = 530
M = Mol. Wt (lb/lb-mole)
P = Vapor pressure (psia)
S = Saturation factor (1.45 for splash loading)

The drumming may consist of many various products and blends as shown above. Each of these is calculated separately to show various "maximums".
The maximum throughput for entire area is based on drum filling. One drum can be filled at a time with a rate of 75 gallons per minute
The maximum throughput for this area (in 1000 gal/yr) would be 75 gpm*60 min/hr*8760 hrs/yr = 39,420
Please note that the volume of methylene chloride is less based on the OSHA specific standard for working
with this. PPE and other restrictions make it impossible to work at "full speed" and a rate of 30 drums per hour (14,454,000 gal/yr) was used

Appendix A: Emission Calculations

Company Name:	**Superior Oil Company**
Plant Location:	**400 West Regent Street, Indianapolis Indiana 46225**
County:	**Marion**
FESOP:	**097-18042-00286**
Plt. ID:	**097-00286**
Permit Reviewer:	**Boris Gorlin**

Table 6. Amine Processing Operations (TEA Storage tanks and reactors)

Total Potential Emissions (lbs/yr)	Total Potential Emissions (ton/yr)	Potential Controlled Emissions (ton/yr)
4,954	**2.48**	**2.34**

Source: TANKS v. 4.0

* These are connected to a sulfuric acid scrubber that controls odors and emissions at an estimated 85%

Containerizing of Materials

	MW	Vp	EF (lb/1000 gal)	Potential Emissions (ton/yr)	Potential Controlled Emissions (ton/yr)	
HAP	101	1.04	3.5807	11.3	1.7	*
	101	1.04	3.5807	11.3	1.7	*
	97.7	1.19	3.9633	**12.5**	1.9	*
			Total:	**35.19**	**5.28**	*

* These are connected to a sulfuric acid scrubber that controls odors and emissions. However, the emissions are shown here as both controlled and uncontrolled since the efficiency of the scrubber is not well defined. The efficiency is estimated at 85% based on a literature search.

Notes:

Emissions using AP-42 EF for loading losses (Chapter 4.4)

E = 12.46 *S*P*M/T = pounds of emissions per 1000 gallons loaded

T = Temp (Rankine) = 530

M = Mol. Wt (lb/lb-mole)

P = Vapor pressure (psia)

S = Saturation factor (1.45 for splash loading)

The rate is based on the maximum rate of cylinder filling - 650 pounds every 3 minutes.

Annual potential is 650 lbs/cyl * gal/6.1 lbs * 20 cyl/hr *8760 hrs * = 18,980,000 gallons

It was assumed that this is distributed between the TEA, DMIPA and misc. amines.