



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: June 18, 2012

RE: Superior Solvents and Chemicals, Inc../039-30834-00487

FROM: Matthew Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 require 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, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing 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 Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FNPER.dot12/03/07



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## Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Superior Solvents and Chemicals, Inc.**  
**1030 All Pro Drive**  
**Elkhart, Indiana 46514**

(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 provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or 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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions

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.

Operation Permit No. F039-30834-00487	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 18, 2012  Expiration Date: June 18, 2022

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). 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)]

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The Permittee owns and operates a stationary chemical solvents distribution terminal.

Source Address:	1030 All Pro Drive, Elkhart, Indiana 46514
General Source Phone Number:	(317) 781-4400
SIC Code:	5169 (Chemicals and Allied Products, NEC)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) solvent truck loading and unloading operation, identified as EU-1, constructed in 1998, with a maximum capacity of 100 gallons per minute;
- (b) One (1) container filling operation, identified as EU-2, constructed in 1998, with a maximum capacity of 60 gallons per minute, capable of filling drums, totes, and pails with solvents from tanks, or with solvents or resins directly from truck transport;
- (c) One (1) resin container filling operation, identified as EU-3, constructed in 1988, with a maximum capacity of 60 gallons per minute, capable of filling drums, totes, and pails with resins directly from truck transport;
- (d) One (1) tote/drum solvent blending operation, identified as EU-4, constructed in 2011, occurring in a 55-gallon drum and/or tote up to 550 gallons;
- (e) Six (6) vertical fixed roof solvent storage tanks designated T1 through T6, all installed in 1988, with maximum capacities of 10,000 gallons, each, exhausting to vents T1 through T6, respectively;
- (f) Six (6) vertical fixed roof storage tanks, designated as T7 through T12, approved for construction in 2011, with maximum capacities of 10,000 gallons, each, exhausting to vents T7 through T12, respectively;
- (g) One (1) vertical fixed roof solvent blend tank designated B2, approved for construction in 2007, with a maximum capacity of 2,500 gallons;
- (h) One (1) portable solvent blend tank designated B3, approved for construction in 2007, with a maximum capacity of 600 gallons; and
- (i) One (1) tote tank cleaning operation using caustic cleaning agents, constructed in 1988.

- (j) One (1) electric tank truck fan blower, used to blow residual vapor out of tank trucks or storage totes, with a maximum throughput capacity of 5,110 trucks.

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:

- (a) natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) Multiple space heaters with a combined heat input capacity of 2.6 MMBtu/hr.
- (b) One (1) electric tote fan blower, used to blow residual vapor out of storage totes, with a maximum throughput capacity of 7,300 totes per year.

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) to renew a Federally Enforceable State Operating Permit (FESOP).

## SECTION B GENERAL CONDITIONS

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

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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.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

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- (a) This permit, F039-30834-00487, is issued for a fixed term of ten (10) 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 of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

### B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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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, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Severability [326 IAC 2-8-4(4)]

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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.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ 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. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, 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.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

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- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent 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.9 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (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 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, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ 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.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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 and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ 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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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.12 Emergency Provisions [326 IAC 2-8-12]**

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- (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 describe 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, or Northern Regional Office 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 Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (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 and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ 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 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.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F039-30834-00487 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or

(3) deleted.

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

**B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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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.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]**

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(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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 IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ 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)]**

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(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue

MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) 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 on or before the date it is due.
- (c) 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 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, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being 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  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a 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 limitations provided in 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  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

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

- (b) **Emission Trades [326 IAC 2-8-15(b)]**  
The Permittee may trade emissions increases and decreases at 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(b).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(c)]**  
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 Source Modification Requirement [326 IAC 2-8-11.1]**

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

**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]**

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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, 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  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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 no later than 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 317-233-4230 (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]**

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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

### Emission 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 [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.

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.
- (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.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) 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.

(d) 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 5-1-1 (Applicability) and 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 forty percent (40%) 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]

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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]

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The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

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- (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  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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 that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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 Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

#### **C.8 Performance Testing [326 IAC 3-6]**

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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 not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ 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.9 Compliance Requirements [326 IAC 2-1.1-11]**

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

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Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

#### **C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

#### **C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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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.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.14 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

### C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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- (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. Support information includes the following:
- (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP.
- Records of required monitoring information include the following:
- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
  - (BB) The dates analyses were performed.
  - (CC) The company or entity that performed the analyses.
  - (DD) The analytical techniques or methods used.
  - (EE) The results of such analyses.
  - (FF) The operating conditions as existing at the time of sampling or measurement.

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 Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

### C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that 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 not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:
- Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (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 on or before the date it is due.

- (d) Reporting periods are 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.17 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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 applicable standards for recycling and emissions reduction.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) solvent truck loading and unloading operation, identified as EU-1, constructed in 1998, with a maximum capacity of 100 gallons per minute;
- (b) One (1) container filling operation, identified as EU-2, constructed in 1998, with a maximum capacity of 60 gallons per minute, capable of filling drums, totes, and pails with solvents from tanks, or with solvents or resins directly from truck transport;
- (c) One (1) resin container filling operation, identified as EU-3, constructed in 1988, with a maximum capacity of 60 gallons per minute, capable of filling drums, totes, and pails with resins directly from truck transport;
- (d) One (1) tote/drum solvent blending operation, identified as EU-4, constructed in 2011, occurring in a 55-gallon drum and/or tote up to 550 gallons;
- (e) Six (6) vertical fixed roof solvent storage tanks designated T1 through T6, all installed in 1988, with maximum capacities of 10,000 gallons, each, exhausting to vents T1 through T6, respectively;
- (f) Six (6) vertical fixed roof storage tanks, designated as T7 through T12, approved for construction in 2011, with maximum capacities of 10,000 gallons, each, exhausting to vents T7 through T12, respectively;
- (g) One (1) vertical fixed roof solvent blend tank designated B2, approved for construction in 2007, with a maximum capacity of 2,500 gallons;
- (h) One (1) portable solvent blend tank designated B3, approved for construction in 2007, with a maximum capacity of 600 gallons; and
- (i) One (1) tote tank cleaning operation using caustic cleaning agents, constructed in 1988.
- (j) One (1) electric tank truck fan blower, used to blow residual vapor out of tank trucks or storage totes, with a maximum throughput capacity of 5,110 trucks.

### Insignificant Activities

- (a) natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) Multiple space heaters with a combined heat input capacity of 2.6 MMBtu/hr.
- (b) One (1) electric tote fan blower, used to blow residual vapor out of storage totes, with a maximum throughput capacity of 7,300 totes per year.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 not applicable, the Permittee shall comply

with the following:

- (a) VOC emissions from the solvent truck loading and unloading operation (EU-1), shall not exceed 24.90 tons per twelve (12) consecutive month period, with compliance determined at the end of each month; and
- (b) VOC emissions from the electric tank truck fan blower shall not exceed 24.90 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits shall limit the VOC emissions from the solvent truck loading and unloading operation (EU-1) and electric tank truck fan blower to less than twenty-five (25) tons per twelve (12) consecutive month period, each and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

#### D.1.2 FESOP Limits [326 IAC 2-8-4]

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In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (a) The combined VOC emissions from the solvent truck loading and unloading operation (EU-1), container filling operation (EU-2), resin container filling operation (EU-3), tote/drum solvent blending operation (EU-4), solvent storage tanks (T1 through T12), solvent blend tanks (B2 and B3), electric tank truck fan blower, and electric tote fan blower shall not exceed 99.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The combined worst-case single HAP emissions from the solvent truck loading and unloading operation (EU-1), container filling operation (EU-2), resin container filling operation (EU-3), tote/drum solvent blending operation (EU-4), solvent storage tanks (T1 through T12), solvent blend tanks (B2 and B3), electric tank truck fan blower, and electric tote fan blower shall not exceed 9.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The total combined HAP emissions from the solvent truck loading and unloading operation (EU-1), container filling operation (EU-2), resin container filling operation (EU-3), tote/drum solvent blending operation (EU-4), solvent storage tanks (T1 through T12), solvent blend tanks (B2 and B3), electric tank truck fan blower, and electric tote fan blower shall not exceed 24.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC and HAPs from all other emission units at this source, shall limit the source-wide total potential to VOC to less than one hundred (100) tons per twelve (12) consecutive month period, any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) not applicable.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

## Compliance Determination Requirements

### D.1.4 Volatile Organic Compounds and Hazardous Air Pollutants [326 IAC 8-1-2][326 IAC 8-1-4]

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Compliance with the VOC and HAP limits contained in Conditions D.1.1 and D.1.2 shall be determined by the following:

- (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) Solvent Loading;
  - (2) Container Filling and Blending operations, and
  - (3) Storage Tanks.
- (e) Emissions of each VOC and HAP generated by the solvent truck loading and unloading operation (EU-1), container filling operation (EU-2), resin container filling operation (EU-3), and the loading of solvent into the tote/drum solvent blend operation (EU-4) shall be calculated using the following formula (AP-42, Chapter 5.2):

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

E = pounds of VOC or HAP emissions per 1000 gallons of liquid loaded;  
S = saturation factor (0.5 for submerged loading, 1.45 for splash loading);  
P = vapor pressure of VOC or HAP in liquid (psia);  
M = molecular weight of VOC or HAP in liquid (lb/lb mole);  
T = temperature of liquid loaded (°Rankin).

- (f) Emissions of each VOC and HAP from mixing of solvents in the tote/drum solvent blend operation (EU-4) shall be calculated using the following formula (Emission Inventory Improvement Program (EIIP), Volume II, Chapter 8):

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

E = emissions in pounds per batch

T = temperature of liquid mixed in tank (°Rankin)

M = molecular weight of VOC or HAP in liquid (lb/lb-mole)

P = vapor pressure of VOC or HAP in liquid (psia)

A = surface area of liquid in tank (84 ft<sup>2</sup>)

H = batch time (hrs)

K<sub>x</sub> = gas phase mass transfer coefficient of VOC or HAP in liquid

$K_x = 0.00438 * (U^{0.78}) / (18/M)^{1/3}$

U = wind speed = 0.1 mph

R = universal gas constant at 1 atmosphere of pressure = 10.73 psia-ft<sup>3</sup>/°R-lb-mol

- (g) VOC and HAP emissions from the electric blowers shall be calculated using the following formulas:

$$\text{VOC (tons/yr)} = \frac{T * G_{\text{VOC}} * W_{\text{VOC}} * D}{2000 \text{ pounds/ton}}$$

Where:

T = Number of cargo tanks dried per twelve (12) consecutive month period

G<sub>VOC</sub> = Gallons of VOC containing material remaining in each cargo tank or tote to be dried  
= 1.46 gallons for each cargo tank  
= 0.126 gallons for each tote

W<sub>VOC</sub> = Weight percent of VOC in material remaining in each cargo tank or tote to be dried

D = Density of material remaining in each cargo tank or tote to be dried (lbs/gallon)

$$\text{Single HAP (tons/yr)} = \frac{T * G_{\text{HAP}} * W_{\text{SHAP}} * D}{2000 \text{ pounds/ton}}$$

Where:

T = Number of cargo tanks/totes dried per twelve (12) consecutive month period

G<sub>HAP</sub> = Gallons of HAP containing material remaining in each cargo tank or tote to be dried  
= 1.46 gallons for each cargo tank  
= 0.126 gallons for each tote

W<sub>SHAP</sub> = Weight percent of each HAP in material remaining in each cargo tank or tote to be dried

D = Density of material remaining in each cargo tank or tote to be dried (lbs/gallon)

$$\text{Total HAPs (tons/yr)} = \frac{T * G_{\text{HAP}} * W_{\text{THAP}} * D}{2000 \text{ pounds/ton}}$$

Where:

T = Number of cargo tanks/totes dried per twelve (12) consecutive month period

G<sub>HAP</sub> = Gallons of HAP containing material remaining in each cargo tank or tote to be dried  
= 1.46 gallons for each cargo tank  
= 0.126 gallons for each tote

W<sub>THAP</sub> = Weight percent of combined HAPs in material remaining in each cargo tank or tote to be dried

D = Density of material remaining in each cargo tank or tote to be dried (lbs/gallon)

- (h) For the purpose of HAP emission calculations, 100% of HAP content in solvents shall be accounted for as HAP emissions.
- (i) Storage Tanks emissions shall be calculated using EPA's TANKS program (version 4.09d or most current version).
- (j) 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)]**

#### **D.1.5 Record Keeping Requirements**

- (a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records of the chemical inventory and throughput for each solvent loading operation, each container filling and blending operation, and each storage tank (input and output data of Chempax system and TANKS program) and for each of the electric blowers. Records necessary to demonstrate compliance shall be available no later than thirty (30) days of the end of each compliance period and shall include, but not be limited to:
  - (1) the number of gallons of each solvent processed and the composition of each solvent (VOC and HAP content by weight) each month. Records shall include manifests, receiving papers, material certifications, material safety data sheets (MSDS), and/or other documentation;
  - (2) the molecular weight of each VOC and HAP within each solvent;
  - (3) the vapor pressure of each VOC and HAP within each solvent;
  - (4) the type of operation used for each solvent (e.g., container filling or mixing or loading rack or cargo tank/tote blowers);
  - (5) the date of the transfer.
  - (6) Parameter values used to calculate pollutant emissions as specified in the

equations contained in Condition D.1.4; and

- (7) The total VOC, total worst case single HAP, and total combined HAPs, emitted each month and each compliance period using the equations contained in Condition D.1.4.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.6 Reporting Requirement

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH**

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

Source Name: Superior Solvents and Chemicals, Inc.  
Source Address: 1030 All Pro Drive, Elkhart, Indiana 46514  
FESOP Permit No.: F039-30834-00487

**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 AND ENFORCEMENT BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: (317) 233-0178  
Fax: (317) 233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Superior Solvents and Chemicals, Inc.  
Source Address: 1030 All Pro Drive, Elkhart, Indiana 46514  
FESOP Permit No.: F039-30834-00487

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|--|

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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH**

**FESOP Quarterly Report**

Source Name: Superior Solvents and Chemicals, Inc.  
Source Address: 1030 All Pro Drive, Elkhart, Indiana 46514  
FESOP Permit No.: F039-30834-00487  
Facility: Solvent Truck Loading and Unloading Operation (EU-1)  
Parameter: VOC Emissions  
Limit: VOC emissions from the solvent truck loading and unloading operation (EU-1) shall not exceed 24.90 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions (tons) This Month	VOC Emissions (tons) Previous 11 Months	VOC Emissions (tons) 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 AND ENFORCEMENT BRANCH**

**FESOP Quarterly Report**

Source Name: Superior Solvents and Chemicals, Inc.  
Source Address: 1030 All Pro Drive, Elkhart, Indiana 46514  
FESOP Permit No.: F039-30834-00487  
Facility: Electric Tank Truck Fan Blower  
Parameter: VOC Emissions  
Limit: VOC emissions from the electric tank truck fan blower shall not exceed 24.90 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions (tons) This Month	VOC Emissions (tons) Previous 11 Months	VOC Emissions (tons) 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 AND ENFORCEMENT BRANCH**

**FESOP Quarterly Report**

Source Name: Superior Solvents and Chemicals, Inc.  
 Source Address: 1030 All Pro Drive, Elkhart, Indiana 46514  
 FESOP Permit No.: F039-30834-00487  
 Facility: EU-1, EU-2, EU-3, EU-4, T1 through T12, B2, B3, electric tank truck fan blower, and electric tote fan blower  
 Parameter: Combined VOC Emissions  
 Limit: The combined VOC emissions from the solvent truck loading and unloading operation (EU-1), container filling operation (EU-2), resin container filling operation (EU-3), tote/drum solvent blending operation (EU-4), solvent storage tanks (T1 through T12), and solvent blend tanks (B2 and B3), electric tank truck fan blower, and electric tote fan blower shall not exceed 99.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions (tons) This Month	VOC Emissions (tons) Previous 11 Months	VOC Emissions (tons) 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 AND ENFORCEMENT BRANCH**

**FESOP Quarterly Report**

Source Name: Superior Solvents and Chemicals, Inc.  
 Source Address: 1030 All Pro Drive, Elkhart, Indiana 46514  
 FESOP Permit No.: F039-30834-00487  
 Facility: EU-1, EU-2, EU-3, EU-4, T1 through T12, B2, B3, electric tank truck fan blower, and electric tote fan blower  
 Parameter: Combined worst-case single HAP emissions  
 Limit: The combined worst-case single HAP emissions from the solvent truck loading and unloading operation (EU-1), container filling operation (EU-2), resin container filling operation (EU-3), tote/drum solvent blending operation (EU-4), solvent storage tanks (T1 through T12), and solvent blend tanks (B2 and B3), electric tank truck fan blower, and electric tote fan blower shall not exceed 9.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	Combined Worst-Case Single HAP Emissions (tons) This Month	Combined Worst-Case Single HAP Emissions (tons) Previous 11 Months	Combined Worst-Case Single HAP Emissions (tons) 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 AND ENFORCEMENT BRANCH**

**FESOP Quarterly Report**

Source Name: Superior Solvents and Chemicals, Inc.  
 Source Address: 1030 All Pro Drive, Elkhart, Indiana 46514  
 FESOP Permit No.: F039-30834-00487  
 Facility: EU-1, EU-2, EU-3, EU-4, T1 through T12, B2, B3, electric tank truck fan blower, and electric tote fan blower  
 Parameter: Total combined HAP emissions  
 Limit: The total combined HAP emissions from the solvent truck loading and unloading operation (EU-1), container filling operation (EU-2), resin container filling operation (EU-3), tote/drum solvent blending operation (EU-4), solvent storage tanks (T1 through T12), and solvent blend tanks (B2 and B3), electric tank truck fan blower, and electric tote fan blower shall not exceed 24.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	Total Combined HAP Emissions (tons) This Month	Total Combined HAP Emissions (tons) Previous 11 Months	Total Combined HAP Emissions (tons) 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 AND ENFORCEMENT BRANCH  
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Superior Solvents and Chemicals, Inc.  
 Source Address: 1030 All Pro Drive, Elkhart, Indiana 46514  
 FESOP Permit No.: F039-30834-00487

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, 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".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

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

<b>Source Background and Description</b>
--

<b>Source Name:</b>	<b>Superior Solvents and Chemicals, Inc.</b>
<b>Source Location:</b>	<b>1030 All Pro Drive, Elkhart, IN 46514</b>
<b>County:</b>	<b>Elkhart County</b>
<b>SIC Code:</b>	<b>5169 (Chemicals and Allied Products, NEC)</b>
<b>Permit Renewal No.:</b>	<b>F039-30834-00487</b>
<b>Permit Reviewer:</b>	<b>Jason R. Krawczyk</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Superior Solvents and Chemicals, Inc. relating to the continued operation of a stationary chemical solvents distribution terminal. On August 25, 2011, Superior Solvents and Chemicals, Inc. submitted an application to the OAQ requesting to renew its operating permit. Superior Solvents and Chemicals, Inc. was issued its first FESOP Renewal F043-16483-00487 on June 9, 2003.

<b>Permitted Emission Units and Pollution Control Equipment</b>
---

The source consists of the following permitted emission units:

- (a) One (1) solvent truck loading and unloading operation, identified as EU-1, constructed in 1998, with a maximum capacity of 100 gallons per minute;
- (b) One (1) container filling operation, identified as EU-2, constructed in 1998, with a maximum capacity of 60 gallons per minute, capable of filling drums, totes, and pails with solvents from tanks, or with solvents or resins directly from truck transport;
- (c) One (1) resin container filling operation, identified as EU-3, constructed in 1988, with a maximum capacity of 60 gallons per minute, capable of filling drums, totes, and pails with resins directly from truck transport;
- (d) One (1) tote/drum solvent blending operation, identified as EU-4, constructed in 2011, occurring in a 55-gallon drum and/or tote up to 550 gallons;
- (e) Six (6) vertical fixed roof solvent storage tanks designated T1 through T6, all installed in 1988, with maximum capacities of 10,000 gallons, each, exhausting to vents T1 through T6, respectively;
- (f) Six (6) vertical fixed roof storage tanks, designated as T7 through T12, approved for construction in 2011, with maximum capacities of 10,000 gallons, each, exhausting to vents T7 through T12, respectively;
- (g) One (1) vertical fixed roof solvent blend tank designated B2, approved for construction in 2007, with a maximum capacity of 2,500 gallons;
- (h) One (1) portable solvent blend tank designated B3, approved for construction in 2007, with a maximum capacity of 600 gallons; and
- (i) One (1) tote tank cleaning operation using caustic cleaning agents, constructed in 1988.

- (j) One (1) electric tank truck fan blower, used to blow residual vapor out of tank trucks or storage totes, with a maximum throughput capacity of 5,110 trucks.

The source also consists of the following insignificant activities:

- (a) natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
- (1) Multiple space heaters with a combined heat input capacity of 2.6 MMBtu/hr.
- (b) One (1) electric tote fan blower, used to blow residual vapor out of storage totes, with a maximum throughput capacity of 7,300 totes per year.

#### Existing Approvals

Since the issuance of the FESOP Renewal F043-16483-00487 on June 9, 2003, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. 039-18928-00487 issued on July 20, 2004; and
- (b) Administrative Amendment No. 039-25260-00487 issued on November 1, 2007; and
- (c) Administrative Amendment No. 039-26549-00487 issued on May 30, 2008; and
- (d) Administrative Amendment No. 039-30705-00487 issued on August 30, 2011.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

#### Enforcement Issue

There are no enforcement actions pending.

#### Emission Calculations

See Appendix A of this document for detailed emission calculations.

#### County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective July 19, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.

<sup>1</sup>Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X\*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM<sub>2.5</sub>.

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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 NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
Elkhart County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**  
Elkhart County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### **Fugitive Emissions**

The source's primary operation is a chemical solvents distribution terminal and falls within the Standard Industrial Classification (SIC) Code 5169. In addition to the solvents distribution terminal, the source performs blending of chemicals. The blending of chemicals falls within the SIC Code 2869 and would be considered a chemical process plant<sup>1</sup>. However, the actual blending of chemicals only amounts to approximately 2.5% of the source's total chemical throughput.

EPA introduced the "primary activity" test as a means of discerning the scope of a source with operations falling into separate SIC codes<sup>2</sup>:

Each source is to be classified according to its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Thus, one classification encompasses both primary and support facilities, even when the latter includes units with a different two-digit SIC code.

Since the primary activity is a solvents distribution terminal and the major group SIC code is 51, this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and since there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions from the solvent distribution terminal are not counted toward the determination of PSD and/or Part 70 Permit applicability.

However, for the secondary activity (solvent blending), which is considered one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7 as a chemical process plant, fugitive emissions (from the solvent blending) are counted toward the determination of PSD and/or Part 70 Permit applicability, with a PSD major source threshold (for the solvent blending) of 100 tons per year. The combined uncontrolled/unlimited potential to emit VOC from the tote/drum solvent blending operation (EU-4), vertical fixed roof solvent blend tank (B2), and portable solvent blend tank (B3), is 43.22 tons per year, which is less than the PSD major source threshold of 100 tons per year.

Footnotes:

<sup>1</sup> In the absence of elaboration in the preamble to the Operating Permit Program Rule Final Rule, dated July 21, 1992, the Standard Industrial Classification Manual (SIC Manual), 1987, Executive Office of the President Office of Management and Budget offers some guidance. Chemical process plants are best categorized as Major Group 28.

<sup>2</sup> 45 Fed. Reg. 52676, 52695 (August 7, 1980).

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Pollutant	Potential To Emit (tons/year)
PM	0.02
PM10 <sup>(1)</sup>	0.09
PM2.5	0.09
SO <sub>2</sub>	0.01
NO <sub>x</sub>	1.14
VOC	143.66
CO	0.96
GHGs as CO <sub>2</sub> e	1,375

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Single HAP	Greater than 10
Combined HAPs	Greater than 25

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's VOC emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year.
- (d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the Permittee has agreed to limit the source's single HAP emissions and total HAP emissions below Title V levels. Therefore, the Permittee will be issued a FESOP Renewal.

**Potential to Emit After Issuance**

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM <sub>10</sub> <sup>A</sup>	PM <sub>2.5</sub> <sup>B</sup>	SO <sub>2</sub>	NO <sub>x</sub>	VOC <sup>F</sup>	CO	GHGs <sup>C</sup>	Total HAPs <sup>H</sup>	Worst Single HAP <sup>G</sup>
Natural Gas Combustion	0.02	0.09	0.09	0.01	1.14	0.06	0.96	1,375	0.02	0.02 Hexane
Solvent Truck Loading <sup>D</sup>	-	-	-	-	-	<99.00	-	-	<24.00	<9.00
Container Filling	-	-	-	-	-		-	-		
Resin Container Filling	-	-	-	-	-		-	-		
Storage Tanks	-	-	-	-	-		-	-		
Tank Truck Blower <sup>E</sup>	-	-	-	-	-		-	-		
Tote Blending	-	-	-	-	-		-	-		
Tote Blower	-	-	-	-	-		-	-		
Roadways (Fugitive)	0.62	0.12	0.03	-	-	-	-	-	-	-
<b>Total PTE of Entire Source</b>	<b>0.02</b>	<b>0.09</b>	<b>0.09</b>	<b>0.01</b>	<b>1.14</b>	<b>&lt;99.06</b>	<b>0.96</b>	<b>1,375</b>	<b>&lt;24.02</b>	<b>&lt;9.02</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 as CO <sub>2</sub> e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 as CO <sub>2</sub> e	NA	NA

A Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".  
 B PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.  
 C The 100,000 CO<sub>2</sub>e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.  
 D VOC emissions from the solvent truck loading and unloading operation (EU-1) shall not exceed 24.90 tons per twelve (12) consecutive month period.  
 E VOC emissions from the tank truck blower shall not exceed 24.90 tons per twelve (12) consecutive month period.  
 F The combined VOC emissions from the solvent truck loading and unloading operation (EU-1), container filling operation (EU-2), resin container filling operation (EU-3), tote/drum solvent blending operation (EU-4), solvent storage tanks (T1 through T12), solvent blend tanks (B2 and B3), electric tank truck fan blower, and electric tote fan blower shall not exceed 99.00 tons per twelve (12) consecutive month period.  
 G The combined worst-case single HAP emissions from the solvent truck loading and unloading operation (EU-1), container filling operation (EU-2), resin container filling operation (EU-3), tote/drum solvent blending operation (EU-4), solvent storage tanks (T1 through T12), solvent blend tanks (B2 and B3), electric tank truck fan blower, and electric tote fan blower shall not exceed 9.00 tons per twelve (12) consecutive month period.  
 H The total combined HAP emissions from the solvent truck loading and unloading operation (EU-1), container filling operation (EU-2), resin container filling operation (EU-3), tote/drum solvent blending operation (EU-4), solvent storage tanks (T1 through T12), solvent blend tanks (B2 and B3), electric tank truck fan blower, and electric tote fan blower shall not exceed 24.00 tons per twelve (12) consecutive month period.

(a) FESOP Status

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will continue to be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs will continued to be limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP) and will be issued a FESOP Renewal.

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (a) The combined VOC emissions from the solvent truck loading and unloading operation (EU-1), container filling operation (EU-2), resin container filling operation (EU-3), tote/drum solvent blending operation (EU-4), solvent storage tanks (T1 through T12), solvent blend tanks (B2 and B3), electric tank truck fan blower, and electric tote fan

blower shall not exceed 99.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

- (b) The combined worst-case single HAP emissions from the solvent truck loading and unloading operation (EU-1), container filling operation (EU-2), resin container filling operation (EU-3), tote/drum solvent blending operation (EU-4), solvent storage tanks (T1 through T12), solvent blend tanks (B2 and B3), electric tank truck fan blower, and electric tote fan blower shall not exceed 9.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The total combined HAP emissions from the solvent truck loading and unloading operation (EU-1), container filling operation (EU-2), resin container filling operation (EU-3), tote/drum solvent blending operation (EU-4), solvent storage tanks (T1 through T12), solvent blend tanks (B2 and B3), electric tank truck fan blower, and electric tote fan blower shall not exceed 24.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC and HAPs from all other emission units at this source, shall limit the source-wide total potential to VOC to less than one hundred (100) tons per twelve (12) consecutive month period, any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) not applicable.

- (b) **PSD Minor Source**  
This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

<b>Federal Rule Applicability</b>
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New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60, Subpart Kb (326 IAC 12), are not included in the permit since the individual storage capacities of each of the storage tanks (T1 through T12, B2, and B3) is less than 75 cubic meters (m<sup>3</sup>) (approximately 19,813 gallons).
- (b) The requirements of the New Source Performance Standard for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006, 40 CFR 60, Subpart VV (326 IAC 12), are not included in the permit since the source does not produce as intermediates or final products one or more of the chemicals listed in 40 CFR 60.481. The source is a chemical solvents distribution terminal and is does not produce chemicals.
- (c) The requirements of the New Source Performance Standard for Volatile Organic Compound (VOC) Emissions From the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes, 40 CFR 60, Subpart III (326 IAC 12), are not included in the permit since the source does not produce any of the chemicals listed in 40 CFR 60.617 as a product, co-product, by-product, or intermediate. The source is a chemical solvents distribution terminal and does not produce chemicals.

- (d) The requirements of the New Source Performance Standard for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations, 40 CFR 60, Subpart NNN (326 IAC 12), are not included in the permit since the source does not produce any of the chemicals listed in 40 CFR 60.667 as a product, co-product, by-product, or intermediate. The source is a chemical solvents distribution terminal and does not produce chemicals.
- (e) The requirements of the New Source Performance Standard for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes, 40 CFR 60, Subpart RRR (326 IAC 12), are not included in the permit since the source does not produce any of the chemicals listed in §60.707 as a product, co-product, by-product, or intermediate. The source is a chemical solvents distribution terminal and does not produce chemicals.
- (f) The requirements of the New Source Performance Standard for Bulk Gasoline Terminals, 40 CFR 60, Subpart XX (326 IAC 12), are not included in the permit, because this source is not a bulk gasoline terminal which receives gasoline by pipeline, ship, or barge. The source is a chemical solvents distribution terminal, but does not store or distribute gasoline.
- (g) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (h) The requirements of the National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry, 40 CFR 63, Subpart F (326 IAC 20-11), are not included in the permit since this source does not:
  - 1) Manufacture as a primary product one or more of the chemicals listed in Table 1 to Subpart F of Part 63, Tetrahydrobenzaldehyde, or Crotonaldehyde;
  - 2) Does not use as a reactant or manufacture as a product, or co-product, one or more of the organic hazardous air pollutants listed in Table 2 to Subpart F of Part 63; and
  - 3) Is not a major source as defined in Section 112(a) of the Clean Air Act (CAA).

The source is a chemical solvents distribution terminal and does not produce or manufacture chemicals.
- (i) The requirements of the National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry Process Vents, Storage Vessels, Transfer Operations, and Wastewater, 40 CFR 63, Subpart G (326 IAC 20-11), are not included in this permit since the source is not subject to 40 CFR 63, Subpart F.
- (j) The requirements of the National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks, 40 CFR 63, Subpart H (326 IAC 20-11), are not included in this permit since the source is not subject to the provisions of a specific subpart in 40 CFR 63 that references Subpart H.
- (k) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations), 40 CFR 63, Subpart R (63.420 through 63.429) (326 IAC 20-10), are not included in the permit, because this source is not a bulk gasoline terminal or pipeline breakout station which stores, mixes, or conveys gasoline. The source is a chemical solvents distribution terminal, but does not store or distribute gasoline.

- (l) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Organic Liquids Distribution (Non-Gasoline), 40 CFR 63, Subpart EEEE (63.2330 through 63.2406) (326 IAC 20-83) are not included in the permit, because this source does not store or transfer "organic liquids" as defined by 40 CFR 63.2406 and this source is not a major source of HAPs.
- (m) The requirements of the National Emission Standard for Hazardous Air Pollutants for Miscellaneous Organic Chemical Manufacturing, 40 CFR 63, Subpart FFFF (326 IAC 20-84), are not included in this permit since the source is not located at, or part of, a major source of hazardous air pollutants (HAP) emissions as defined in Section 112(a) of the Clean Air Act (CAA). However, this source does contain miscellaneous organic chemical manufacturing process units (MCPU) that produce an organic chemical classified using the 1987 version of SIC code 282, 283, 284, 285, 286, 287, 289, or 386, or the 1997 version of NAICS code 325, and is not specifically exempted under 40 CFR 63.2435(c). This source primarily stores and distributes solvents under SIC Code 5169 or NAICS 424690. However, this source also blends solvents (approximately 2.5% of the source's total chemical throughput), which would be categorized under SIC code 2869 or NAICS code 325199 (see Note 1 below).

Note 1: Pursuant to Federal Register 72 FR 41113 July 26, 2007 (See also Applicability Determination Index (ADI) Control Number M060034, Memorandum from Michael S. Alushin, EPA Office of Compliance, to John F. Metzger, P.E. of 3M EHS Operations, dated June 6, 2005), the following discussion is included regarding the applicability of 40 CFR part 63, Subpart FFFF, NESHAP for Miscellaneous Organic Chemical Manufacturing (MON rule): "Whether there is chemical reaction during the manufacturing process is not a factor for determining the applicability of the MON rule. Although chemical reaction is typically associated with the manufacture of organic chemicals, it is not exclusively so."

- (n) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities, 40 CFR 63, Subpart BBBB (63.11080 through 63.11100), are not included in the permit, because the source is not considered a bulk gasoline terminal, a pipeline breakout station, a pipeline pumping station, or a bulk gasoline plant as defined in 40 CFR 63.11081.
- (o) The requirements of the National Emission Standard for Hazardous Air Pollutants for Chemical Manufacturing Area Sources, 40 CFR 63, Subpart VVVVVV, are not included in this permit since the source does not operate a chemical manufacturing process unit (CMPU) that uses as feedstocks, generates as byproducts, or produces as products any of the hazardous air pollutants (HAP) listed in Table 1 to Subpart VVVVVV of Part 63 in concentrations greater than 0.1 percent for the listed carcinogens or greater than 1.0 percent for the listed noncarcinogens (see note 1 below for EPA's meaning of "chemical manufacturing" with respect to this rule).

Note 1: Pursuant to the Response to Public Comments for National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources; Proposed Rule (40 CFR 63 Subpart VVVVVV) (October 16, 2009) (Docket ID No. EPA-HQ-OAR-2008-0334-0087), page 3-9, EPA states that "This rule covers material produced by blending, mixing, dilution, or other formulation operations that are described by NAICS 325 and are not a coating operations. General applicability is the same as for subpart FFFF." In addition, on page 3-10, EPA states that "If any blending, heating, or other physical or chemical changes occur, then the operation is chemical manufacturing and subject to the final rule."

- (p) The requirements of the National Emission Standard for Hazardous Air Pollutants for Area Sources: Chemical Preparations Industry, 40 CFR 63, Subpart BBBB (63.11580 through 63.11588), are not included in this permit since the source does not own or operate a "chemical preparations facility" or a "chemical preparations operation in target HAP service" as defined in 40 CFR 63.11588 (see note 1 below).

Note 1: Pursuant to in 40 CFR 63.11588, a chemical preparations facility consists the facility-wide collection of chemical preparation operations, including mixing, blending, milling, and extruding equipment used to manufacture chemical preparations. Chemical preparation means a target

HAP-containing product, or intermediate use in the manufacture of other products, manufacture in a process operation described by the NAICS code 325998. Target HAP-containing means raw materials, intermediates, or products that contain one or more target HAP. Any material that contains compounds of chromium (VI), lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), or manganese or chromium (III) compounds in amounts greater than or equal to 1.0 percent by weight (as the metal) is considered to be target HAP-containing. In target HAP service means that equipment in the chemical preparation operation either contains, contacts, or is processing target HAP-containing materials.

- (q) The requirements of the National Emission Standard for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing, 40 CFR 63, Subpart CCCCCC (326 IAC 20), are not included in this permit since the source does not own or operate a facility that performs paints and allied products manufacturing. The source is a chemical solvents distribution terminal and does not perform paints and allied products manufacturing as defined by 40 CFR 63.11607. Pursuant the definitions under 40 CFR 63.11607, the blending of solvents at this source would not be considered "paints and allied products manufacturing", since the blended solvent, is not considered a "paint and allied product" and, if applied to a substrate, would not leave a dried film of solid material on the substrate.
- (r) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

#### Compliance Assurance Monitoring (CAM)

- (s) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

<b>State Rule Applicability</b>
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- (a) 326 IAC 1-6-3 (Preventive Maintenance Plan)  
The source is subject to 326 IAC 1-6-3.
- (b) 326 IAC 2-8-4 (FESOP)  
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the Renewal section above.
- (c) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the Renewal section above.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The requirements of 326 IAC 2-4.1, apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997. The source was constructed in 1988, prior to the July 27, 1997 applicability date and none of those units have been reconstructed. Therefore, all existing units constructed prior to the 1997 applicability date are not subject to the requirements of 326 IAC 2-4.1

B2 and B3 were constructed in 2007, T6 through T12 and the one (1) tote/drum blending operation were constructed in 2011; however, in and of themselves, each unit constructed after 1997 does not have the potential to emit ten (10) tons per year of any HAP or twenty-five (25) tons per year of any combination of HAP, nor do they meet the criteria identified in (2)(i) through (vi) in the definition of "Construct a Major Source", under 40 CFR 63.41. Therefore the requirements of 326 2-4.1 are not applicable.

- (e) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)  
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:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) 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.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.
- (h) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

#### Solvent Truck Loading / Unloading (EU-1)

- (j) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)  
The unlimited potential emissions from the solvent truck loading and unloading operation, identified as EU-1, are greater than twenty-five (25) tons per year. However, the source shall limit the VOC potential emissions from EU-1 to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

In order to render the requirements of 326 IAC 8-1-6 not applicable, VOC emissions from the solvent truck loading and unloading operation (EU-1), shall not exceed 24.90 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit the VOC emissions from the solvent truck loading and unloading operation to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

#### Container Filling Operation (EU-2)

- (k) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)  
The container filling operation (EU-2) is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions is less than twenty-five (25) tons per year.

Resin Container Filling Operation (EU-3)

- (l) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)  
The resin container filling operation (EU-3) is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions is less than twenty-five (25) tons per year.

Tote/Drum Solvent Blending (EU-4)

- (m) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)  
The tote/drum solvent blending operation (EU-4) is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions is less than twenty-five (25) tons per year.

Storage Tanks (T1-T12) / Blending Tanks (B2 & B3)

- (n) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Each of the storage and blending tanks is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each unit is less than twenty-five (25) tons per year.
- (o) 326 IAC 8-4-3 (Petroleum Sources; Petroleum Liquid Storage Facilities)  
Pursuant to 326 IAC 8-4-1(c) and 326 IAC 8-4-3(a), each of the storage vessels at this source is not subject to the requirements of 326 IAC 8-4-3, since they each do not store petroleum liquids.
- (p) 326 IAC 8-6 (VOC Rules: Organic Solvent Emission Limitations)  
Pursuant to 326 IAC 8-6-1, this rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. Pursuant to 326 IAC 8-6-1, this source is not subject to the requirements 326 IAC 8-6, because this source, which is located in Elkhart County, did not commence operation after October 7, 1974 and prior to January 1, 1980, and each emission unit would otherwise be regulated by 326 IAC 8-1-6.
- (q) 326 IAC 8-7 (VOC Rules; Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)  
Pursuant to 326 IAC 8-7-2(a), this source is not subject to the requirements of 326 IAC 8-7, since it is not located in Lake, Porter, Clark, or Floyd County.
- (r) 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)  
This rule applies to stationary vessels used to store volatile organic liquid (VOL) that are located in Clark, Floyd, Lake, or Porter County. This source is located in Elkhart County. Therefore, the requirements of 326 IAC 8-9 are not applicable to the storage tanks or blending tanks located at the source.
- (s) 326 IAC 8-15 (VOC Rules; Standards for Consumer and Commercial Products)  
Pursuant to 326 IAC 8-15, this source is not subject to the requirements of 326 IAC 8-15, because this source does not sell, supply, offer for sale, or manufacture any "consumer products" (chemically formulated product used by household and institutional consumers) as defined by 326 IAC 8-15-2.
- (t) 326 IAC 8-18 (VOC Rules; Synthetic Organic Chemical Manufacturing Industry Air Oxidation, Distillation, and Reactor Processes)  
Pursuant to 326 IAC 8-18-1, this source is not subject to the requirements of 326 IAC 8-18, since it is not located in Lake or Porter County, and does not contain any air oxidation unit processes, distillation operations, and reactor processes as defined by 326 IAC 8-18-1(b).

- (u) 326 IAC 8-19 (VOC Rules; Control of Volatile Organic Compound Emissions from Process Vents in Batch Operations)  
Pursuant to 326 IAC 8-19-1, this source is not subject to the requirements of 326 IAC 8-19, since this source is not located in Lake or Porter County and the potential to emit VOC is limited to less than one hundred (100) tons per year. However, this source also blends solvents (approximately 2.5% of the source's total chemical throughput), which would have a batch process train categorized under SIC Code 2869.

#### Electric Tank Blower

- (v) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)  
The unlimited potential emissions from the electric tank blower, are greater than twenty-five (25) tons per year. However, the source shall limit the VOC potential emissions from the electric tank blower to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

In order to render the requirements of 326 IAC 8-1-6 not applicable, VOC emissions from the electric tank blower, shall not exceed 24.90 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit the VOC emissions from the electric tank blower to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

#### Electric Tote Blower

- (w) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)  
The electric tote blower is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions are less than twenty-five (25) tons per year.

#### Natural Gas Combustion

- (x) 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)  
Each of the natural gas-fired space heaters is not subject to the requirements of 326 IAC 6-2, because they each are not an indirect heating unit.
- (y) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Each of the natural gas-fired space heaters at this source is exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. In addition, pursuant to 326 IAC 6-3-1(b)(14), each of the natural gas-fired radiant space heaters and air makeup units at this source is also exempt from the requirements of 326 IAC 6-3, because they each have potential particulate emissions of less than five hundred fifty one thousandths (0.551) pound per hour.
- (z) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)  
Pursuant to 326 IAC 7-1.1-1, each of the natural gas-fired heaters at this source is not subject to the requirements of 326 IAC 7-1.1, since each has unlimited sulfur dioxide (SO<sub>2</sub>) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.
- (aa) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Each of the natural gas-fired heaters at this source is not subject to the requirements of 326 IAC 8-1-6, since the potential unlimited VOC emissions from each unit is less than twenty-five (25) tons per year.

## Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements 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 appropriate corrective actions within a specific time period.

(a) The compliance determination requirements applicable to this source are:

- (1) 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:
  - (A) For bulk transfers: date, receipt number, product name, amount in pounds, specific gravity, input location, and output location.
  - (B) 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).
  - (C) For blending tank operations: date, receipt number, product name, amount in pounds, specific gravity, time of blend, duration of blend.
- (2) 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.
- (3) 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.
- (4) VOC and HAP emissions calculations shall be performed for the following equipment and operations:
  - (A) Solvent Loading;
  - (B) Container Filling and Blending operations, and
  - (C) Storage Tanks.

- (5) Emissions of each VOC and HAP generated by the solvent truck loading and unloading operation (EU-1), container filling operation (EU-2), resin container filling operation (EU-3), and the loading of solvent into the tote/drum solvent blend operation (EU-4) shall be calculated using the following formula (AP-42, Chapter 5.2):

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

E = pounds of VOC or HAP emissions per 1000 gallons of liquid loaded;  
S = saturation factor (0.5 for submerged loading, 1.45 for splash loading);  
P = vapor pressure of VOC or HAP in liquid (psia);  
M = molecular weight of VOC or HAP in liquid (lb/lb mole);  
T = temperature of liquid loaded (°Rankin).

- (6) Emissions of each VOC and HAP from mixing of solvents in the tote/drum solvent blend operation (EU-4) shall be calculated using the following formula (Emission Inventory Improvement Program (EIIP), Volume II, Chapter 8):

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

E = emissions in pounds per batch  
T = temperature of liquid mixed in tank (°Rankin)  
M = molecular weight of VOC or HAP in liquid (lb/lb-mole)  
P = vapor pressure of VOC or HAP in liquid (psia)  
A = surface area of liquid in tank (84 ft<sup>2</sup>)  
H = batch time (hrs)  
K<sub>x</sub> = gas phase mass transfer coefficient of VOC or HAP in liquid  
 $K_x = 0.00438 * (U^{0.78}) * (18/M)^{1/3}$   
U = wind speed = 0.1 mph  
R = universal gas constant at 1 atmosphere of pressure = 10.73 psia-ft<sup>3</sup>/°R-lb-mol

- (7) VOC and HAP emissions from the electric blowers shall be calculated using the following formulas:

$$\text{VOC (tons/yr)} = \frac{T * G_{\text{VOC}} * W_{\text{VOC}} * D}{2000 \text{ pounds/ton}}$$

Where:

T = Number of cargo tanks dried per twelve (12) consecutive month period

G<sub>VOC</sub> = Gallons of VOC containing material remaining in each cargo tank or tote to be dried  
= 1.46 gallons for each cargo tank  
= 0.126 gallons for each tote

W<sub>VOC</sub> = Weight percent of VOC in material remaining in each cargo tank or tote to be dried

D = Density of material remaining in each cargo tank or tote to be dried (lbs/gallon)

$$\text{Single HAP (tons/yr)} = \frac{T * G_{\text{HAP}} * W_{\text{SHAP}} * D}{2000 \text{ pounds/ton}}$$

Where:

T = Number of cargo tanks/totes dried per twelve (12) consecutive month period

G<sub>HAP</sub> = Gallons of HAP containing material remaining in each cargo tank or tote to be dried  
= 1.46 gallons for each cargo tank  
= 0.126 gallons for each tote

W<sub>SHAP</sub> = Weight percent of each HAP in material remaining in each cargo tank or tote to be dried

D = Density of material remaining in each cargo tank or tote to be dried (lbs/gallon)

$$\text{Total HAPs (tons/yr)} = \frac{T * G_{HAP} * W_{THAP} * D}{2000 \text{ pounds/ton}}$$

Where:

T = Number of cargo tanks/totes dried per twelve (12) consecutive month period

G<sub>HAP</sub> = Gallons of HAP containing material remaining in each cargo tank or tote to be dried  
= 1.46 gallons for each cargo tank  
= 0.126 gallons for each tote

W<sub>THAP</sub> = Weight percent of combined HAPs in material remaining in each cargo tank or tote to be dried

D = Density of material remaining in each cargo tank or tote to be dried (lbs/gallon)

- (8) For the purpose of HAP emission calculations, 100% of HAP content in solvents shall be accounted for as HAP emissions.
- (9) Storage Tanks emissions shall be calculated using EPA's TANKS program (version 4.09d or most current version).
- (10) 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.

**Note:** These are new requirements. These are Title I changes.

- (b) There are no testing requirements applicable to this source.

### Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. Applications for the purpose of this review were received on August 25, 2011.

The operation of this source shall be subject to the conditions of the attached proposed FESOP Renewal No. F039-30834-00487. The staff recommends to the Commissioner that this FESOP Renewal be approved.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Jason R. Krawczyk at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5174 or toll free at 1-800-451-6027 extension4-5174.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

**Appendix A: Emissions Calculations**  
Emission Summary

Company Name: Superior Solvents and Chemicals, Inc.  
Address City IN Zip: 1030 All Pro Drive, Elkhart, IN 46514  
Permit Number: F039-30834-00487  
Pit ID: 039-00487  
Reviewer: Jason R. Krawczyk  
Date: April 9, 2012

Uncontrolled / Unlimited Emissions (Tons/Yr)										
Pollutant	Natural Gas Combustion	Solvent Truck Loading (EU-1)	Container Filling Operation (EU-2)	Resin Container Filling Operation (EU-3)	Tanks (T1-T12, B2, B3)	Tank Truck Blower	Tote Blending (EU-4)	Tote Blower	Paved Roadways (Fugitive)	Total
PM	0.02	-	-	-	-	-	-	-	-	0.02
PM10	0.09	-	-	-	-	-	-	-	-	0.09
PM2.5	0.09	-	-	-	-	-	-	-	-	0.09
VOC	0.06	34.96	20.97	1.52	33.49	27.04	22.28	3.33	-	143.66
NOx	1.14	-	-	-	-	-	-	-	-	1.14
SO2	0.01	-	-	-	-	-	-	-	-	0.01
CO	0.96	-	-	-	-	-	-	-	-	0.96
GHGs as CO2e	1,375	-	-	-	-	-	-	-	-	1,375
Single HAP (Toluene)	3.87E-05	12.36	7.42	1.52	2.92	27.04	-	3.33	-	54.60
Combined HAPs	0.02	12.36	7.42	1.52	14.42	27.04	6.57	3.33	-	72.69

Uncontrolled / Limited Emissions (Tons/Yr)										
Pollutant	Natural Gas Combustion	Solvent Truck Loading (EU-1) <sup>A</sup>	Container Filling Operation (EU-2)	Resin Container Filling Operation (EU-3)	Tanks (T1-T12, B2, B3)	Tank Truck Blower <sup>B</sup>	Tote Blending (EU-4)	Tote Blower	Paved Roadways (Fugitive)	Total
PM	0.02	-	-	-	-	-	-	-	-	0.02
PM10	0.09	-	-	-	-	-	-	-	-	0.12
PM2.5	0.09	-	-	-	-	-	-	-	-	0.09
VOC <sup>C</sup>	0.06	-	-	-	99.00	-	-	-	-	99.06
NOx	1.14	-	-	-	-	-	-	-	-	1.14
SO2	0.01	-	-	-	-	-	-	-	-	0.01
CO	0.96	-	-	-	-	-	-	-	-	0.96
GHGs as CO2e	1,375	-	-	-	-	-	-	-	-	1,375
Single HAP <sup>D</sup>	0.02	-	-	-	9.00	-	-	-	-	9.02
Combined HAPs <sup>E</sup>	0.02	-	-	-	24.00	-	-	-	-	24.02

**Notes:**

- A- In order to render the requirements of 326 IAC 8-1-6 not applicable, the VOC emissions from the solvent truck loading and unloading operation (EU-1) shall not exceed 24.90 tons per twelve (12) consecutive month period.
- B- In order to render the requirements of 326 IAC 8-1-6 not applicable, the VOC emissions from the tank truck blower shall not exceed 24.90 tons per twelve (12) consecutive month period.
- C- The combined VOC emissions from the solvent truck loading and unloading operation (EU-1), container filling operation (EU-2), resin container filling operation (EU-3), tote/drum solvent blending operation (EU-4), solvent storage tanks (T1 through T12), solvent blend tanks (B2 and B3), electric tank truck fan blower, and electric tote fan blower shall not exceed 99.00 tons per twelve (12) consecutive month period.
- D- The combined worst-case single HAP emissions from the solvent truck loading and unloading operation (EU-1), container filling operation (EU-2), resin container filling operation (EU-3), tote/drum solvent blending operation (EU-4), solvent storage tanks (T1 through T12), solvent blend tanks (B2 and B3), electric tank truck fan blower, and electric tote fan blower shall not exceed 9.00 tons per twelve (12) consecutive month period.
- E- The total combined HAP emissions from the solvent truck loading and unloading operation (EU-1), container filling operation (EU-2), resin container filling operation (EU-3), tote/drum solvent blending operation (EU-4), solvent storage tanks (T1 through T12), solvent blend tanks (B2 and B3), electric tank truck fan blower, and electric tote fan blower shall not exceed 24.00 tons per twelve (12) consecutive month period.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
Space Heaters**

**Company Name: Superior Solvents and Chemicals, Inc.**  
**Address City IN Zip: 1030 All Pro Drive, Elkhart, IN 46514**  
**Permit Number: F039-30834-00487**  
**Plt ID: 039-00487**  
**Reviewer: Jason R. Krawczyk**  
**Date: April 9, 2012**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
2.6	1000	22.8
space heaters, total combined		

Criteria Pollutants	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.02	0.09	0.09	0.01	1.14	0.06	0.96

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
 PM2.5 emission factor is filterable and condensable PM2.5 combined.  
 \*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology:**

All emission factors are based on normal firing.  
 MMBtu = 1,000,000 Btu  
 MMCF = 1,000,000 Cubic Feet of Gas  
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Hazardous Air Pollutants**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.39E-05	1.37E-05	8.54E-04	2.05E-02	3.87E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	5.69E-06	1.25E-05	1.59E-05	4.33E-06	2.39E-05

The five highest organic and metal HAPs emission factors are provided above. **Combined HAPs (tons/yr) 0.02**  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Greenhouse Gases**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	1,367	0.026	0.025
Summed Potential Emissions in tons/yr	1,367		
CO2e Total in tons/yr	1,375		

**Methodology:**

The N2O Emission Factor for uncontrolled is 2.2.  
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.  
 Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton  
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emission Calculations**  
**Emissions from Solvent Truck Loading Operations (EU-1)**

**Company Name:** Superior Solvents and Chemicals, Inc.  
**Address City IN Zip:** 1030 All Pro Drive, Elkhart, IN 46514  
**Permit Number:** F039-30834-00487  
**Plt ID:** 039-00487  
**Reviewer:** Jason R. Krawczyk  
**Date:** April 9, 2012

**Loading Losses (based on AP-42 5th Edition, Section 5.2)**

$EF = 12.46 * S * P * M / T$                       where: EF = loading loss (lb/kgal)  
 S = saturation factor  
 P = true vapor pressure (psia)  
 M = molec. wt. of vapor  
 T = temperature of liquid loaded (R)

**Potential Emissions from Solvent Truck Loading**

Material Loaded	Maximum Throughput gal/min	Maximum Throughput kgal/hr	S Saturation Factor (S)	M MW lb/lb-mole	T Temperature R	P TVP psi	EF AP-42 Emission Factor (lb/kgal) 12.46xS x M x P/T	Maximum Uncontrolled Loading Losses	
								(lbs/hr)	(tons/yr)
Worst Case VOC	100	6.0	0.50	72.11	537.00	1.59	1.3302	7.98	<b>34.96</b>
Worst Case HAP	100	6.0	0.50	92.14	537.00	0.44	0.4703	2.82	<b>12.36</b>

**Notes:**  
 Emission factor in pounds per thousand gallons loaded, based on AP-42, Table 5.2-1, 5th Ed, 1995.

**Methodology:**  
 Maximum Uncontrolled Loading Losses (lb/hr) = EF \* Maximum Throughput (kgal/hr)  
 Maximum Uncontrolled Loading Losses (tons/yr) = Maximum Uncontrolled Loading Losses (lb/hr) \* 8,760 hrs / 2,000 lbs

**Appendix A: Emission Calculations  
Emissions from Container Filling Operations (EU-2)**

**Company Name: Superior Solvents and Chemicals, Inc.  
Address City IN Zip: 1030 All Pro Drive, Elkhart, IN 46514  
Permit Number: F039-30834-00487  
Plt ID: 039-00487  
Reviewer: Jason R. Krawczyk  
Date: April 9, 2012**

**Loading Losses (based on AP-42 5th Edition, Section 5.2)**

$EF = 12.46 * S * P * M / T$

where: EF = loading loss (lb/kgal)  
S = saturation factor  
P = true vapor pressure (psia)  
M = molec. wt. of vapor  
T = temperature of liquid loaded (R)

**Potential Emissions from Solvent Drum Loading**

Material Loaded	Maximum Throughput gal/min	Maximum Throughput (kgal/hr)	S Saturation Factor (S)	M MW lb/lb-mole	T Temperature R	P TVP psi	EF AP-42 Emission Factor (lb/kgal) 12.46xS x M x P/T	Maximum Uncontrolled Loading Losses	
								(lbs/hr)	(tons/yr)
Worst Case VOC	60	3.6	0.50	72.11	537.00	1.59	1.3302	4.79	<b>20.97</b>
Worst Case HAP	60	3.6	0.50	92.14	537.00	0.44	0.4703	1.69	<b>7.42</b>

**Notes:**

Emission factor in pounds per thousand gallons loaded, based on AP-42, Table 5.2-1, 5th Ed, 1995.

**Methodology:**

Maximum Uncontrolled Loading Losses (lb/hr) = EF \* Maximum Throughput (kgal/hr)

Maximum Uncontrolled Loading Losses (tons/yr) = Maximum Uncontrolled Loading Losses (lb/hr) \* 8,760 hrs / 2,000 lbs



**Appendix A: Emission Calculations  
VOC and HAP Emissions from Tanks**

**Company Name: Superior Solvents and Chemicals, Inc.**  
**Address City IN Zip: 1030 All Pro Drive, Elkhart, IN 46514**  
**Permit Number: F039-30834-00487**  
**Plt ID: 039-00487**  
**Reviewer: Jason R. Krawczyk**  
**Date: April 9, 2012**

**Volatile Organic Compounds**

Tank ID	Worst Case VOC Product Stored*	VOC Losses (lbs/year)			VOC Losses (tons/year)		
		Standing/Breathing/Blending Losses	Working Losses	Total	Standing/Breathing/Blending Losses	Working Losses	Total
T1	MEK	85.0	687.0	772.0	0.043	0.34	0.39
T2	MEK	85.0	687.0	772.0	0.043	0.34	0.39
T3	MEK	85.0	687.0	772.0	0.043	0.34	0.39
T4	MEK	85.0	687.0	772.0	0.043	0.34	0.39
T5	MEK	85.0	687.0	772.0	0.043	0.34	0.39
T6	MEK	85.0	687.0	772.0	0.043	0.34	0.39
T7	Hexane	225.5	3184.1	3409.7	0.113	1.59	1.70
T8	Hexane	225.5	3184.1	3409.7	0.113	1.59	1.70
T9	Hexane	225.5	3184.1	3409.7	0.113	1.59	1.70
T10	Hexane	225.5	3184.1	3409.7	0.113	1.59	1.70
T11	Hexane	225.5	3184.1	3409.7	0.113	1.59	1.70
T12	Hexane	225.5	3184.1	3409.7	0.113	1.59	1.70
B-2	Solvent Blend (91% VOC)	11205.2	17762.4	28967.6	5.60	8.88	14.48
B-3	Thinner (91% VOC)	8224.0	4697.3	12921.3	4.11	2.35	6.46
						<b>Total VOC</b>	<b>33.49</b>

**Notes:**

\*Maximum potential VOC emissions using the solvent methyl ethyl ketone (MEK) as the "worst case" operating scenario.  
 All storage tank emissions estimated using USEPA's Tanks 4.09 software program and are based on the maximum annual throughput for each solvent.

**Hazardous Air Pollutants**

Tank ID	Worst Case HAP Product Stored	HAP Losses (lbs/year)			HAP Losses (tons/year)		
		Standing/Breathing/Blending Losses	Working Losses	Total	Standing/Breathing/Blending Losses	Working Losses	Total
T1	Toluene	43.0	243.0	286.0	0.022	0.12	0.14
T2	Toluene	43.0	243.0	286.0	0.022	0.12	0.14
T3	Toluene	43.0	243.0	286.0	0.022	0.12	0.14
T4	Toluene	43.0	243.0	286.0	0.022	0.12	0.14
T5	Toluene	43.0	243.0	286.0	0.022	0.12	0.14
T6	Toluene	43.0	243.0	286.0	0.022	0.12	0.14
T7	Hexane	225.5	3184.1	3409.7	0.113	1.59	1.70
T8	Hexane	225.5	3184.1	3409.7	0.113	1.59	1.70
T9	Hexane	225.5	3184.1	3409.7	0.113	1.59	1.70
T10	Hexane	225.5	3184.1	3409.7	0.113	1.59	1.70
T11	Hexane	225.5	3184.1	3409.7	0.113	1.59	1.70
T12	Hexane	225.5	3184.1	3409.7	0.113	1.59	1.70
B-2	Solvent Blend (4% Xylene)	492.5	780.8	1273.3	0.246	0.39	0.64
B-3	Thinner (9% Methanol)	813.4	464.6	1277.9	0.407	0.23	0.64
	Thinner (29% Toluene)	2620.8	1496.9	4117.8	1.310	0.75	2.06
						<b>Total Toluene</b>	<b>2.92</b>
						<b>Total Hexane</b>	<b>10.23</b>
						<b>Total Xylene</b>	<b>0.64</b>
						<b>Total Methanol</b>	<b>0.64</b>
						<b>Total Combined HAPs</b>	<b>14.42</b>

**Notes:**

\*\*Maximum potential HAP emissions using the solvent toluene as the "worst case" operating scenario.

**Appendix A: Emission Calculations  
Emissions from Tote Blower**

**Company Name:** Superior Solvents and Chemicals, Inc.  
**Address City IN Zip:** 1030 All Pro Drive, Elkhart, IN 46514  
**Permit Number:** F039-30834-00487  
**Plt ID:** 039-00487  
**Reviewer:** Jason R. Krawczyk  
**Date:** April 9, 2012

Emission Unit	Worst-Case Material in Tote	Maximum Throughput (Trucks/yr)	Emission Factor (Gal/Truck)	Density (lb/gal)	Potential VOC & HAP Emissions	
					(lbs/yr)	(tons/yr)
Electric Truck Blower	Toluene	5,110	1.46	7.25	54089.35	<b>27.04</b>

**Process Description:**

The blower gives the facility the ability to dry 1 cargo tank at a time or 5 portable totes or a combination of both. The unit consists of a raised fan located in outdoors. The fan blows ambient air through a network of 5 flexible hoses. Hoses are placed inside the vessel to be blown dry. The calcs above are based on drying 5 cargo tank compartments at a time. This provides a worse case scenario.

VOC Emissions are equal to the VOC content (assumed 100% based on density in lb/gal) \* 1.460 gallons/cargo tank  
 Assumed toluene (higher Specific Gravity) for conservative average

**Tank Emission Factor:**

**Cargo Tank Capacity:** 6,350 gallons (when empty contains 1.460 gallons of residue)

\*\*\* Cargo tanks to be dried are empty of product, only residue remains. \*\*\*

**Average Dry Time:** 1.5 hours

**Down time between trucks:** 15 minutes, 0.25 hours (Trailer switch-out, staging, etc.)

**During 24 hour Period:** 1.5 hours per tote

0.25 hour Staging / Switch-Out

1.75 hours process time per Tote (24 hours / 1.75 hrs. ≈ 13.71 Totes processed / 24 hr. period)

**# Cargo Tanks Dried per year:** (14 per day) \* (365 days/year) = **5,110 trucks/year**

**# Cargo Tank Blower at the Facility:** (1 Blowers)\* (5,110 Cargo Tanks / year) = **5,110 tanks dried / year**

**Notes:**

Blower calculations are based on test data. The average amount of residual material in trucks over three test runs was 1.460 gallons. Blower emissions at all Superior facilities are based on this data.

**Appendix A: Emission Calculations**  
**Emissions from Tote/Drum Blending Operation (EU-4)**

Company Name: Superior Solvents and Chemicals, Inc.  
 Address City IN Zip: 1030 All Pro Drive, Elkhart, IN 46514  
 Permit Number: F039-30834-00487  
 Plt ID: 039-00487  
 Reviewer: Jason R. Krawczyk  
 Date: April 9, 2012

**Scale 1**

Output Product Name	Qty (lb)	Density (lb/gal)	Qty (gal)	T (*Rankine)	M (lb/lb-mole)	P (psia)	S Saturation Factor	Batch Time (min)	Kx	Loading Emissions (lbs)	Blending Emissions (lbs)	Total Emissions (lbs)	Total Emissions (tons)
Impact Tire Dressing	36,149,600	6.19	5,840,000	530	92	1.2	1.45	525,600	0.00042199	21,978.20	21,701.10	43,679.30	21.84
Contains: Hexane >9% Heptane >29 %	81% Volatile												
<b>VOC Emissions:</b>												35,380.23	17.69
<b>HAP Emissions:</b>												8,735.86	4.37

81% Volatile  
20% Hexane (Max)

**Scale 2**

COR VE 8115 Vinyl Ester Resin	56,648,000	9.70	5,840,000	530	308.51	0.09	1.45	525,600	0.00028193	5,527.58	3,646.40	9,173.97	4.59
Contains: Resin 52.5% Styrene 48%	100% Volatile												
<b>VOC Emissions:</b>												9,173.97	4.59
<b>HAP Emissions:</b>												4,403.51	2.20
Total VOC Emissions												22.28	
Total HAP Emissions												6.57	

100% Volatile  
48% Styrene

**Notes:**

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

**Operating Schedule used to Calculate PTE:**

24 hours / day, 7 days / week, 365 days / year

**Pump Capacity:** 75 gpm standard fill rate  
 pump is rated for 100 gpm

**Cycle Time (to complete a blend in a 500 gallon tote)**

15 min. Fill Time (Includes time to fill multiple products)  
 15 min. Blend Time (Mechanical or Air Mixer, Sampling, Lab QA / QC)  
 15 min. Empty Time (Drum Prep, Labeling, Staging, Fill, etc.)  
 45 min. Total  
 45 min / 60 min./hour = 0.75 hrs per cycle

Data source: Chempax software

# Cycles per Day per Scale:  $\frac{24 \text{ hours} / \text{day}}{0.75 \text{ hours} / \text{cycle}} = 32 \text{ cycles} / \text{day}$

**Mixing Emissions:**

$E = M * Kx * A * P * 3600 * H / (R * T)$   
 E = emission in pounds  
 T = Temp (Rankine) = 530  
 M = Mol. Wt (lb/lb-mole)  
 P = Vapor pressure (psia)  
 A = Area of tank (84 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

**Annual Throughput:** 32 cycles / day \* 500 gallons / cycle = 16,000 gallons Blended in Totes per Day per Scale

16,000 gallons / Day \* 365 Days / Year = 5,840,000 gallons blended in Totes per Year per Scale

\*\*\* Product may be blended in 55-gallon drums, but 500 gallon tote batches represents the worst case scenario. PTE is based on this. \*\*\*

**Annual Blend Time:** 11,680 cycles / year \* 45 minutes / cycle = 525,600 min./year ≈ 8,760 hours

**Surface Area Calculations:** 42" X 42" X 51" or 3.5 ft. X 3.5 ft. X 4.25 ft.

Surface Area = 2(Length \* Width + Length\*Height + Width\*Height)

2 (3.5' \* 3.5' + 3.5' \* 4.25' + 3.5' \* 4.25')

Internal Surface area of a 550 gallon Tote ≈ 83.98 square feet

VOC Emissions (tons/yr) = Total Emissions (lbs) \* % Volatile \* 1 ton / 2,000 lbs

HAP Emissions (tons/yr) = Total Emissions (lbs) \* % HAP \* 1 ton / 2,000 lbs

Total VOC/HAP Emissions (tons/yr) = Scale 1 Emissions (tons/yr) + Scale 2 Emissions (tons/yr)

**Appendix A: Emission Calculations  
Emissions from Tote Blower**

**Company Name: Superior Solvents and Chemicals, Inc.**  
**Address City IN Zip: 1030 All Pro Drive, Elkhart, IN 46514**  
**Permit Number: F039-30834-00487**  
**Plt ID: 039-00487**  
**Reviewer: Jason R. Krawczyk**  
**Date: April 9, 2012**

Emission Unit	Worst-Case Material in Tote	Maximum Throughput (Totes/yr)	Emission Factor (Gal/Tote)	Density (lb/gal)	Potential VOC & HAP Emissions	
					(lbs/yr)	(tons/yr)
Electric Tote Blower	Toluene	7300	0.126	7.25	6668.55	<b>3.33</b>

*based on 550 gallon tote*

**Process Description:**

The tote blower gives the facility the ability to dry 1 tote tank at a time. This unit consists of a raised fan located indoors. The fan blows ambient air through a flexible hose which is placed inside the vessel to be blown dry.

**Tote Emission Factor:**

**Tote Capacity:** 550 gallons (largest tote, totes range in size)

**Average Dry Time:** 1 hour / tote

**During 24 hour Period:** 1 hour per tote

0.25 hour Staging / Switch-Out

1.25 hours process time per Tote (24 hours / 1.25 hrs. ≈ 19.2 Totes processed / 24 hr. period)

**# Tote Tanks Dried per year:** (20 per day) \* (365 days/year) = **7,300 totes/year**

*VOC Emissions are equal to: 550 gallons / 6,350 gallons = .086 \*100 = 8.6% of the capacity of a cargo tank*

*Cargo Tank Emissions Factor (1.460 gallons \* 0.086) = **0.126 gallons residue / Tote***

**Notes:**

Blower calculations are based on test data. The average amount of residual material in trucks over three test runs was 1.460 gallons. Blower emissions at all Superior facilities are based on this data.

**Appendix A: Emission Calculations**  
**Fugitive Dust Emissions - Paved Roads**

**Company Name:** Superior Solvents and Chemicals, Inc.  
**Source Address:** 1030 All Pro Drive, Elkhart, IN 46514  
**Permit Number:** F039-30834-00487  
**Source ID:** 039-00487  
**Reviewer:** Jason R. Krawczyk  
**Date:** April 9, 2012

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011)

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle Type 1 (entering plant) (one-way trip)	30.0	30.0	900.0	2.0	1800.0	156	0.030	26.6	9705.7
Vehicle Type 1 (leaving plant) (one-way trip)	30.0	30.0	900.0	2.0	1800.0	156	0.030	26.6	9705.7
Vehicle Type 2 (entering plant) (one-way trip)	15.0	15.0	225.0	40.0	9000.0	586	0.111	25.0	9114.6
Vehicle Type 2 (leaving plant) (one-way trip)	15.0	15.0	225.0	40.0	9000.0	586	0.111	25.0	9114.6
<b>Total</b>			<b>2250.0</b>		<b>21600.0</b>			<b>103.1</b>	<b>37640.6</b>

**Vehicle Type #1** Passenger Vehicles, average weight 4,000 lbs.  
 Avg. 20 employees/day + UPS, mail, cust p/ups, etc.  
 (≈ 30/day)

**Vehicle Type #2** Commercial Vehicles, Tractor/Trailers 80,000 lbs. gross  
 Avg. 15 /day (Incl. Superior trucks, trash/fuel trucks)

Average Vehicle Weight Per Trip =  tons/trip  
 Average Miles Per Trip =  miles/trip

Unmitigated Emission Factor, Ef = [k \* (sL)<sup>0.91</sup> \* (W)<sup>1.02</sup>] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	9.6	9.6	9.6	tons = average vehicle weight (provided by source)
sL =	0.6	0.6	0.6	g/m <sup>2</sup> = ubiquitous baseline silt loading value for ADT < 500 - Table 13.2.1-2

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E \* [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = Ef \* [1 - (p/4N)]

where p =  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
 N =  days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.069	0.014	0.0034	lb/mile
Mitigated Emission Factor, Eext =	0.063	0.013	0.0031	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle Type 1 (entering plant) (one-way trip)	0.34	0.07	0.02	0.31	0.06	0.02
Vehicle Type 1 (leaving plant) (one-way trip)	0.34	0.07	0.02	0.31	0.06	0.02
Vehicle Type 2 (entering plant) (one-way trip)	0.32	0.06	0.02	0.29	0.06	0.01
Vehicle Type 2 (leaving plant) (one-way trip)	0.32	0.06	0.02	0.29	0.06	0.01
	0.67	0.13	0.03	0.62	0.12	0.03

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
 Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
 Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

PM = Particulate Matter  
 PM10 = Particulate Matter (<10 um)  
 PM2.5 = Particle Matter (<2.5 um)  
 PTE = Potential to Emit



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
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*Thomas W. Easterly*  
**Commissioner**

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

## **SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED**

**TO:** Richard Paul III  
Superior Solvent and Chemicals, Inc.  
1402 N. Capital Avenue  
Indianapolis, IN 46202

**DATE:** June 18, 2012

**FROM:** Matt Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

**SUBJECT:** Final Decision  
Federally Enforceable State Operating Permit Renewal  
039-30834-00487

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
Steven Wakefield, Responsible Official  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

IDEM Staff	PWAY 6/18/2012 Superior Solvents and Chemicals, Inc. 039-30834-00487 (final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

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2		Steven Wakefield VP of Operations Superior Solvents and Chemicals, Inc. 1402 N Capital Avenue Indianapolis IN 46202 (RO CAATS)									
3		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)									
4		Elkhart Public Library 300 S 2nd St Elkhart IN 46516-3184 (Library)									
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