NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Minor Source Operating Permit (MSOP) Renewal

for Superior Industrial Solutions, Inc.
in Marion County (Center Township)

MSOP Renewal No.: M097-43534-00756

The Indiana Department of Environmental Management (IDEM) has received an application from Superior Industrial Solutions, Inc., located at 560 Dorman Street, Indianapolis, Indiana 46202 for a renewal of its MSOP issued on April 18, 2016. If approved by IDEM’s Office of Air Quality (OAQ), this proposed renewal would allow Superior Industrial Solutions, Inc. to continue to operate its existing source.

This draft permit does not contain any new equipment that would emit air pollutants, and no conditions from previously issued permits/approvals have been changed.

A copy of the permit application and IDEM’s preliminary findings have been sent to:

Indianapolis Public Library
40 E Saint Clair Street
Indianapolis, Indiana 46204

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

A copy of the application and preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so
that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M097-43534-00756 in all correspondence.

Comments should be sent to:

Aida DeGuzman  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Aida DeGuzman or (317) 233-4972  
Or dial directly: (317) 233-4972  
Fax: (317) 232-6749 attn: Aida DeGuzman  
E-mail: adeguzma@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM’s response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM’s decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above and will also be sent to the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Aida DeGuzman of my staff at the above address.

Josiah K. Balogun, Section Chief  
Permits Branch  
Office of Air Quality
DRAFT

Minor Source Operating Permit (MSOP) Renewal
OFFICE OF AIR QUALITY

Superior Industrial Solutions, Inc.
560 Dorman Street
Indianapolis, Indiana 46202

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

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SECTION  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 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary source that formulates food grade additives for use in animal feed as well as silicone blends.

Source Address: 560 Dorman Street, Indianapolis, Indiana 46202
General Source Phone Number: 317-781-4400
SIC Code: 5169 (Chemicals and Allied Products, Not Elsewhere Classified)
County Location: Marion Center Township
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit Program
Minor Source, under PSD 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

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

(a) One (1) loading rack, identified as P001, with a maximum throughput of 3,591,000 gallons per year, constructed in 2015.

(b) Four (4) vertical fixed roof tanks, identified as T1, through T4, constructed in 2015 with a maximum capacity of 3000 gallons for T1 and T2 each, and T3 and T4 with a maximum capacity of 5,000 gallons each.

(c) One (1) chemical blending operation, identified as P003 using blending tanks, T-1 and T-2 of capacity 3.000 gallons, each. Constructed in 2015, with a maximum throughput of 14,364,000 gallons per year.

(d) One (1) container filling operation, identified as P002, with a maximum capacity of 10,773,000 gallons per year, constructed in 2015.

(e) One (1) natural gas-fired boiler, identified as B1, constructed in 2105 with a maximum heat input rating of 0.55 million British thermal units per hour (MMBtu/hr).

(f) One (1) loading rack, identified as P004, with a maximum throughput of 422,095 gallons per year, approved in 2016 for constructed.

(g) One (1) container filling operation, identified as P005, with a maximum capacity of 514,750 gallons per year, approved in 2016 for constructed.

(h) One (1) chemical blending operation, identified as P006, constructed in 2016, with a maximum capacity of 514,750 gallons per year, using no control, and exhausting indoors.
SECTION B  GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, M097-43534-00756, 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]

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

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

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

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

B.7 Duty to Provide Information

(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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 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

(c) The notification 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.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, 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 Permittee shall implement the PMPs.

(b) 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.

(c) 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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M097 43534 00756 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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 one hundred twenty (120) days prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

(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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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 one hundred twenty (120) days 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 2-6.1 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
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

The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

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 permitted 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.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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
The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.:

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.
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 Permit Revocation [326 IAC 2-1.1-9]  
Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]  
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]  
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]
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]
(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(c).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

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.

(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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements  [326 IAC 2-6.1-5(a)(2)]

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

(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]

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 2-6.1-5(a)(2)]

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

(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. The analog instrument shall be capable of measuring values outside of the normal range.
(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

C.12 Response to Excursions or Exceedances

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.13 Actions Related to Noncompliance Demonstrated by a Stack Test

(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.
Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the 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 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of 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
(b) 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.

(c) 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.
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

**Emission Unit Description:**

(e) One (1) natural gas-fired boiler, identified as B1, constructed in 2105 with a maximum heat input rating of 0.55 million British thermal units per hour (MMBtu/hr).

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

<table>
<thead>
<tr>
<th>Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>D.1.1 Particulate Emissions Limitation [326 IAC 6-2-4]</strong></td>
</tr>
<tr>
<td>Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitation for Sources of Indirect Heating), the particulate emissions from the boiler shall not exceed 0.6 pounds per MMBtu heat input.</td>
</tr>
<tr>
<td><strong>D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]</strong></td>
</tr>
<tr>
<td>A Preventive Maintenance Plan is required for the boiler. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.</td>
</tr>
</tbody>
</table>
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  

MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>Superior Industrial Solutions, Inc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
<td>560 Dorman Street</td>
</tr>
<tr>
<td>City:</td>
<td>Indianapolis, Indiana 46202</td>
</tr>
<tr>
<td>Phone #:</td>
<td>317 781 4400</td>
</tr>
<tr>
<td>MSOP #:</td>
<td>097-43534-00756</td>
</tr>
</tbody>
</table>

I hereby certify that Superior Industrial Solutions, Inc. is:  
☐ still in operation.  
☐ no longer in operation.

I hereby certify that Superior Industrial Solutions, Inc. is:  
☐ in compliance with the requirements of MSOP 097-43534-00756.  
☐ not in compliance with the requirements of MSOP 097-43534-00756.

Authorized Individual (typed):

Title:

Signature:

Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<table>
<thead>
<tr>
<th>Noncompliance:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.


THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _______ OR, PERMIT CONDITION # _______ AND/OR PERMIT LIMIT OF _______________

THIS INCIDENT MEETS THE DEFINITION OF “MALFUNCTION” AS LISTED ON REVERSE SIDE? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT? Y N

COMPANY: __________________________________________ PHONE NO. (_____)___________________
LOCATION: (CITY AND COUNTY) ________________________________________________________________
PERMIT NO. __________________ AFS PLANT ID: ________________ AFS POINT ID: ________________ INSP: __________
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: __________________________________________
DATE/TIME MALFUNCTION STARTED: ______/_____/20____ _______ AM / PM
ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _______________________________

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ______/_____/20____ _______ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: __________________________________
ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: ___________________________

MEASURES TAKEN TO MINIMIZE EMISSIONS: _________________________________________________________

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:
CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: ________________________________
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: ________________________________
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: ____________________
INTERIM CONTROL MEASURES: (IF APPLICABLE) _______________________________________________________

MALFUNCTION REPORTED BY: _______________________________ TITLE: __________________________
(SIGNATURE IF FAXED)
MALFUNCTION RECORDED BY: ___________________ DATE: __________________ TIME: _______________

*SEE PAGE 2
Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 “Malfunction” definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

*Essential services* are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

________________________________________________________________________
________________________________________________________________________
Source Description and Location

Source Name: Superior Industrial Solutions, Inc.
Source Location: 560 Dorman Street, Indianapolis, Indiana 46202
County: Marion (Center Township)
SIC Code: 5169 (Chemicals and Allied Products, Not Elsewhere Classified)
Permit Renewal No.: 097-43534-00756
Permit Reviewer: Aida DeGuzman

On December 7, 2020, Superior Oil Company, Inc., submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit and change its name to Superior Industrial Solutions, Inc. OAQ has reviewed the operating permit renewal application from Superior Oil Company, Inc. relating to the operation of a stationary source that formulates food grade additives for use in animal feed as well as silicone blends. The source was issued its initial MSOP (M097-36777-00756) on April 18, 2016.

Existing Approvals

The source was issued its initial MSOP No. M097-36777-00756 on April 18, 2016. The source has since received the following approval:

Administrative Amendment No. 097 37295 00756 on June 21, 2016.

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.

Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) One (1) loading rack, identified as P001, with a maximum throughput of 3,591,000 gallons per year, constructed in 2015.

(b) Four (4) vertical fixed roof tanks, identified as T1, through T4, constructed in 2015 with a maximum capacity of 3,000 gallons for T1 and T2 each, and T3 and T4 with a maximum capacity of 5,000 gallons each.

(c) One (1) chemical blending operation, identified as P003 using blending tanks, T-1 and T-2 of capacity 3,000 gallons, each. Constructed in 2015, with a maximum throughput of 14,364,000 gallons per year.

(d) One (1) container filling operation, identified as P002, with a maximum capacity of 10,773,000 gallons per year, constructed in 2015.

(e) One (1) natural gas-fired boiler, identified as B1, constructed in 2015 with a maximum heat input rating of 0.55 million British thermal units per hour (MMBtu/hr).

(f) One (1) loading rack, identified as P004, with a maximum throughput of 422,095 gallons per year, approved in 2016 for constructed.
(g) One (1) container filling operation, identified as P005, with a maximum capacity of 514,750 gallons per year, approved in 2016 for constructed.

(h) One (1) chemical blending operation, identified as P006, constructed in 2016, with a maximum capacity of 514,750 gallons per year, using no control, and exhausting indoors.

**Enforcement Issue**

There are no enforcement actions pending.

**Emission Calculations**

See Appendix A of this Technical Support Document for detailed emission calculations.

**County Attainment Status**

The source is located in Marion County (Center Township).

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Attainment effective May 21, 2020, for the 2010 SO₂ standard for Center, Perry, and Wayne townships. Better than national standards for the remainder of the county.</td>
</tr>
<tr>
<td>CO</td>
<td>Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

(a) **Ozone Standards**
Volatiloe organic compounds (VOC) and Nitrogen Oxides (NOₓ) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) **PM₂.₅**
Marion County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) **SO₂**
U.S. EPA, in the Federal Register Notice 85 FR 30844 dated May 21, 2020, designated Marion County Center Township as attainment for SO₂ effective May 21, 2020. On November 5, 2020, the Environmental Rules Board issued an emergency rule adopting the U.S. EPA’s designation. Therefore, SO₂ emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
(d) Other Criteria Pollutants
Marion County has been classified as attainment or unclassifiable in Indiana for all the other
criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for
Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

---

**Fugitive Emissions**

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC
2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source
Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on
August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset,
and Part 70 Permit applicability.

The fugitive emissions of regulated air pollutants and hazardous air pollutants (HAP) are counted toward
the determination of MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the
Clean Air Act (CAA).

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**Greenhouse Gas (GHG) Emissions**

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at
http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled
that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for
the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014,
the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting
decisions in light of the Supreme Court's decision. U.S. EPA’s guidance states that U.S. EPA will no
longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on
greenhouse gas emissions.”

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC
2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted
under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is
invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG
emissions to determine operating permit applicability or PSD applicability to a source or modification.

---

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

<table>
<thead>
<tr>
<th>Unrestricted Potential Emissions (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM&lt;sup&gt;1&lt;/sup&gt;</td>
</tr>
<tr>
<td>-----------------------------------------</td>
</tr>
<tr>
<td>Total PTE of Entire Source Including Fugitive Emissions*</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
<tr>
<td>MSOP Thresholds</td>
</tr>
</tbody>
</table>

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

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all regulated air pollutants is less than
100 tons per year. However, VOC is equal to or greater than twenty-five (25) tons per year. The
source is not subject to the provisions of 326 IAC 2-7. The source will be issued an MSOP
Renewal.
(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7. The source will be issued an MSOP Renewal.

### Potential to Emit After Issuance

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) (Uncontrolled/Unlimited)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PM</strong>&lt;sup&gt;1&lt;/sup&gt;</td>
</tr>
<tr>
<td>Loading Rack (P001, P004)</td>
</tr>
<tr>
<td>Blending (P003, P006)</td>
</tr>
<tr>
<td>Container Filling (P002, P005)</td>
</tr>
<tr>
<td>Storage Tanks, T1, T2, T3, T4</td>
</tr>
<tr>
<td>Natural Gas Boiler, B1</td>
</tr>
<tr>
<td>Fugitives (Paved Roads)</td>
</tr>
<tr>
<td><strong>Total PTE of Entire Source Including Fugitives</strong></td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
<tr>
<td>MSOP Thresholds</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
</tr>
</tbody>
</table>

Fugitive emissions of regulated air pollutants and hazardous air pollutants (HAP) are counted toward the determination of MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

Appendix A of this TSD reflects the detailed unlimited/uncontrolled emissions of the source.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
Federal Rule Applicability

Federal rule applicability for this source has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for Boiler B1, because this boiler has a heat input of 0.55 MMBtu/hour, which is less than the minimum heat input applicability rate of 10 MMBtu/hour.

(b) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels), 40 CFR 60, Subpart Kb and 326 IAC 12, are not included in the permit for the four (4) vertical fixed roof tanks, identified as T1, through T4, because each tank has a capacity less than 75 cubic meters (19,812.9 gallons). T1 and T2 have a capacity of 3,000 gallons, each; and T3 and T4 have a capacity of 5,000 gallons, each.

(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 and 326 IAC 12, are not included in the permit for the source, since this source is not a chemical plant that produces any chemicals through chemical synthesis.

A chemical plant manufactures chemicals using air oxidation reactors and their associated product separators and recovery devices; reactors and their associated product separators and recovery devices; distillation units and their associated distillate receivers and recovery devices; associated unit operations; associated recovery devices; and any feed, intermediate and product storage vessels, product transfer racks, and connected ducts and piping. A chemical manufacturing process unit includes pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, instrumentation systems, and control devices or systems.

(d) The requirements of the New Source Performance Standard for Volatile Organic Compound (VOC) Emissions From The Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations, 40 CFR 60, Subpart NNN and 326 IAC 12, are not included in the permit for the source, since this source is not a chemical plant that produces any chemicals through chemical synthesis.

(e) The requirements of the New Source Performance Standard for Volatile Organic Compound (VOC) Emissions From The Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes, 40 CFR 60, Subpart RRR and 326 IAC 12, are not included in the permit for the source, since this source is not a chemical plant that produces any chemicals through chemical synthesis.

(f) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater, 40 CFR 63, Subpart G, are not included in the permit for source, since the source is not a chemical plant that produces any chemicals through chemical synthesis. Further, it is not a major source of HAPs emissions.
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Organic Chemical Manufacturing, 40 CFR 63, Subpart FFFF, are not included in the permit for the source, since the source is not a miscellaneous organic chemical manufacturing plant that produces any chemicals through the process that includes any, all or a combination of reaction, recovery, separation, purification, or other activity, operation, manufacture, or treatment which are used to produce a product. The source does not employ any of these processes utilized at a miscellaneous organic chemical manufacturing plant. Further, the source is not a major source of HAPs emissions.

The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included in the permit for Boiler B1, since this boiler is a gas-fired boiler. 40 CFR 63.11195(e) specifically exclude gas-fired boiler from being subject to this NESHAP, 40 CFR 63, Subpart JJJJJJ.

The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Chemical Manufacturing Area Sources, 40 CFR 63.11494, Subpart VVVVVV, are not included in this permit, because the source does not manufacture any of the HAPs listed in Table 1 of Subpart VVVVVV, as specified in 40 CFR 63.11494(a)(2) of this subpart.

There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

Compliance Assurance Monitoring (CAM):

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

State rule applicability for this source has been reviewed as follows:

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Potential to Emit After Issuance section of this document.

326 IAC 2-2 (PSD)
The source, a stationary source that formulates food grade additives for use in animal feed as well as silicone blends was originally constructed in 2015. The source was initially issued Registration No. 097-36137-00756 on August 25, 2015 and transitioned into a MSOP source and was issued MSOP No. 097-36777-00756 on April 18, 2016. The source is an existing minor PSD source, under 326 IAC 2-2 because no regulated pollutant is emitted at major source threshold and the source is not one of the 28 listed source categories.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The provisions 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, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

The operation of this stationary source that formulates food grade additives for use in animal feed as well as silicone blends will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.
326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, Clark, or Floyd County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2).

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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

State Rule Applicability – Individual Facilities

State rule applicability has been reviewed as follows:

326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1(d), Particulate emissions from the combustion of fuel for indirect heating from all facilities receiving permits to construct on or after September 21, 1983, shall be limited by 326 IAC 6-2-4. Since boiler, identified as B1 was constructed in 2015, its particulate matter (PM) emissions shall be limited by the following equation in 326 IAC 6-2-4:

\[
Pt = \frac{1.09}{Q^{0.26}}
\]

Where:

\(Pt\) = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).

\(Q\) = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility’s permit application, except when some lower capacity is contained in the facility’s operation permit; in which case, the capacity specified in the operation.

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu. Therefore, PM emissions from Boiler, identified as B1 shall not exceed 0.6 lb/MMBtu

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
Boiler, identified as B1 is not subject to 326 IAC 326 IAC 7-1.1 because it has a potential to emit (or limited potential to emit) sulfur dioxide (SO2) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-4 (Petroleum Sources)
The storage tanks in this source are not subject to 326 IAC 8-4 rules, because this rule is specific to handling and storing of petroleum products. The storage vessels at this source are used to store volatile organic liquid (VOL), excluding petroleum products.

326 IAC 8 (VOC Rules)
There are no provisions in 326 IAC 8 that applies to this source that handles and blends volatile organic liquid materials in formulating food grade additives for use in animal feed as well as silicone blends.
326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Container Filling (P002, P005), Chemical Blending Units (P003, P006), Loading Rack (P001, P004), and Vertical Fixed Roof Tanks (T-1, T-2, T-3, T-4)

Each of these emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)
The requirements of 326 IAC 10-3 do not apply to Boiler, identified as B1, since this unit is not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Compliance Determination and Monitoring Requirements

There are no compliance 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. An application for the purposes of this review was received on December 7, 2020.

The operation of this stationary source that formulates food grade additives for use in animal feed as well as silicone blends, shall be subject to the conditions of the attached proposed MSOP Renewal No. M097-43534-00756.

The staff recommends to the Commissioner that the MSOP Renewal be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Aida DeGuzman, 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) 233-4972 or (800) 451-6027, and ask for Aida DeGuzman or (317) 233-4972.

(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 Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
## Emission Calculations

**Company Name:** Superior Industrial Solutions, Inc.  
**Plant Location:** 560 Dorman Street, Indianapolis, Indiana 46202  
**MSOP Renewal No.:** 097-43534-00756  
**Permit Reviewer:** Aida DeGuzman

### PM PM10 PM2.5 SO2 NOx CO Total HAPs

<table>
<thead>
<tr>
<th>Facility/Process</th>
<th>VOC</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Loading Rack (P001, P004)</td>
<td>3.03</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.33</td>
</tr>
<tr>
<td>Blending (P003, P006)</td>
<td>18.88</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>6.67</td>
</tr>
<tr>
<td>Container Filling (P002, P005)</td>
<td>7.31</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>1.93</td>
</tr>
<tr>
<td>Storage Tanks, T1, T2, T3, T4</td>
<td>3.56</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Natural Gas Boiler, B1</td>
<td>0.01</td>
<td>0.004</td>
<td>0.018</td>
<td>0.018</td>
<td>0.001</td>
<td>0.236</td>
<td>0.198</td>
<td>9.930</td>
</tr>
<tr>
<td><strong>TOTAL PTE</strong></td>
<td>29.81</td>
<td>0.004</td>
<td>0.018</td>
<td>0.018</td>
<td>0.001</td>
<td>0.236</td>
<td>0.198</td>
<td>4.25E-03</td>
</tr>
</tbody>
</table>

**Note:** The source does not employ a control device for each of the emission units.
Company Name: Superior Industrial Solutions, Inc.  
Plant Location: 560 Dorman Street, Indianapolis, Indiana 46202  
MSOP Renewal No.: 097-43534-00756  
Permit Reviewer: Aida DeGuzman

### Storage Tanks Emissions Summary

<table>
<thead>
<tr>
<th>Tanks ID</th>
<th>Capacity (gallons)</th>
<th>Throughput (gal/year)</th>
<th>Working Losses (lbs/year)</th>
<th>Breathing Losses (lbs/year)</th>
<th>Total VOC Emissions (lbs/year)</th>
<th>Total VOC Emissions (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vertical Fixed Roof Tank -T1</td>
<td>3,000</td>
<td>7,182,000</td>
<td>261.37</td>
<td>0.18</td>
<td>261.55</td>
<td>0.13</td>
</tr>
<tr>
<td>Vertical Fixed Roof Tank -T2</td>
<td>3,000</td>
<td>7,182,000</td>
<td>261.37</td>
<td>0.18</td>
<td>261.55</td>
<td>0.13</td>
</tr>
<tr>
<td>Vertical Fixed Roof Tank -T3</td>
<td>5,000</td>
<td>6,104,700</td>
<td>310.76</td>
<td>5.34</td>
<td>316.1</td>
<td>0.16</td>
</tr>
<tr>
<td>Vertical Fixed Roof Tank -T4</td>
<td>5000</td>
<td>6104700</td>
<td>310.76</td>
<td>5.34</td>
<td>316.1</td>
<td>0.16</td>
</tr>
</tbody>
</table>

**TOTAL PTE from Tanks** 0.58
### Loading Rack Emissions

<table>
<thead>
<tr>
<th>Unit</th>
<th>Truck Loading Rack</th>
<th>Emission Factor (lbs/1000 gal)*</th>
<th>VOC PTE (tons/year)</th>
<th>HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>P001</td>
<td>3,591,000</td>
<td>0.9458</td>
<td>1.70</td>
<td>0.00</td>
</tr>
<tr>
<td>P004</td>
<td>422,095</td>
<td>6.2926</td>
<td>1.33</td>
<td>1.33</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>3.03</td>
<td>1.33</td>
<td></td>
</tr>
</tbody>
</table>

Note: Assuming HAP equals 100% VOC for P004

*Emissions Factor was determined using AP-42 EF for loading losses, Chapter 5.2 - Transportation and Marketing of Petroleum Liquids*

\[
E = \frac{12.46 \times S \times P \times M}{T}
\]

- \(E\): Emission Factor in pounds of emissions per 1000 gallons loaded
- \(T\): Temp (Rankine)
- \(M\): Mol. Wt (lb/lb-mole)
- \(P\): Vapor pressure (psia)
- \(S\): Saturation factor (1.45 for splash loading)

Note: The parameters needed in the equation to calculate the emission factor are not shown for claimed of confidentiality.
### Chemical Additive Blending Operations (P003) - Using 3000 gallon Blend Tanks T-1, T-2 and T-5

<table>
<thead>
<tr>
<th>Product</th>
<th>Quantity (gallons)</th>
<th>Blending Emissions (lb/yr)</th>
<th>Total Emissions (lb/yr)</th>
<th>Total Emissions (ton/yr)</th>
<th>HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Food Additive (P003)</td>
<td>14,364,000</td>
<td>16,855</td>
<td>24,433</td>
<td>12.22</td>
<td>0</td>
</tr>
<tr>
<td>P006</td>
<td>514750</td>
<td>9,473</td>
<td>13,334</td>
<td>6.67</td>
<td>6.67</td>
</tr>
<tr>
<td>Total Emissions (ton/yr)</td>
<td></td>
<td></td>
<td></td>
<td>18.88</td>
<td></td>
</tr>
</tbody>
</table>

Note: Assuming HAP equals 100% VOC for T5

Emissions using AP-42 EF for loading losses (Chapter 5.2)

\[ E = 12.46 \times S \times P \times M / T \]

- \( E \) = pounds of emissions per 1000 gallons loaded
- \( T \) = Temp (Rankine) = 530
- \( M \) = Mol. Wt (lb/lb-mole)
- \( P \) = Vapor pressure (psia)
- \( S \) = Saturation factor (1.45 for splash loading)

Mixing emissions (EIIP Volume 2, Chapter 8)

\[ E = M \times K_x \times A \times P \times 3600 \times H / (R \times T) \]

- \( E \) = emission in pounds
- \( T \) = Temp. (Rankine)
- \( M \) = Mol. Wt (lb/lb-mole)
- \( P \) = Vapor pressure (psia)
- \( A \) = Area of tank
- \( H \) = batch time (hrs)
- \( K_x \) = gas phase mass transfer coeff.

\[ K_x = 0.00438 \times U^{0.78} \times (18/M)^{1/3} \]

- \( U \) = wind speed = 0.1 mph
- \( R \) = Universal gas constant = 10.73
## Container Filling Operations

<table>
<thead>
<tr>
<th>Unit</th>
<th>Truck Loading Rack</th>
<th>Emission Factor (lbs/1000 gal)*</th>
<th>VOC PTE (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>P002</td>
<td>10,773,000</td>
<td>0.9988</td>
<td>5.38</td>
</tr>
<tr>
<td>P005</td>
<td>514,750</td>
<td>7.5009</td>
<td>1.93</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>7.31</td>
<td>1.93</td>
</tr>
</tbody>
</table>

Note: Assuming HAP equals 100% VOC for P005

E = 12.46 *S*P*M/T

*Emissions Factor was determined using AP-42 EF for loading losses, Chapter 5.2 - Transportation and Marketing of Petroleum Liquids

Note: The parameters needed in the equation to calculate the emission factor are not shown for claimed of confidentiality.
Appendix A: Emission Calculations

Company Name: Superior Industrial Solutions, Inc.
Plant Location: 560 Dorman Street, Indianapolis, Indiana 46202
MSOP Renewal No.: 097-43534-00756
Permit Reviewer: Aida DeGuzman

### Heat Input Capacity

<table>
<thead>
<tr>
<th></th>
<th>mmBtu/hr</th>
<th>mmscf/hr</th>
<th>MMCF/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Boiler</td>
<td>0.55</td>
<td>1020</td>
<td>4.7</td>
</tr>
</tbody>
</table>

### Potential Throughput

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>0.004</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.018</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>0.018</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.001</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>0.24</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.01</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>0.20</td>
</tr>
</tbody>
</table>

**see below

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 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.

**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 (MBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

### Hazardous Air Pollutants (HAPs)

#### HAPs - Organics

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMCF</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in MBtu</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td>4.444E-03</td>
</tr>
</tbody>
</table>

#### HAPs - Metals

<table>
<thead>
<tr>
<th>Emission Factor in MBtu</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential Emission in tons/yr</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.7E-03</td>
<td>1.294E-05</td>
</tr>
</tbody>
</table>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.
January 13, 2021

Richard Paul
Superior Industrial Solutions, Inc.
1402 N Capitol Ave, Ste 100
Indianapolis, IN 46202

Re: Public Notice
Superior Industrial Solutions, Inc.
Permit Level: MSOP Renewal
Permit Number: 097-43534-00756

Dear Mr. Paul:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

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. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, are available electronically at:

IDEM’s online searchable database: [http://www.in.gov/apps/idem/caats/](http://www.in.gov/apps/idem/caats/) Choose Search Option by Permit Number, then enter permit 43534

and

IDEM’s Virtual File Cabinet (VFC): [http://www.IN.gov/idem](http://www.IN.gov/idem). Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: [https://www.in.gov/idem/5474.htm](https://www.in.gov/idem/5474.htm)

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Indianapolis Public Library – Central Library, 40 East Saint Clair Street in Indianapolis, IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.
Please review the draft permit documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Aida DeGuzman, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-4972 or dial (317) 233-4972.

Sincerely,

Theresa Weaver

Theresa Weaver
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020
January 13, 2021

To: Indianapolis Public Library – Central Library

From: Jenny Acker, Branch Chief
       Permits Branch
       Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

Applicant Name: Superior Industrial Solutions, Inc.
Permit Number: 097-43534-00756

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019
Notice of Public Comment

January 13, 2021
Superior Industrial Solutions, Inc.
097-43534-00756

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana’s Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.

Enclosure
PN AAA Cover Letter 2/28/2020
# Mail Code 61-53

**Name and address of Sender**

<table>
<thead>
<tr>
<th>Line</th>
<th>Article Number</th>
<th>Name, Address, Street and Post Office Address</th>
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<th>Handing Charges</th>
<th>Act. Value (If Registered)</th>
<th>Insured Value</th>
<th>Due Send if COD</th>
<th>R.R. Fee</th>
<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
<th>Remarks</th>
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<td>1</td>
<td>1</td>
<td>Richard Paul Superior Industrial Solutions, Inc. 1402 N Capitol Ave Ste 100 Indianapolis IN 46202 (Source CAATS)</td>
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<td>2</td>
<td>Jay Baker Superior Oil Company Incorporated 1402 N Capitol Ave Ste 100 Indianapolis IN 46202 (RO CAATS)</td>
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<td>Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)</td>
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<td>Indianapolis Public Library - Central Library 40 E Saint Clair St Indianapolis IN 46204 (Library)</td>
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<td>5</td>
<td>5</td>
<td>Indianapolis City Council and Mayors office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)</td>
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<td>Carmel City Council and Mayors Office 1 Civic Square Carmel IN 46032 (Local Official)</td>
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<td>Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)</td>
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<td>Matt Mosier Office of Sustainability City-County Bldg/200 E Washington St. Rm# 2460 Indianapolis IN 46204 (Local Official)</td>
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<td>Planning Div., Dept. of Metropolitan Development 1735 S. West St. Indianapolis IN 46225 (Local Official)</td>
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<td>City of Indianapolis, Attn: General Council 200 East Washington Street, Rm E Indianapolis IN 46204 (Affected Party)</td>
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<td>Sebastian Valverde 4235 Springwood Trail Indianapolis IN 46228 (Affected Party)</td>
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<td>Marion County Health Department 3338 North Rural Street Indianapolis IN 46205 (Local Official)</td>
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**Total number of pieces Listed by Sender**: 15

**Total number of Pieces Received at Post Office**: 15

**Postmaster, Per (Name of Receiving employee)**

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See *Domestic Mail Manual* R900, S913, and S921 for limitations of coverage on insured and COD mail. See *International Mail Manual* for limitations on coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.