

July 28, 2001

Mr. Norman E. Smiley
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Re: 097-14227-00259
First Administrative Amendment to
FESOP 097-5617-00259

Dear Mr. Smiley:

Dow AgroSciences LLC was issued a FESOP on August 18, 1997 for a research and development facility. A letter requesting changes to this permit was received on March 29, 2001. The addition of the research and development facility consisting of mills, a batch mixer, a tray dryer, and a fluid bed dryer is deemed to be an insignificant activity pursuant to 326 IAC 2-7-1(21)(8) and therefore qualifies as an administrative amendment under 326 IAC 2-8-10. The permit is hereby administratively amended as follows:

The permit amendment pertains to the addition of a twelfth insignificant activity. The following changes are reflected below in bold face.

1. Equipment Descriptions in Section A.3 Insignificant Activities have been amended to include the following:
 - (12) **Research and development of formulations for plant and animal herbicide and pesticide products identified as emission unit ID 301-DC. This emission unit includes a batch mixer, tray dryer, fluid bed dryer, and mills. Particulate Matter is controlled by a baghouse identified as control equipment ID 301-DC.**
2. The additional insignificant activity has been added to the Emission Unit Description box in Section D.3 Facility Operation Conditions as follows:

(11) Emissions Unit ID 310-1	One CBT Wearparts Soil Pulverizer (Emission ID# 310-1), with a maximum operating capacity of 40 ton/hr
(12) Emissions Unit ID 301-DC	Research and development of formulations for plant and animal herbicide and pesticide products identified as emission unit ID 301-DC. This emission unit includes a batch mixer, tray dryer, fluid bed dryer, and mills. The maximum capacity for these units total 700 pounds per hour. Particulate Matter is controlled by a baghouse identified as control equipment ID 301-DC.

3. The Emissions Limitations rule under Section D.3 is also now amended to include the additional insignificant activity as follows:

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

D.3.1 Particulate Matter (PM)

- (a) The 90 HP distillate fuel No.2 diesel fired engine is subject to 326 IAC 6-3 (Process

Operations: Particulate Emissions Limitations). Pursuant to 326 IAC 6-3-2, the allowable particulate matter (PM10) emissions shall be based on the Process Weight Rate to 42.5 lb per hour.

- (b) Pursuant to 326 IAC 6-3-2, the PM emission rate from Emissions Unit ID 301-DC shall not exceed the 2.02 pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.3.2 Opacity Limitations [326 IAC 5-1-2

Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

- (a) visible emissions shall not exceed an average of 30% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

If the IDEM, OAQ, or ERMD makes a request for records to the Permittee, the Permittee shall furnish the records to the IDEM, OAQ, or ERMD within a reasonable time.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott L. Dombrowski, at (317) 327-2176.

Sincerely,

Vaneeta Kumar, Administrator
Indianapolis, ERMD

SLD

Attachments-amended FESOP permit page

cc: file (2 copies)
Mindy Hahn, IDEM OAQ

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY
and
ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION**

**Dow AgroSciences
9330 Zionsville Road
Indianapolis, Indiana 46268-1054**

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

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 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-5617-00259	
Issued by: Robert F. Holm, Ph.D., Administrator ERMD	Issuance Date: 08/18/97
First Minor Modification: MMF 097-10523-00259 Affected Pages: 3, 25, 26, 27, 30, and 31	
Issued by: Robert F. Holm, Ph.D., Administrator ERMD	Issuance Date: 01/15/99
First Administrative Amendment: AAF 097-14227-00259 Affected Pages: 5, 27	
Issued by: Vaneeta Kumar Administrator ERMD	Issuance Date:

- (8) **Emissions Unit ID 5309-08; Stack/Vent ID No. 308-1.** One (1) natural gas-fired Bryan Steam Corporation Boiler. Maximum rated heat input capacity was 10.5 MMBtu/hr. Installation date was December 1993.
- (9) **Emissions Unit ID 5309-09; Stack/Vent ID No. 306-2.** One (1) diesel fuel fired 1000 kW/hr electrical backup generator. Maximum rated heat input capacity was 9.38 MMBtu/hr. Installation date was December 1993.
- (10) **Emissions Unit ID 5309-10; Stack/Vent ID No. 308-2.** One (1) diesel fuel fired 1000 kW/hr electrical backup generator. Maximum rated heat input capacity was 9.38 MMBtu/hr and 3,686 HP/hr. Installation date was December 1993.

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

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) natural gas-fired combustion sources with heat input equal to, or less than, 10 MMBTU per hour.
- (2) storage tanks with capacities less than, or equal to, 1,000 gallons and annual throughputs less than 12,000 gallons.
- (3) closed loop heating and cooling systems.
- (4) noncontact cooling tower systems with forced and induced draft not regulated under a NESHAP.
- (5) replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.
- (6) blowdown for any of the following: sight glass; boiler; compressor; pump; and cooling tower.
- (7) on-site fire and emergency response training approved by the department.
- (8) filter or coalescer media change out.
- (9) a laboratory as defined in 326 IAC 2-7-1(20)(C).
- (10) soil handling associated with greenhouse research and development.
- (11) One CBT Wearparts Soil Pulverizer (Emission ID# 310-1), with a maximum operating capacity of 40 ton/hr.
- (12) Research and development of formulations for plant and animal herbicide and pesticide products identified as emission unit ID 301-DC. This emission unit includes a batch mixer, tray dryer, fluid bed dryer, and mills. Particulate Matter is controlled by a baghouse identified as control equipment ID 301-DC.

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 Environmental Resources Management Division, and the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

This permit supersedes the operating conditions of all construction and operating permits issued to this stationary source under 326 IAC 2 prior to the effective date of this FESOP.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

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