

December 17, 2002

Re: A.E. Staley 157-14974-00003

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
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, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen 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 consideration 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.

Enclosure

FNPER.wpd 8/21/02

PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR QUALITY

**A. E. Staley Manufacturing Company
2245 N Sagamore Parkway
Lafayette, Indiana 47904-1620**

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

This approval 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 2-7 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.

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| Source Modification No.: 157-14974-00003 | |
| Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Management | Issuance Date: December 17, 2002 |

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SECTION A

SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1 through 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 approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a grain processing plant.

Responsible Official: Kevin J. Niebrugge
Source Address: 2245 N Sagamore Parkway, Lafayette, IN 47904-1620
Mailing Address: 2200 E Eldorado St., Decatur, IL 62525
Phone Number: (765) 448-7123
SIC Code: 2046
County Location: Tippecanoe
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD or Emission Offset Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This source modification involves the following emission units and pollution control devices:

- (a) The #2 Flash Dryer System, consisting of:
- (1) One (1) starch flash dryer identified as Starch Flash Dryer #2, rated at 40 million Btu per hour, with airflow of 110,000 acfm. Dried starch is collected by six cyclones in parallel. Particulate emissions are controlled by a wet scrubber, then exhaust to stack S/V #73.
 - (2) One (1) grinding mill identified as Grinder Mill #1, with airflow of 3600 acfm. Particulate emissions are controlled by a baghouse, then exhaust to stack S/V #286.
 - (3) One (1) grinding mill identified as Grinder Mill #2, with airflow of 3600 acfm. Particulate emissions are controlled by a baghouse, then exhaust to stack S/V #287.
 - (4) One (1) Grinder Feed Collector. Particulate emissions are vented to the intake of the Starch Storage and Transfer Bin System.
 - (5) Starch Slurry Tanks, which exhaust to S/V #80.
 - (6) Four (4) dewatering presses and associated equipment, which exhaust to stack S/V #249 and S/V #250.
- (b) The Starch Storage and Transfer Bin System, consisting of:
- (1) Starch Storage Bin #20, with airflow of 2100 acfm. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #76.

- (2) Starch Storage Bin #21, with airflow of 2100 acfm. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #77.
 - (3) Starch Storage Bin #22, with airflow of 2100 acfm. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #78.
 - (4) Starch Storage Bin #23, with airflow of 2100 acfm . Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #267.
 - (5) Starch Storage Bin #34, with airflow of 2900 acfm. Particulate emissions are controlled by a bin vent filter , then exhaust to stack S/V #268.
 - (6) Starch Storage Bin #35, with airflow of 2900 acfm. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #269.
 - (7) Starch Transfer Bin #90, with airflow of 2900 acfm. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #345.
 - (8) Starch Transfer Bin #91, with airflow of 2900 acfm. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #346.
- (c) The Bulk Railcar Loadout facility, with airflow of 2200 acfm. Particulate emissions are controlled by a baghouse, then exhaust to stack S/V #79.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This source modification does not involve any insignificant activities, as defined in 326 IAC 2-7-1(21).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because it is a major source, as defined in 326 IAC 2-7-1(22).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

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

B.3 Enforceability [326 IAC 2-7-7(a)]

Unless otherwise stated, 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 citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

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 2-7-5(6)(D)]

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

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) 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. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Upon request, and within a reasonable time thereafter, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAQ or the U.S. EPA to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish such confidential records directly to the U.S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) 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.
- (d) 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.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall submit annually a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (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 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 compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3).
 - (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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[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 (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (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 PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension request does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (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. The PMPs

do require certification by the "responsible official" as defined in 326 IAC 2-7-1(34).

B.12 Emergency Provisions [326 IAC 2-7-16]

- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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 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 Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

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

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 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) 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 compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 20(b)(2)] [326 IAC 20(c)(2)]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield.
- (b) The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) The permit shield is not applicable to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) The permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) The permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) The permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)]
- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

- (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 2-7-4. 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).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
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 2-7 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 in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), 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) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (3) The Permittee notifies the:

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

and

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

- (4) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes 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 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraints of 326 IAC 2-7-20(a). The required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the applicable provisions of 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6(2)]

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 Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.
[326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

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

- (b) Except as provided in 326 IAC 2-7-19(e), 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 317-233-0425 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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.2 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.3 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.4 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, any air pollution control equipment required under Section D of this permit and used to comply with an applicable requirement shall be operated at all times that an emission unit vented to it is in operation.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

All demolition projects require notification whether or not asbestos is present.

- (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.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 14-10-4, 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) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

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

-
- (a) All required testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40

CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined in 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined in 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

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.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within one hundred eighty (180) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented until such time as the monitoring equipment is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt response steps shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

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

C.13 Pressure Gauge Specifications

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

The Permittee may request that IDEM, OAQ approve use of a pressure gauge that does not meet the above specifications, provided the Permittee can demonstrate that the alternative specification will ensure compliance with permit conditions requiring the measurement of pressure drop.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

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

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance subject to 40 CFR 68 is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit to IDEM, OAQ:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

C.16 Compliance Response Plan - Preparation, Implementation, Records and Reports [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, then IDEM, OAQ shall be promptly notified of the expected date of the shutdown, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of this permit, except as provided in part (c) below.
- (c) The Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to a malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
 - (3) An automatic measurement was taken when the process was not operating; or

- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B - Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 **Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) If the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law to resolve noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 **Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement 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.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information 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 kept 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 within a reasonable time 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, all record keeping requirements not already legally required shall be implemented within one hundred eighty (180) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (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) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

The #2 Flash Dryer System, consisting of:

- (a) One (1) starch flash dryer identified as Starch Flash Dryer #2, rated at 40 million Btu per hour, with airflow of 110,000 acfm. Dried starch is collected by six cyclones in parallel. Particulate emissions are controlled by a wet scrubber, then exhaust to stack S/V #73.
- (b) One (1) grinding mill identified as Grinder Mill #1, with airflow of 3600 acfm. Particulate emissions are controlled by a baghouse, then exhaust to stack S/V #286.
- (c) One (1) grinding mill identified as Grinder Mill #2, with airflow of 3600 acfm. Particulate emissions are controlled by a baghouse, then exhaust to stack S/V #287.
- (d) One (1) Grinder Feed Collector. Particulate emissions are vented to the intake of the Starch Storage and Transfer Bins.
- (e) Starch Slurry Tanks, which exhaust to S/V #80.
- (f) Four (4) dewatering presses and associated equipment, which exhaust to stack S/V #249 and S/V #250.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2(e), the particulate matter emissions shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

Pursuant to Construction Permit 157-1872, issued on August 10, 1990 and amended on November 1, 1991:

- (a) PM and PM-10 emissions from the Starch Flash Dryer #2 shall not exceed 3.30 pounds per hour of PM or PM-10.
- (b) PM and PM-10 emissions from Grinder Mill #1 shall not exceed 0.22 pounds per hour of PM or PM-10.
- (c) PM and PM-10 emissions from Grinder Mill #2 shall not exceed 0.22 pounds per hour of PM or PM-10.
- (d) On-stream time for the #2 Flash Dryer System shall be limited to 7534 hours of operation per 12-month period, with compliance determined for the end of each month.

For this facility, "on-stream time" is defined as the amount of time that the dryer starch feed conveyor and the Starch Flash Dryer #2 fan are both in operation.

- (e) The Grinder Feed Collector shall vent to the intake of the Starch Storage and Transfer Bin System.
- (f) Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the flow rate of the wet scrubber controlling Starch Flash Dryer #2 shall be maintained at a minimum of 300 gallons of liquid per minute.
- (g) The #2 Flash Dryer System's pneumatic product conveyor, which was replaced with a screw conveyor, shall remain inoperative unless new approval is obtained.

This condition, combined with conditions placed on the Bulk Railcar Loadout facility and Bins #20, 21 and 22, renders the requirements of PSD as not applicable for particulate matter and PM-10. Compliance with this condition will also satisfy 326 IAC 6-3-2.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control devices.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

The control devices for PM shall be in operation at all times that the equipment that it controls is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Within 60 days after achieving the maximum production rate at which this facility will be operated, but not later than 180 days after the issuance of this permit, the Permittee shall perform PM and PM-10 testing on the Starch Flash Dryer #2 and either Grinder Mill #1 or Grinder Mill #2 utilizing EPA methods approved by the Commissioner. Filterable PM-10 is assumed at 100% of filterable PM.

This test shall be repeated at intervals no longer than five (5) years from the date of the previous compliance demonstration. PM-10 includes filterable and condensible PM-10.

D.2.6 Continuous Monitoring System

- (a) A continuous monitoring system shall be installed and shall be operated at all times when Starch Flash Dryer #2 is in operation. The monitoring system shall continuously measure and record the liquid flow rate of the wet scrubber controlling Starch Flash Dryer #2.
- (b) The instruments used for the continuous monitoring system shall comply with Section C of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.
- (c) A reading that is outside of range is not a deviation from this permit provided that response actions are taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports.

D.2.7 Visible Emissions Notations

- (a) Daily visible emission notations of the exhaust of S/V #73, #286 and #287 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this facility shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.8 Control Device Inspections

- (a) An inspection shall be performed at least semi-annually of all bags controlling the grinding mills. All defective bags shall be replaced.
- (b) An inspection shall be performed at least semi-annually of the wet scrubber controlling Starch Flash Dryer #2. All defective parts shall be replaced.

D.2.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
- (b) If appropriate, an investigation regarding the cause of bag failure will be conducted and an appropriate response will be initiated within 24 hours of discovery.

Record Keeping Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2, records shall be made and kept of the scrubbing flow rates for the wet scrubber controlling Starch Flash Dryer #2. These records are necessary to render 326 IAC 2-2 and 40 CFR 52.21 as not applicable.
- (b) The maximum production capacity of the #2 Flash Dryer System, which has been claimed as confidential information, shall be kept at the emission source for the life of the facility.
- (c) All records other than maximum production capacity shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.11 Reporting Requirements

A quarterly summary of the information to document compliance shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. These quarterly reports are necessary to render 326 IAC 2-2 and 40 CFR 52.21 as not applicable.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

The Starch Storage and Transfer Bin System, consisting of:

- (a) Starch Storage Bin #20, with airflow of 2100 acfm. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #76.
- (b) Starch Storage Bin #21, with airflow of 2100 acfm. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #77.
- (c) Starch Storage Bin #22, with airflow of 2100 acfm. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #78.
- (d) Starch Storage Bin #23, with airflow of 2100 acfm. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #267.
- (e) Starch Storage Bin #34, with airflow of 2900 acfm. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #268.
- (f) Starch Storage Bin #35, with airflow of 2900 acfm. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #269.
- (g) Starch Transfer Bin #90, with airflow of 2900 acfm. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #345.
- (h) Starch Transfer Bin #91, with airflow of 2900 acfm. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #346.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2(e), the particulate matter emissions shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.3.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

- (a) Pursuant to Construction Permit 157-1872, issued on August 10, 1990 and amended on November 1, 1991, only one of Starch Storage Bins #20, #21 and #22 shall be loaded at any time.

- (b) On-stream time for Starch Storage Bins #20, #21 and #22 shall be limited to 7534 hours of operation per 12-month period, with compliance determined for the end of each month. For these bins, "on-stream time" is defined as the amount of time that the #2 Flash Dryer System's dryer starch feed conveyor and the Starch Flash Dryer #2 fan are both in operation.
- (c) Pursuant to Construction Permit 157-9182-00003, issued on April 2, 1998 and amended on October 26, 1999 and October 24, 2001:
 - (1) particulate matter emissions from Starch Storage Bin #23 (formerly known as Starch Storage Bin #33, or 7V33) shall be limited to 0.2 pounds per hour.
 - (2) particulate matter emissions from Starch Storage Bin #34 shall be limited to 0.2 pounds per hour.
 - (3) particulate matter emissions from Starch Storage Bin #35 shall be limited to 0.2 pounds per hour.
 - (4) particulate matter emissions from Starch Transfer Bin #91 shall be limited to 0.2 pounds per hour.
 - (5) particulate matter emissions from Starch Transfer Bin #92 shall be limited to 0.2 pounds per hour.

This condition, combined with conditions placed on the Bulk Railcar Loadout facility and the #2 Flash Dryer System, renders the requirements of PSD as not applicable for particulate matter and PM-10.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control devices.

Compliance Determination Requirements

D.3.4 Particulate Matter (PM)

The control devices for PM shall be in operation at all times that the equipment that it controls is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.6 Control Device Inspections

An inspection shall be performed at least semi-annually of all filters controlling the bins. All defective filters shall be replaced.

D.3.7 Visible Emissions Notations

- (a) Daily visible emission notations of the exhaust of the facility's stacks shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this facility shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

D.3.8 Broken or Failed Filter Detection

In the event that filter failure has been observed:

- (a) The affected bins will be shut down immediately until the failed filter has been repaired or replaced.
- (b) If appropriate, an investigation regarding the cause of failure will be conducted and an appropriate response will be initiated within 24 hours of discovery.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.9 Record Keeping Requirements

A record shall be kept of the results of the control device inspections and the number of filters replaced.

D.3.10 Reporting Requirements

There are no specific reporting requirements for this facility.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

The Bulk Railcar Loadout facility, with airflow of 2200 acfm. Particulate emissions are controlled by a baghouse, then exhaust to stack S/V #79.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2(e), the particulate matter emissions shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.4.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

Pursuant to Construction Permit 157-1872, issued on August 10, 1990 and amended on November 1, 1991:

- (a) PM and PM-10 emissions from the Bulk Railcar Loadout facility shall not exceed 0.15 pounds per hour of PM or PM-10.
- (b) On-stream time for the Bulk Railcar Loadout facility shall be limited to 4380 hours of operation per 12-month period, with compliance determined for the end of each month. For this facility, "on-stream time" is defined as the amount of time that the loadout blower is in operation.

This condition, combined with conditions placed on the #2 Flash Dryer System and Bins #20, #21 and #22, renders the requirements of PSD as not applicable for particulate matter and PM-10. Compliance with this condition will also satisfy 326 IAC 6-3-2.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.4.4 Particulate Matter (PM)

The control device for PM shall be in operation at all times that the equipment that it controls is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.6 Visible Emissions Notations

- (a) Daily visible emission notations of the exhaust of S/V #79 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this facility shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

D.4.7 Baghouse Inspections

An inspection shall be performed at least semi-annually of all bags controlling the facility. All defective bags shall be replaced.

D.4.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
- (b) If appropriate, an investigation regarding the cause of bag failure will be conducted and an appropriate response will be initiated within 24 hours of discovery.

Record Keeping Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.9 Record Keeping Requirements

- (a) Records shall be made and kept of the on-stream time per calendar month from this facility. These records are necessary to render 326 IAC 2-2 and 40 CFR 52.21 as not applicable.
- (b) The maximum production capacity of the Bulk Railcar Loadout facility, which has been claimed as confidential information, shall be kept at the emission source for the life of the facility.
- (c) All records other than maximum production capacity shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.10 Reporting Requirements

A quarterly summary of the information to document compliance shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. These quarterly reports are necessary to render 326 IAC 2-2 and 40 CFR 52.21 as not applicable.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: A. E. Staley Manufacturing Company
Source Address: 2245 N. Sagamore Parkway, Lafayette, Indiana 47904-1620
Mailing Address: 2200 E Eldorado St., Decatur, Illinois 62525
Source Modification No.: 157-14974-00003

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

- 9 Test Result (specify) _____
9 Report (specify) _____
9 Notification (specify) _____
9 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 DATA SECTION
 P.O. Box 6015
 100 North Senate Avenue
 Indianapolis, Indiana 46206-6015
 Phone: 317-233-5674
 Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: A. E. Staley Manufacturing Company
 Source Address: 2245 N. Sagamore Parkway, Lafayette, Indiana 47904-1620
 Mailing Address: 2200 E Eldorado St., Decatur, Illinois 62525
 Source Modification No.: 157-14974-00003

Months: _____ to _____ Year: _____

| | |
|--|-------------------------------|
| This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do 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". | |
| <input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. | |
| <input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: A. E. Staley Manufacturing Company
 Source Address: 2245 N. Sagamore Parkway, Lafayette, Indiana 47904-1620
 Mailing Address: 2200 E Eldorado St., Decatur, Illinois 62525
 Source Modification No.: 157-14974-00003
 Facility: #2 Flash Dryer System
 Parameter: On-stream time (hours of operation)
 Limit: 7534 hours per 12-month period, with compliance determined for the end of each month.

Months: _____ to _____ Year: _____

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

- 9 No deviation from the limit occurred in this quarter.
- 9 Deviations occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: A. E. Staley Manufacturing Company
Source Address: 2245 N. Sagamore Parkway, Lafayette, Indiana 47904-1620
Mailing Address: 2200 E Eldorado St., Decatur, Illinois 62525
Source Modification No.: 157-14974-00003
Facility: Bulk Railcar Loadout System
Parameter: On-stream time (hours of operation)
Limit: 4380 hours per 12-month period, with compliance determined for the end of each month.

Months: _____ to _____ Year: _____

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

- 9 No deviation from the limit occurred in this quarter.
- 9 Deviations 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

Addendum to the Technical Support Document (TSD) for a Significant Source Modification to a Part 70 Operating Permit

Source Background and Description

| | |
|---------------------------------|---|
| Source Name: | A. E. Staley Manufacturing Company |
| Source Location: | 2245 N Sagamore Parkway, Lafayette, IN 47904-1620 |
| County: | Tippecanoe |
| SIC Code: | 2046 |
| Operation Permit No.: | 157-11907-00003 |
| Operation Permit Issuance Date: | May 16, 2000 |
| Application No.: | 157-14974-00003 |
| Permit Reviewer: | Allen R. Davidson |

On October 10, 2002, the Office of Air Quality (OAQ) published in the *Lafayette Journal Courier* in Lafayette, Indiana, a notice stating that A. E. Staley Manufacturing Company (Staley) had applied for the addition of a fourth dewatering press and changing the airflow rates and operating temperatures of many emission units in order to accommodate a production increase at the #2 Flash Dryer System. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Written comments were received from A. E. Staley Manufacturing Company. Also, a petition was received signed by over 250 citizens of Lafayette, Indiana and five telephone callers gave comments.

The comments and responses appear below. Any adjustments to the permit are shown by the additions being in bold and the subtractions being in ~~strikeout~~. Since some comments are similar in nature, they have been grouped for one response.

Comment 1a:

Section A of the draft permit accurately reflects the emission units and pollution control equipment as described in Staley's permit application dated July 8, 2002. However, it should be noted that Sagamore plant management recently decided to change the identification for Bin #33 to recognize its exclusive utilization within the #2 starch flash dryer system. The new identification for the bin formerly recognized as Bin #33 is now Bin #23 (07V23). Only the tag number for the bin has been changed. None of the tag numbers for equipment associated with the bin, including the bin vent filter (07F33), has changed. Therefore, Section A.2 (b)(4) of the draft permit should be revised to read, "Starch Storage Bin #23".

Comment 1b:

Section D.3.2 needs to reference Bin #23 (formerly Bin #33) which is part of the #2 starch flash dryer system. Due to the tag number change described earlier, the reference to Bin #33 should read Bin #23 in the facility description of Section D.3 and throughout the Technical Support Document.

Response 1:

The bin identified as Starch Storage Bin #33 was initially approved by OAQ through Construction Permit 157-4160-00003, issued on April 5, 1995, to operate on the #3 Starch Flash Dryer System. The permit was later superseded by Construction Permit 157-9182-00003, issued on April 2, 1998, which modified the #3 Starch Flash Dryer System to increase product throughput and air flow rate.

Amendment 157-10447-00003, issued on 26, 1999, which changed permit language in Construction Permit 157-9182-00003 in response to an appeal of that approval by A. E. Staley. Amendment 157-15029-00003, issued on October 24, 2001, changed airflow rates on Starch Storage Bin #33.

The Part 70 permit application did not contain a reference to a Bin #23 with the designation 07V23. Therefore, A. E. Staley may change the designation of Bin #33 to Bin #23 (07V23).

The permit will be revised to read as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This source modification involves the following emission units and pollution control devices:

- (a) The #2 Flash Dryer System, consisting of:
- (1) One (1) starch flash dryer identified as Starch Flash Dryer #2, rated at 40 million Btu per hour, **with airflow of 110,000 acfm**. Dried starch is collected by six cyclones in parallel. Particulate emissions are controlled by a wet scrubber, then exhaust to stack S/V #73.
 - (2) One (1) grinding mill identified as Grinder Mill #1, **with airflow of 3600 acfm**. Particulate emissions are controlled by a baghouse, then exhaust to stack S/V #286.
 - (3) One (1) grinding mill identified as Grinder Mill #2, **with airflow of 3600 acfm**. Particulate emissions are controlled by a baghouse, then exhaust to stack S/V #287.
 - (4) One (1) Grinder Feed Collector. Particulate emissions are vented to the intake of the Starch Storage and Transfer Bin System.
 - (5) Starch Slurry Tanks, which exhaust to S/V #80.
 - (6) Four (4) dewatering presses and associated equipment, which exhaust to stack S/V #249 and S/V #250.
- (b) The Starch Storage and Transfer Bin System, consisting of:
- (1) Starch Storage Bin #20, **with airflow of 2100 acfm**. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #76.
 - (2) Starch Storage Bin #21, **with airflow of 2100 acfm**. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #77.
 - (3) Starch Storage Bin #22, **with airflow of 2100 acfm**. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #78.
 - (4) Starch Storage Bin ~~#33~~ **#23, with airflow of 2100 acfm**. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #267.
 - (5) Starch Storage Bin #34, **with airflow of 2900 acfm**. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #268.

- (6) Starch Storage Bin #35, **with airflow of 2900 acfm**. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #269.
- (7) Starch Transfer Bin #90, **with airflow of 2900 acfm**. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #345.
- (8) Starch Transfer Bin #91, **with airflow of 2900 acfm**. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #346.
- (c) The Bulk Railcar Loadout facility, **with airflow of 2200 acfm**. Particulate emissions are controlled by a baghouse, then exhaust to stack S/V #79.

D.3.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

- (a) Pursuant to Construction Permit 157-1872, issued on August 10, 1990 and amended on November 1, 1991, only one of Starch Storage Bins #20, #21 and #22 shall be loaded at any time.
- (b) **On-stream time for Starch Storage Bins #20, #21 and #22 shall be limited to 7534 hours of operation per 12-month period, with compliance determined for the end of each month. For these bins, "on-stream time" is defined as the amount of time that the #2 Flash Dryer System's dryer starch feed conveyor and the Starch Flash Dryer #2 fan are both in operation.**
- (c) **Pursuant to Construction Permit 157-9182-00003, issued on April 2, 1998 and amended on October 26, 1999 and October 24, 2001:**
 - (1) **particulate matter emissions from Starch Storage Bin #23 (formerly known as Starch Storage Bin #33, or 7V33) shall be limited to 0.2 pounds per hour.**
 - (2) **particulate matter emissions from Starch Storage Bin #34 shall be limited to 0.2 pounds per hour.**
 - (3) **particulate matter emissions from Starch Storage Bin #35 shall be limited to 0.2 pounds per hour.**
 - (4) **particulate matter emissions from Starch Transfer Bin #91 shall be limited to 0.2 pounds per hour.**
 - (5) **particulate matter emissions from Starch Transfer Bin #92 shall be limited to 0.2 pounds per hour.**

This condition, combined with conditions placed on the Bulk Railcar Loadout facility and the #2 Flash Dryer System, renders the requirements of PSD as not applicable for particulate matter and PM-10.

The change in bin designation is also acknowledged for the TSD, however, OAQ does not adjust the TSD directly. The original TSD is preserved as a historical record of the initial review when the permit went to public notice. Changes to the TSD are addressed in this addendum.

Comment 2:

Staley objects to Sections B and C of the draft permit to the extent that the B and C sections do not reflect the current language in the IDEM Title V Model permit. In order to expedite the issuance of this permit, Staley recommends, for purposes of this permit only, that Sections B and C be revised to incorporate the language of the current IDEM Title V Model permit.

Response 2:

The conditions in Section B and C will be updated to the current model conditions of the 10/28/02 version. The changes in language are shown below. (Condition number changes are not shown.)

B.1 ~~Permit No Defense [IC 13]~~

- ~~(a) Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7.~~
- ~~(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."~~

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

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

B.3 Enforceability [326 IAC 2-7-7(a)]

Unless otherwise stated, 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 citizens ~~under~~ **in accordance with** the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

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 2-7-5(6)(D)]

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

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) 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. **The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**
- (c) Upon request, and within a reasonable time thereafter, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAQ or the U.S. EPA to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish such confidential records directly to the U.S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) ~~The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:~~

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) **Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.**
 - (c) 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.
 - (d) **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.**

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall submit annually a compliance certification report which addresses the status of the source’s compliance with the terms and conditions contained in this

permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (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 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 compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3).
 - (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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[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 (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (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 PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an

additional ninety (90) days provided the Permittee notifies:

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

The PMP extension request does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) ~~Copies~~ **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. The PMPs do require certification by the "responsible official" as defined in 326 IAC 2-7-1(34).

B.12 Emergency Provisions [326 IAC 2-7-16]

- (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 2-7-16.~~
- (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 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 Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

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

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 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) ~~for sources subject to this rule after the effective date of this rule.~~ This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) 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 compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 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 materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

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

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 20(b)(2)] [326 IAC 20(c)(2)]

- (a) **This condition constitutes a permit shield as addressed in 326 IAC 2-7-15(b). Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield.**

- (b) ~~This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.~~ **Compliance The permit shield provides that compliance** with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
- (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) The permit shield is not applicable to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) The permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) The permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) The permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(7)]

~~B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any alleged exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an alleged exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

~~within ten (10) calendar days from the date of the discovery of the deviation:~~
using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. ~~It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~

~~(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee’s failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

- ~~(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).~~

- ~~(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)]

- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

- (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 2-7-4. 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).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
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 2-7 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 in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), 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) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (3) The Permittee notifies the:

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

and

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

- (4) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes 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 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraints of 326 IAC 2-7-20(a). The required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the applicable provisions of 326

IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6(2)]

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 Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, ~~at reasonable times,~~ any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, ~~at reasonable times,~~ substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.
[326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), 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 317-233-0425 (ask for OAQ, ~~Technical Support and Modeling~~ **I/M & Billing** Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 ~~if such modifications occur during the term of this permit.~~
- (b) **Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.**

C.1 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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.2 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.3 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. ~~The provisions of 326 IAC 9-1-2 are~~ **is** not federally enforceable.

C.4 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided **by statute or rule, or** in this permit, any air pollution control equipment required under Section D of this permit and used to comply with an applicable requirement shall be operated at all times that an emission unit vented to it is in operation.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. **The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.**

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

All demolition projects require notification whether or not asbestos is present.

- (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.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 14-10-4, 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) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. ~~The requirement that the inspector be Indiana accredited is not federally enforceable.~~ **The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR**

61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

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

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

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. ~~The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.~~ The protocol submitted by the Permittee does not require certification by the "responsible official" as defined in 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined in 326 IAC 2-7-1(34).
- (c) ~~All Pursuant to 326 IAC 3-6-4(b),~~ all test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

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.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

~~All~~ **Unless otherwise specified in this permit, all** monitoring and record keeping requirements not already legally required shall be implemented within one hundred eighty (180) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented until such time as the monitoring equipment is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt response steps shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring required by Section D of this permit shall be performed according to the

provisions of 326 IAC 3, 40 CFR 60, Appendix A, **40 CFR 60 Appendix B**, **40 CFR 63**, or other approved methods as specified in this permit.

C.13 Pressure Gauge Specifications

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

The Permittee may request that IDEM, OAQ approve use of a pressure gauge that does not meet the above specifications, provided the Permittee can demonstrate that the alternative specification will ensure compliance with permit conditions requiring the measurement of pressure drop.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

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

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance subject to 40 CFR 68 is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit to IDEM, OAQ:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); ~~and~~

~~(c) A verification to IDEM, OAQ that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.~~

~~All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

C.16 Compliance Response Plan - Preparation, Implementation, Records and Reports [326 IAC 2-7-5][326 IAC 2-7-6]

~~(a) The Permittee is required to implement a Compliance Response Plan (GRP) for each compliance monitoring condition of this permit. The GRP shall be submitted to IDEM, OAQ upon request. The GRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, maintained on site, and is comprised of response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit, and an expected time frame for taking reasonable response steps.~~

The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, ~~appropriate~~ **reasonable** response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, then IDEM, OAQ shall be promptly notified of the expected date of the shutdown, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of this permit, except as provided in part (c) below.

(c) The Permittee is excused from taking further response steps for any of the following

reasons:

- (1) A false reading occurs due to a malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned **or is returning** to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B - Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) If the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law to resolve noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement 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.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information 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 kept 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 within a reasonable time 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) ~~Records of required monitoring information shall include:~~
- ~~(1) The date, place, and time of sampling or measurements;~~
 - ~~(2) The dates analyses were performed;~~
 - ~~(3) The company or entity performing the analyses;~~
 - ~~(4) The analytic techniques or methods used;~~
 - ~~(5) The results of such analyses; and~~
 - ~~(6) The operating conditions existing at the time of sampling or measurement.~~
- (c) ~~Support information shall include:~~
- ~~(1) Copies of all reports required by this permit;~~
 - ~~(2) All original recordings for continuous monitoring instrumentation;~~
 - ~~(3) All calibration and maintenance records;~~
- (d) **All Unless otherwise specified in this permit, all** record keeping requirements not already legally required shall be implemented within one hundred eighty (180) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] **[326 IAC 2-1.1-11]**

- (a) ~~To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Compliance Monitoring Report with the reports required by conditions in Section D. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (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) ~~Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period. Such reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) ~~All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(f) Any response steps taken as a result of each deviation must be clearly identified in such reports.~~

~~(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. **Reporting periods are based on calendar years.**~~

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for

recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

Additionally, the Table of Contents has been adjusted for these changes.

Comment 3a:

Draft permit conditions for the #2 starch flash dryer, grinding mills #1 and #2, and bulk rail loadout system limit PM and PM-10 emissions in terms of concentration (grains per dscf) and airflow rather than the actual PM and PM10 emission rate in pounds per hour. Compliance with the process weight rate rule referenced in Sections D.2.1 and D.4.1 is based on pounds per hour of particulate emissions and PSD significance thresholds referenced in Sections D.2.2 and D.4.2 are triggered based on tons per year of particulate emissions.

There is no regulatory basis to require limitations on particulate concentration or airflow rate for sources addressed in the draft permit. Creating limits for these parameters in this draft permit then obligates IDEM to include unnecessary compliance monitoring conditions such as continuous airflow and temperature measurements. The airflows and particulate concentrations stated in the permit application and draft permit are maximum design rates used solely to calculate maximum hourly emission rates. An emission rate expressed in pounds per hour of PM and PM-10 accompanied by a restriction in operating hours (per Sections D.2.2(d) and D.4.2(b)) is the only emission limitation or standard needed to comply with applicable regulations.

Therefore, Staley requests that Sections D.2.2(a)-(c) and D.4.2(a) for the four affected emission sources be revised in accordance with the sample emission limitation condition shown below: "PM and PM-10 emissions from the Starch Flash Dryer #2 shall not exceed 3.30 pounds per hour of PM and PM-10."

Comment 3b:

As previously stated, Staley opposes the inclusion of airflow and particulate concentration limitations and concludes that mass emission rates are the only limitations specified in regulations applicable to the four affected emission sources. Therefore, requirements to continuously monitor airflow and temperature for compliance assurance purposes are unnecessary and do not provide useful information as to whether an affected emission source is in compliance with mass emission rates.

Comment 3c:

A physical modification of any process equipment including fans and blowers is subject to rigorous engineering review at the Sagamore facility including a review of potential permit implications of those changes. If a project is approved to increase the design capacity of a blower or fan, the increase in potential and actual emissions is reviewed to determine if a construction permit (i.e., source modification permit) is needed. A good example of this procedure is the requested increase in airflow for the #2 starch flash dryer ID fan addressed in this draft permit. For reasons stated above, Staley requests that Sections D.2.6(a)(1)-(2) and D.4.6(a)(1)-(2) be deleted in their entirety.

Response 3:

The limits will be adjusted to pounds per hour limits. For the Starch Flash Dryer #2, PM and PM₁₀ will be limited to 3.3 pounds per hour. For the Grinder Mill #1 and Grinder Mill #2, PM and PM₁₀ will be limited to 0.22 pounds per hour, each. For the Railcar Loadout facility, the PM and PM₁₀ emissions will be limited to 0.15 pounds per hour. Air flow rates have been added to the facility descriptions in Condition A.2 and Sections D as appropriate.

These limitations will be for the total of PM emissions, including any PM₁₀ emissions. There is not a separate limit for PM₁₀.

The following changes have been made to the permit:

D.2.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

Pursuant to Construction Permit 157-1872, issued on August 10, 1990 and amended on November 1, 1991:

- (a) PM and PM-10 emissions from the Starch Flash Dryer #2 shall not exceed ~~0.00374 grain per dry standard cubic foot (dscf). Also, the airflow rate shall not exceed 110,000 actual cubic feet per minute. At an average operating temperature of 105 degrees F or greater, these limits equate to a potential to emit 3.30 pounds per hour of PM or PM-10.~~
- (b) PM and PM-10 emissions from Grinder Mill #1 shall not exceed ~~0.008 grain per dry standard cubic foot (dscf). Also, the airflow rate shall not exceed 3,600 actual cubic feet per minute. At an average operating temperature of 140 degrees F or greater, these limits equate to a potential to emit 0.22 pounds per hour of PM or PM-10.~~
- (c) PM and PM-10 emissions from Grinder Mill #2 shall not exceed ~~0.008 grain per dry standard cubic foot (dscf). Also, the airflow rate shall not exceed 3,600 actual cubic feet per minute. At an average operating temperature of 140 degrees F or greater, these limits equate to a potential to emit 0.22 pounds per hour of PM or PM-10.~~
- (d) On-stream time for the #2 Flash Dryer System shall be limited to ~~7354~~ **7534** hours of operation per 12-month period, with compliance determined for the end of each month. For this facility, "on-stream time" is defined as the amount of time that the dryer starch feed conveyor and the Starch Flash Dryer #2 fan are both in operation.
- (e) The Grinder Feed Collector shall vent to the intake of the Starch Storage and Transfer Bin System.
- (f) ~~The baghouses which control Grinder Mill #1 and Grinder Mill #2 shall operate within a static pressure drop range established during the latest compliant stack test.~~

Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the flow rate of the wet scrubber controlling Starch Flash Dryer #2 shall be maintained at a minimum of 300 gallons of liquid per minute.

- (g) The #2 Flash Dryer System's pneumatic product conveyor, which was replaced with a screw conveyor, shall remain inoperative unless new approval is obtained.

This condition, combined with conditions placed on the Bulk Railcar Loadout facility and Bins #20, 21 and 22, renders the requirements of PSD as not applicable for particulate matter and PM-10. **Compliance with this condition will also satisfy 326 IAC 6-3-2.**

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Within 60 days after achieving the maximum production rate at which this facility will be operated, but not later than 180 days after the issuance of this permit, the Permittee shall perform PM and PM-10 testing on the Starch Flash Dryer #2 **and either** Grinder Mill #1 **and or** Grinder Mill #2 utilizing EPA methods approved by the Commissioner. ~~In the event that separate PM and PM-10 tests are not performed, PM-10 must be assumed at 100% of PM.~~ **Filterable PM-10 is assumed at 100% of filterable PM.**

This test shall be repeated at intervals no longer than five (5) years from the date of the previous compliance demonstration. PM-10 includes filterable and condensible PM-10.

D.2.6 Continuous Monitoring System

(a) ~~A continuous monitoring system shall be installed and shall be operated at all times when a facility that it is monitoring is in operation. The monitoring system shall continuously measure and record the following:~~

- ~~(1) Airflow rate for the Starch Flash Dryer #2, Grinder Mill #1, and Grinder Mill #2.~~
- ~~(2) Operating temperature for the Starch Flash Dryer #2, Grinder Mill #1, and Grinder Mill #2.~~
- ~~(3) On-stream on-stream time for the #2 Flash Dryer System.~~
- ~~(4) Total static pressure drop across the baghouses used in conjunction with Grinder Mill #1 and Grinder Mill #2.~~

A continuous monitoring system shall be installed and shall be operated at all times when Starch Flash Dryer #2 is in operation. The monitoring system shall continuously measure and record the flow rate of the wet scrubber controlling Starch Flash Dryer #2.

- (b) The instruments used for the continuous monitoring system shall comply with Section C of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.
- (c) A reading that is outside of range is not a deviation from this permit provided that response actions are taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports.

D.4.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

Pursuant to Construction Permit 157-1872, issued on August 10, 1990 and amended on November 1, 1991:

- (a) PM and PM-10 emissions from the Bulk Railcar Loadout facility shall not exceed ~~0.008~~ grain per dry standard cubic foot (dscf). Also, the airflow rate shall not exceed 2,200 actual cubic feet per minute. At an average operating temperature of 70 degrees F or greater, these limits equate to a potential to emit 0.15 pounds per hour of PM or PM-10.

(b) On-stream time for the Bulk Railcar Loadout facility shall be limited to 4380 hours of operation per 12-month period, with compliance determined for the end of each month. For this facility, "on-stream time" is defined as the amount of time that the loadout blower is in operation.

~~(c) The baghouse which controls the Bulk Railcar Loadout facility shall operate within a static pressure drop range established during the latest compliant stack test.~~

This condition, combined with conditions placed on the #2 Flash Dryer System and Bins #20, #21 and #22, renders the requirements of PSD as not applicable for particulate matter and PM-10. **Compliance with this condition will also satisfy 326 IAC 6-3-2.**

D.4.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

~~Within 60 days after achieving the maximum production rate at which this facility will be operated, but not later than 180 days after the issuance of this permit, the Permittee shall perform PM and PM-10 testing utilizing EPA methods approved by the Commissioner. In the event that separate PM and PM-10 tests are not performed, PM-10 must be assumed at 100% of PM.~~

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.6 Continuous Monitoring System

~~(a) A continuous monitoring system shall be installed and shall be operated at all times when the Bulk Railcar Loadout facility is in operation. The monitoring system shall continuously measure and record the following:~~

~~(1) Airflow rate for the Bulk Railcar Loadout facility.~~

~~(2) Operating temperature for the Bulk Railcar Loadout facility.~~

~~(3) On-stream time for the Bulk Railcar Loadout facility.~~

~~(4) Total static pressure drop across the baghouse used in conjunction with for the Bulk Railcar Loadout facility.~~

~~(b) The instruments used for the continuous monitoring system shall comply with Section C of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.~~

~~(c) A reading that is outside of range is not a deviation from this permit provided that response actions are taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports.~~

The changes made to Condition D.2.2, D.2.5, D.2.6, D.4.2 and D.4.5 are also discussed elsewhere in this addendum.

Comment 4:

The Sagamore facility has literally hundreds of emission sources. Most of these sources are controlled by bag filters such as small product transfer systems and bin vents. Compliance monitoring conditions in this draft permit may only affect a small number of emission sources; however, these conditions set a precedent for future permitting decisions by IDEM that could result in unmanageable and unnecessary recordkeeping requirements especially when applied plant-wide in a Part 70 permit. In

order to assure a consistent approach in compliance monitoring conditions, it has been necessary for Staley to appeal several recent permits in order to reduce reporting burdens without sacrificing compliance assurance. For instance, in response to an appeal resolution, minor source modification permit 157-11907-00003 authorizing construction of a spray agglomerator system was amended on December 14, 2001 (157-15026-0003) to remove conditions related to measurement of static pressure drop across the bagfilter. Conditions related to visible emissions notations and operation of the bagfilter were also revised to reflect language agreed upon in a previous appeal resolution of the construction permit authorizing modification of the #3 flash dryer system (see Amendment A 157-10447 to CP 157-9182 dated October 26, 1999).

These appeals have led to agreements consisting of mutually acceptable permit conditions to IDEM and Staley, but the process has been time-consuming. It was hoped that these previous agreements would be used as the foundation for developing permit conditions for similar emissions sources and control devices (i.e. bagfilters) at Staley's facilities. Substantial deviations from these prior agreements, which may include unnecessary and burdensome compliance assurance monitoring requirements, will continue to be resisted by Staley for the same reasons they were resisted in recent appeals.

Response 4:

Construction Permit CP 157-9182, issued on April 2, 1998, modified the #3 Starch Flash Dryer System to increase product throughput and air flow rate. It was written under the old permit review rules, 326 IAC 2-1. The permit review rules were substantially overhauled, effective December 25, 1998. Compliance monitoring which was sufficient under the old rules are not necessarily adequate under the revised rules.

Minor Source Modification 157-11907-00003, issued on May 16, 2000, approved one (1) spray agglomeration system and a new blender receiver product collector system. This application involves a Significant Source Modification with limits intended to avoid Prevention of Significant Deterioration (PSD). Therefore, this application will necessarily require more compliance monitoring than Minor Source Modification 157-11907-00003.

Comment 5a:

During a recent meeting between Staley and IDEM, additional compliance monitoring conditions included in the draft permit were justified by OAQ Permit Branch staff as necessary to ensure actual emission rates of equipment included in the permit did not exceed a total of 15 tons per year of PM. With the exception of the flash dryer scrubber, all equipment addressed in the draft permit utilizes bagfilters as control devices integral to the process. Therefore, potential emissions are equivalent to actual emissions (i.e., uncontrolled emissions are equal to actual emissions after the bagfilter). Staley maintains these control devices are integral to the process as described below and should therefore be exempt from compliance monitoring conditions related to the control device itself (e.g., static pressure drop).

Comment 5b:

Dry starch products are pneumatically conveyed throughout the facility to product receivers and storage bins. Historically, all control devices used as product collectors or receivers, including the grinder mill collector bagfilters and rail loadout receiver bagfilter addressed by this permit, have been classified as an integral part of the system. It is in Staley's best business interest to collect and recycle as much starch material as possible as this is the saleable product produced by the #2 starch flash dryer system. These bagfilter units generally provide a 99.9+% collection efficiency and are relatively insensitive to changes in loadings making them the best available equipment for handling of fine particulate products. At the Sagamore facility, dry starch products and miscellaneous raw materials (i.e., filter aid, soda ash, etc.) are stored in large storage bins. Each bin is equipped with a bin vent. The bin vent is a necessary piece of equipment. The primary purposes of the bin vent filter are to minimize product loss (bin vent

filters have a particulate matter control efficiency of 99.9+%) and neutralize bin pressure during filling, fluidization and emptying of the bin. Without the presence of the bin vent filter, the bin itself could not be utilized.

Response 5:

Emission calculations were performed for all emission units after the control devices, including Starch Flash Dryer #2 since previous federally-enforceable permits required the control devices. Any changes in compliance monitoring will be the result of other comments addressed elsewhere in this addendum.

Comment 6:

On September 8, 1994, USEPA published the proposed Standards of Performance for New Stationary Sources of Starch Production Plants (59FR46381). In this proposed standard, the agency detailed monitoring requirements for dry control devices (bagfilters) in starch transfer, storage and handling facilities. The standard stated the opacity of the stack would be observed once per week for visible emissions. Requirements for pressure drop measurements across bagfilters were not included in this NSPS. This proposed standard was later withdrawn (61FR54377). USEPA withdrew the NSPS after concluding that promulgation of such a standard would achieve little or no emission reduction from starch facilities. As part of the rationale for withdrawing the standard, the agency published the following statement "It is, however, not the current practice of the starch industry, if indeed it ever was, to allow uncontrolled emissions of starch. As discussed below, starch facilities have an economic incentive to minimize losses of their product, starch, by recapturing emissions of starch dust to the extent possible in order to remain competitive."

Response 6:

OAQ acknowledges that there are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source modification. There are no standards expressly applicable to starch manufacturing, and this source is not subject to the "Standards of Performance for Grain Elevators" since grain storage capacity is less than 1,000,000 bushels.

Compliance monitoring issues are addressed elsewhere in this addendum.

Comment 7:

Page 36 of the draft permit (Emergency/Deviation Occurrence Report) requires deviations to be reported in writing to IDEM within 10 calendar days. The most recent IDEM Title V Model permit requires only quarterly deviation reports. Staley requests this form be modified so that it reflects IDEM's most recent Title V Model permit.

Response 7:

The change, which combines the deviation reporting form and the compliance monitoring report form into a single form, was made to the permit.

Comment 8:

Staley remains opposed to either periodic or continuous monitoring of static pressure drop for product collectors and bin vent filters for several technical reasons.

It is common practice in our industry to use baghouses for the pneumatic conveying of a product. For this reason, the inlet grain loading of the unit is very high when compared to a baghouse operated solely for pollution control purposes. It has been Staley's experience that if static pressure drop gauges are installed on bagfilters that have very high inlet loadings, the taps to the gauges may plug with starch making the instruments unavailable for monitoring purposes until the lines are cleaned out. This is especially true for baghouses controlling high humidity air streams located outdoors where the upstream lines to the gauges are susceptible to condensation of moisture.

Baghouse pressure drop is a function of air to cloth ratio, bag material, cake thickness, inlet loading and cleaning frequency plus the characteristics (e.g., "stickiness") of the product being conveyed and controlled. The air to cloth ratio, bag material and cleaning frequency are fixed, however the dryer operates at different rates and dries different products which will in turn have different effects on the filter cake thickness as starch is conveyed through the system. For this reason, the pressure drop range can vary dramatically depending on the rate of the dryer and the type of starch being dried. The combination of these variables makes the correlation of acceptable pressure drop ranges to compliance with emission limits difficult. Staley strongly believes the pressure drop range is not an effective means of monitoring the operational efficiency of a baghouse. It is very possible a baghouse could be operating outside the specified pressure drop range and still be in full compliance with the allowable emission limit.

Conversely, because most emission problems are caused by torn, damaged or improperly installed bag(s), it is very likely that a baghouse could be operating within the specified pressure drop range and not be in full compliance with the allowable emission limit. In most excess emission situations, only a few bags in a baghouse become damaged. Therefore, the change in the bagfilter static pressure drop is negligible. Thus, the emission source could exceed emission limitations, but the bagfilter static pressure drop would not indicate this condition and would be within the prescribed pressure drop range. Staley has determined this method of compliance monitoring for bagfilters in use at the Sagamore facility is not suited for the goal intended and will yield erroneous conclusions regarding compliance status of the emission source. Instead, Staley believes visual monitoring is the most suitable means to determine compliance while introducing the least potential for error.

Daily visual emission observations provide an accurate representation as to the operating condition of a starch product receiver or bin vent filter. Visual observation can quickly ascertain if a baghouse is leaking (from a torn, damaged or improperly installed bag or cartridge). Starch is a highly visible substance making malfunctions of baghouses easily noticeable by visual inspections. Therefore, daily visible emissions notation of bagfilter units addressed in this draft permit is more than satisfactory to meet compliance monitoring requirements. Staley considers any increase in visible emissions from a bagfilter to be an indication of a malfunction regardless of pressure drop. In terms of demonstrating compliance for these types of sources, Staley believes the only acceptable way to determine if there is a problem is through visible emission inspections. Pressure drop ranges correlated to actual emission rates is in no way as reliable as direct visual examination. Thus, requirements to monitor bagfilter pressure drop are duplicative, burdensome, inconclusive and unnecessary.

Response 8:

The following changes have been made to the permit:

D.2.7 Visible Emissions Notations

-
- (a) Daily visible emission notations of the exhaust of S/V #73, #286 and #287 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this ~~unit~~ **facility** shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

~~D.4.7~~ **D.4.6** Visible Emissions Notations

- (a) Daily visible emission notations of the exhaust of S/V #79 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this ~~unit~~ **facility** shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

Since a similar requirement exists in Construction Permit 157-9182-00003, as amended, the Part 70 version of the requirement has been added and subsequent condition numbers have been changed:

D.3.7 Visible Emissions Notations

- (a) **Daily visible emission notations of the exhaust of the facility's stacks shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.**
- (b) **For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.**
- (c) **In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.**
- (d) **A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.**

- (e) The Compliance Response Plan for this facility shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.**
-

Comment 9:

The draft permit requires the grinding mill bagfilters and rail loadout bagfilter to operate within a static pressure drop range established during a particulate emission test. This requirement should be similarly deleted if the requirement to continuously monitor static pressure drop is removed from the draft permit.

Response 9:

The requirements to continuously monitor static pressure drop range were removed the grinding mill bagfilters and rail loadout bagfilter. The units have relatively low air flow rates, so monitoring can be done less frequently than continuously. As a result, the requirements to maintain static pressure drop within a range have been removed from Condition D.2.2 and D.4.2 for these emission units. See Response 3 for an illustration of the changes.

Comment 10:

A requirement for semi-annual inspections of the scrubber exists in the previously mentioned #3 starch flash dryer permit. Staley recommends a similar requirement be added to this draft permit. The scrubber does not have any moving parts; therefore, the value of more frequent inspections is questionable. The semi-annual inspections along with the continuous monitoring of the scrubbant flow rate and daily visible emission observations provide more than adequate means of ensuring proper operation of the scrubber. Staley recommends that Section D.2.6 be revised to include a requirement to continuously monitor scrubbant recycle flow rate to ensure the flow rate of the centrifugal scrubber is maintained above a minimum rate of 300 gallons of liquid per minute. In addition, Staley proposes the scrubber be subject to semi-annual inspections.

Response 10:

This change is acceptable. Section D.2 will be formatted to mimic the condition used for Starch Flash Dryer #3. Additionally, a condition will be added to maintain the flow rate at 300 gallons per minute and to record that information. See Response 3 for an illustration of the changes.

In addition, the following changes have been made to the permit:

D.2.8 Baghouse Control Device Inspections

An inspection shall be performed at least semi-annually of all bags controlling the grinding mills All defective bags shall be replaced.

- (a) An inspection shall be performed at least semi-annually of the wet scrubber controlling Starch Flash Dryer #2. All defective parts shall be replaced.**

D.2.10 Record Keeping Requirements

- ~~(a) To document compliance with Condition D.2.2, records shall be made and kept of the following:~~

- ~~(1) Airflow rates for the Starch Flash Dryer #2, Grinder Mill #1, and Grinder Mill #2.~~

-
- ~~(2) Operating temperatures for the Starch Flash Dryer #2, Grinder Mill #1, and Grinder Mill #2.~~
-
- ~~(3) On-stream time for the #2 Flash Dryer System, per calendar month and per 12-month period.~~
-
- ~~(4) Total static pressure drop across the baghouses used in conjunction with Grinder Mill #1 and Grinder Mill #2.~~

To document compliance with Condition D.2.2, records shall be made and kept of the scrubbant flow rates for the wet scrubber controlling Starch Flash Dryer #2.

These records are necessary to render 326 IAC 2-2 and 40 CFR 52.21 as not applicable.

- (b) The maximum production capacity of the #2 Flash Dryer System, which has been claimed as confidential information, shall be kept at the emission source for the life of the facility.
- (c) All records other than maximum production capacity shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 11a:

Particulate emission tests are required for the flash dryer, grinder mill bagfilters and rail loadout bagfilter. Staley assumes that 100% of the PM is PM₁₀ for these emission units.

Comment 11b:

The grinder mill bagfilters are identical systems and collectors; therefore, no purpose is served by testing both bagfilters.

Response 11:

Conditions D.2.5 and D.4.5 have been changed to state that filterable PM₁₀ is assumed at 100% of filterable PM, that total PM₁₀ includes both filterable and condensable PM₁₀, and that testing is required on only one of the grinder mills. See Response 3 for an illustration of the changes.

Comment 12:

A problem exists with particulate emission testing of the rail loadout bagfilter. It takes about three hours to load a railcar at the maximum capacity of the rail loadout system. It will thus be extremely difficult to perform three one-hour particulate emission tests without additional rail cars being needed. The loadout system would need to be shut down while the rail cars are moved assuming another railcar is available and scheduled to be filled. It should be noted that the system runs less than 50% of the time making the scheduling of emission testing difficult.

Response 12:

The testing requirement for the Bulk Railcar Loadout facility will be removed because the facility does not meet criteria that would normally warrant stack testing under current OAQ policy. OAQ reserves the authority to require a test if emissions from the #2 Flash Dryer System raise concerns whether limits placed to avoid PSD have been exceeded.

See Response 3 for an illustration of the changes.

Comment 13:

Staley has performed emission tests on three starch product collectors or bin vent filters in the last six years (Tote Packer #3, Starch Feed Bin 33-V1, and Starch Blending Bin 33-V43). These emission tests ranged from 0.001 gr/dscf to 0.005 gr/dscf thus supporting Staley's predicted emission rate of 0.008 gr/scf for units in this draft permit. Thus, a requirement to test all three bagfilters is unnecessary, especially in light of the testing difficulties described above.

Response 13:

At this time, OAQ is not requiring tests for Tote Packer #3, Starch Feed Bin 33-V1, Starch Blending Bin 33-V43, or any of the storage and transfer bins listed in this permit.

Comment 14:

Recordkeeping requirements in Sections D.2.10(a)(1),(2)&(4) are unnecessary and should be deleted if requirements to monitor airflow rates, operating temperatures and bagfilter static pressure drop are removed from the draft permit.

Response 14:

The appropriate adjustments were made to the conditions, upon the determinations made in responses elsewhere in this addendum. See Response 10 for an illustration of the changes.

Comment 15:

It is objectionable to be required to maintain records of maximum production capacity of the #2 starch flash dryer system and bulk railcar loadout system for the life of the facility. The format of the record that is to be maintained for the life of the facility is also vague. The permit application contains sufficient information regarding production capacities of individual emission units. Maximum production capacity was claimed as confidential information; however, airflow and particulate concentrations were used to determine applicable emission limitations in the permit. Production based emission factors were not used. With the exception of performing emission tests at maximum production capacity, compliance monitoring requirements are not dependent on this confidential information.

In order to satisfy IDEM's concerns, Staley would not object to a requirement to maintain a confidential copy of the [significant] source modification permit application at the Sagamore facility, which describes maximum confidential production capacities for these emission units.

Response 15:

A.E. Staley has requested that the IDEM treat the maximum production rates of the facilities as confidential information under 326 IAC 17.1-4. The department has not made a final determination whether this information is entitled to be treated as confidential under IC 5-14-3 and 326 IAC 17.1-4. However, the department is treating the information as confidential pending a final determination. The requirement for A.E. Staley to keep records of the maximum production rate at the source is intended to protect the confidentiality of the information by limiting the circulation of that information. Therefore the requirements of D.2.10(b) and D.4.10(b) will remain in the permit. Maintaining a copy of the version of the application that has been claimed as confidential at the facilities will satisfy the requirements of these conditions.

Comment 16:

Particulate emission limitations have been included in the draft permit that are far below emissions allowed under the process weight rate rule (326 IAC 6-3-2(e)) at maximum production capacities. Therefore, process weight rate-based emission limits should be considered to be superseded by the concentration-based limitations in the draft permit.

Response 16:

OAQ acknowledges that compliance with the limits placed in Conditions D.2.2 and D.4.2 will also satisfy 326 IAC 6-3-2. A statement was placed into the conditions stating such. See Response 3 for an illustration of the changes.

Comment 17:

There is an error in Section D.2.2(d) that should read 7534 hours year (86% O.S.T) instead of 7354 hours per year. This error should also be corrected on page 39 of the permit (Part 70 Quarterly Report). The reason for this discrepancy was described in an e-mail note on October 24, 2002. In this e-mail, Staley requested the calculations in Appendix A of the Technical Support Document be revised with a restriction of 7534 hours per year for the entire #2 starch flash dryer system which includes the dryer, two grinding mills, and four storage bins.

Response 17:

When the two grinder mills and the three bins that are original to the #2 Flash Dryer System are limited along with the Starch Flash Dryer #2, the limit may increase to 7534 hours per year. See Response 1 and Response 3 for an illustration of the changes. (Bin #23, formerly known as Bin #33, was originally approved for the #3 Flash Dryer System and has different requirements.)

Comment 18:

Staley requests clarification in Section D.3.6 (Control Device Inspections) as to whether the inspection requirements apply to the starch storage bins listed in D.3.2 or all of the bins listed in the facility description of D.3. Semi-annual inspection requirements already exist for storage bins #34, #35, #91, and #92 in the #3 starch flash dryer permit.

Response 18:

The requirements of Condition D.3.6 apply to all bins listed in the facility description box at the beginning of Section D.3. This includes Bins #34, #35, #91, #92, and any other bins that may be added into Section D.3 in the future.

Comment 19:

It should be noted that the product transfer blower (40C31) for the #2 flash dryer system cannot fill bins #34, #35, #91, and #92 because there are no product transfer lines connecting these bins to blower 40C31.

Response 19:

A. E. Staley has the capability to reallocate the bins between the #2 Flash Dryer System and the #3 Flash Dryer System by merely redirecting product transfer lines. In fact, A. E. Staley has done so at least twice in the past, once without notifying OAQ of the change, and is proposing such a change in this application. (Under the old permit review rules, redirecting product transfer lines did not require notification if emissions were unaffected.)

Comment 20:

Only one of the four #2 starch flash dryer bins (#20, #21, #22, or #23) can be filled at a time using blower 40C31. The second paragraph on page 4 of the Technical Support Document should reflect this fact.

Response 20:

If this application is approved, A. E. Staley will redirect the exhaust from the Grinder Feed Collector to the intake of the Starch Storage and Transfer System blower 40C31. The Grinder Feed Collector has airflow of 1700 acfm and the blower 40C31 has airflow of 2100 acfm. This results in a combined air flow rate of 3800 acfm. Furthermore, each of bins #20, #21, #22, or #23 is equipped with its own bin vent fan of an unknown airflow rate. With bin vents rated at a maximum air flow rate of only 2100 acfm, there is evidence for OAQ to believe that A. E. Staley will be technically able to operate at least two of Bins #20, #21, #22, or #23 simultaneously if the application is approved.

Comment 21:

In the first paragraph on page 8 of the Technical Support Document, it states that emissions from Bins #20, #21, and #22 are limited to 0.1 tons per year particulate matter. This number is in error and does not reflect the emission rates calculated in the permit application or in Appendix A of the TSD.

Response 21:

The correct number should be 1.0 tons per year. Provided that only one of Bins #20, #21, and #22 operate at a time, the bins comply with the limit.

Comment 22:

The very concerned citizens request that IDEM deny the application of A. E. Staley that will accommodate a production increase.

(A) The combined Staley operations have been designated by EPA data to be the greatest contributor to airborne carcinogenic emissions in Tippecanoe County.

(B) The noxious odor of the Staley emissions has a depressing effect on health, the quality of life, and real estate values in this community.

(C) Staley has not kept its previous promise, made at a March 29, 2000 public hearing, to use the profits from a 25% production increase, which was granted in the year 2000 to clean up its emissions. The odors from its emissions are now even more pervasive.

Response 22:

OAQ has no specific federal or state authority to regulate noise or odors. It does not have the authority to impose a moratorium on increased emissions, or to deny a permit based on noise or odors.

Also, OAQ cannot at present take into account property values and city planning when making decisions, since property values and city planning do not affect emission levels. Statute IC 13-14-8-4 grants the Air Pollution Control Board authority to consider the effect of zoning classifications and the reasonable enjoyment of life and property, but unless the Air Pollution Control Board adopts a rule or establishes a standard by one means or another, IDEM does not have regulatory authority.

The Indiana Air Pollution Control Board generally meets on the first Wednesday of every month. Any person may present written proposals for the adoption, amendment, or repeal of a rule by the board. A proposal presented under this section must be supported by a statement of reasons; and accompanied by a petition signed by at least two hundred (200) persons. If the board finds that the proposal is not plainly devoid of merit and does not deal with a subject on which a hearing was held within the previous six (6) months; the board shall give notice and hold a hearing on the proposal.

The March 29, 2000 public hearing involved the South plant, located at 3300 U.S. 52 South. This application involves the Sagamore plant, located at 2245 North Sagamore Parkway. There is some legal authority to regulate the odor control devices on the South plant's wastewater treatment plant due to an agreed order signed by Staley and IDEM in 1996. However, no such authority exists for the Sagamore plant.

Because OAQ has determined that A. E. Staley has complied with all of the state and federal requirements for obtaining an air permit, state law requires that the permit be issued. The permit establishes all of the legal requirements, including provisions that ensure that information is available to demonstrate whether A. E. Staley is in compliance on a day-to-day basis.

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

**Technical Support Document (TSD) for a
Significant Source Modification to a Part 70 Operating Permit**

Source Background and Description

| | |
|--|--|
| Source Name: | A. E. Staley Manufacturing Company |
| Source Location: | 2245 North Sagamore Parkway, Lafayette, IN 47904-1620 |
| County: | Tippecanoe |
| SIC Code: | 2046 |
| Operation Permit No.: | 157-11907-00003 |
| Operation Permit Issuance Date: | May 16, 2000 |
| Application No.: | 157-14974-00003 |
| Permit Reviewer: | Allen R. Davidson |

On October 23, 2001, the Office of Air Quality (OAQ) received an application from A. E. Staley Manufacturing Company. The application seeks addition of a fourth dewatering press and changing the airflow rates and operating temperatures of many emission units in order to accommodate a production increase at the #2 Flash Dryer System.

This application involves the operation of the following facilities:

- (a) The #2 Flash Dryer System, consisting of:
- (1) One (1) starch flash dryer identified as Starch Flash Dryer #2, rated at 40 million Btu per hour. Dried starch is collected by six cyclones in parallel. Particulate emissions are controlled by a wet scrubber, then exhaust to stack S/V #73.
 - (2) One (1) grinding mill identified as Grinder Mill #1. Particulate emissions are controlled by a baghouse, then exhaust to stack S/V #286.
 - (3) One (1) grinding mill identified as Grinder Mill #2. Particulate emissions are controlled by a baghouse, then exhaust to stack S/V #287.
 - (4) One (1) Grinder Feed Collector. Particulate emissions are vented to the intake of the Starch Storage and Transfer Bin System.
 - (5) Starch Slurry Tanks, which exhaust to S/V #80
 - (6) Four (4) dewatering presses and associated equipment, which exhaust to stacks S/V #249 and S/V #250.
- (b) The Starch Storage and Transfer Bin System, consisting of:
- (1) Starch Storage Bin #20. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #76.
 - (2) Starch Storage Bin #21. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #77.
 - (3) Starch Storage Bin #22. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #78.

- (4) Starch Storage Bin #33. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #267.
 - (5) Starch Storage Bin #34. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #268.
 - (6) Starch Storage Bin #35. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #269.
 - (7) Starch Transfer Bin #90. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #345.
 - (8) Starch Transfer Bin #91. Particulate emissions are controlled by a bin vent filter, then exhaust to stack S/V #346.
- (c) The Bulk Railcar Loadout facility. Particulate emissions are controlled by a baghouse, then exhaust to stack S/V #79.

History

A. E. Staley Manufacturing Company submitted a Part 70 permit application for a corn processing plant on May 31, 1996. This application shall be incorporated in the submitted Part 70 application.

The emission source has since received the following approvals and amendments:

- (a) Exemption 157-6014-00003, issued on July 9, 1996, approved the replacement of the #2 Flash Dryer System's pneumatic product conveyor with a screw conveyor.
- (b) Exemption 157-8071-00003, issued March 7, 1997.
- (c) Amendment 157-8077-00003, issued December 3, 1997, amends Operation Permit 79-08-89-0354 to require a continuous emission monitoring system on Boiler 31B-1 pursuant to an agreed order.
- (d) Construction Permit 157-9182-00003, issued on April 2, 1998, which modified the #3 Starch Flash Dryer System to increase product throughput and air flow rate.

Amendment 157-10447-00003, issued on 26, 1999, which changed permit language in Construction Permit 157-9182-00003 in response to an appeal of that approval by A. E. Staley.

Amendment 157-15029-00003, issued on October 24, 2001, which approved two new product storage bins #91 and #92, and changed airflow rates on three existing storage bins listed in Construction Permit 157-9182-00003.

- (e) Construction Permit 157-10232-00003, issued on October 12, 1999, approved two (2) new propylated starch reactors and a new control device for new and existing propylated starch reactors.

Amendment 157-12715-00003, issued on October 12, 2000, changed permit language in Construction Permit 157-10232-00003 in response to an appeal of that approval by A. E. Staley.

- (f) Minor Source Modification 157-11907-00003, issued on May 16, 2000, approved one (1) spray agglomeration system and a new blender receiver product collector system.

Amendment 157-15026-00003, issued on December 14, 2001, changed permit language in Minor Source Modification 157-11907-00003 in response to an appeal of that approval by A. E. Staley.

Enforcement Issues

There are no enforcement actions pending against this emission source.

Stack Summary

The following stacks will be affected by this application:

| Stack ID | Operation | Height (feet) | Diameter (feet) | Flow Rate (acfm) | Temperature (°F) |
|----------|--|---------------|-----------------|------------------|------------------|
| 73 | Starch Flash Dryer #2 | 120 | 8.17 | 110,000 | 105 |
| 76 | Bin # 20 | 70 | 1.08 | 2,100 | 80 |
| 77 | Bin # 21 | 70 | 1.08 | 2,100 | 80 |
| 78 | Bin # 22 | 70 | 1.08 | 2,100 | 80 |
| 79 | Bulk Railcar Loadout | 40 | 0.40 | 2,200 | 70 |
| 80 | Starch Slurry Tanks | 80 | 1.50 | 2,600 | 100 |
| 249 | Starch Slurry Dewatering Process Equipment | 70 | 1.17 | 2,500 | 110 |
| 250 | Starch Slurry Dewatering Process Equipment | 30 | 0.67 | ~1,000 | 100 |
| 267 | Bin # 33 | 80 | 1.38 | 2,100 | 80 |
| 268 | Bin # 34 | 80 | 1.38 | 2,100 | 80 |
| 269 | Bin # 35 | 80 | 1.38 | 2,100 | 80 |
| 286 | Grinder Mill # 1 | 5 | 1.17 | 3,600 | 140 |
| 287 | Grinder Mill # 2 | 5 | 1.17 | 3,600 | 140 |
| 345 | Bin # 90 | 80 | 1.38 | 2,900 | 70 |
| 346 | Bin # 91 | 80 | 1.38 | 2,900 | 70 |

S/V 288, the exhaust from the Grinder Feed Collector, will be rerouted to the intake of the transfer blower for Bins # 20, 21 and 22, thus eliminating the emission point.

Recommendation

The staff recommends to the Commissioner that the revision be approved as a significant source modification. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 23, 2001.

Emission Calculations

The application seeks addition of a fourth dewatering press and changing the airflow rates and operating temperatures of many emission units in order to accommodate a production increase at the #2 Flash Dryer System.

The new dewatering press itself has no PM emissions. VOC emissions are the result of propylene oxide usage at other facilities. Propylene oxide usage is limited to 15,000 tons per 12-month period and controlled by a packed bed scrubber rated at 95% reduction efficiency under Construction Permit 157-10232-00003, issued on October 12, 1999 and amended on October 12, 2000. These requirements will not change.

Emissions from Starch Storage Bins #34 and #35, and Starch Transfer Bins #91 and #92 are being unchanged. Because A. E. Staley has demonstrated that bins originally designated for the #3 Flash Dryer System can be used to store product for the #2 Flash Dryer System, and vice versa, the storage and transfer bins must be considered as a single facility that can operate independently of the flash dryer systems.

Usage of the Bulk Railcar Loadout facility will be unchanged. A. E. Staley has agreed to a limit on this facility to bring PM-10 emissions from Construction Permit 157-1872, issued on August 10, 1990 and amended on November 1, 1991, below 15 tons per year. This facility was initially approved for construction by that construction permit along with the #2 Flash Dryer System.

See Appendix A of this document for detailed emissions calculations. (8 pages)

Potential To Emit

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

The following table reflects the existing source potential to emit. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit:

| Pollutant | Potential To Emit (tons/year) |
|-----------------|-------------------------------|
| PM | 714 |
| PM-10 | 714 |
| SO ₂ | 1,808 |
| VOC | 702 |
| CO | 77 |
| NO _x | 581 |

| HAP's | Potential To Emit (tons/year) |
|--------|-------------------------------|
| Single | greater than 10 |
| Total | greater than 25 |

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of criteria pollutants are equal to or greater than 100 tons per year. The potential to emit a single hazardous air pollutant (HAP) is equal to or greater than ten (10) tons per year and the potential to emit a combination of HAP is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

This existing source is a major source for Prevention of Significant Deterioration, 326 IAC 2-2. It is in one of the 28 source categories and pollutants have the potential to emit at a rate of 100 tons per year or more.

The revision's potential to emit, before controls and limits, is as follows:

| Pollutant | Potential To Emit (tons/year) |
|-----------------|-------------------------------|
| PM | 40.3 |
| PM-10 | 40.3 |
| SO ₂ | 0 |
| VOC | 0 |
| CO | 0 |
| NOx | 0 |

| HAP | Potential To Emit (tons/year) |
|-------|-------------------------------|
| TOTAL | 0 |

* PM and PM-10 emissions are calculated based on the increase allowed under 326 IAC 6-3-2 between the old production maximum and the new production maximum. Due to confidentiality claims, the calculations do not appear in Appendix A.

The potential to emit (as defined in 326 IAC 2-7-1(29)) particulate matter (PM) is greater than 25 tons per year, and the potential to emit PM-10 is greater than 15 tons per year. Therefore, the revision is classifiable as a significant source modification under 326 IAC 2-7-10.5.

The revision's potential to emit after controls and limits is follows:

| Pollutant | Potential To Emit (tons/year) | PSD Significant Level (tons/yr) |
|-----------------|-------------------------------|---------------------------------|
| PM | 0* | 25 |
| PM-10 | 0* | 15 |
| SO ₂ | 0 | 40 |
| VOC | 0 | 40 |
| CO | 0 | 100 |
| NOx | 0 | 40 |

| HAP | Potential To Emit (tons/year) | PSD Significant Level (tons/yr) |
|-------|-------------------------------|---------------------------------|
| TOTAL | 0 | n/a |

* There will be no PM or PM-10 increase due to new federally enforceable usage limits on the facilities in Construction Permit 157-1872. The reduced number of hours of operation offsets increases in hourly emissions.

This modification is not a major modification for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 because the net increase in potential to emit every attainment pollutant is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the emission data submitted to OAQ for year 2000:

| Pollutant | Actual Emissions (tons/year) |
|-----------------|------------------------------|
| PM | 225 |
| PM-10 | 225 |
| SO ₂ | 1,383 |
| VOC | 598 |
| CO | 66 |
| NOx | 540 |

County Attainment Status

The source is located in Tippecanoe County.

| Pollutant | Status |
|-----------------|------------|
| PM-10 | attainment |
| SO ₂ | attainment |
| NO ₂ | attainment |
| Ozone | attainment |
| CO | attainment |
| Lead | attainment |

Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Tippecanoe County has been designated as attainment or unclassifiable for ozone and for all other pollutants. Therefore, emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. This source is not subject to the "Standards of Performance for Grain Elevators" since grain storage capacity is less than 1,000,000 bushels.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

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

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control). The source was existing as of July 27, 1997, this modification is not classified as a reconstruction under 40 CFR 63.41, and the new construction does not by itself have potential to emit HAPs.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of pollutants listed in the rule. Pursuant to this rule, the source must annually submit an emission statement for the source. The annual statement must contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) 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.

State Rule Applicability - #2 Flash Dryer System

326 IAC 6-3-2 (Particulate Emissions Limitations)

This facility is subject to 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations), particulate matter (PM) emissions shall be limited by the following equation for process weight rates up to sixty thousand (60,000) pounds per hour:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

An emission calculation does not appear in Appendix A due to claims of confidentiality on process weight rates. However, OAQ has determined that the control equipment shall be in operation at all times the facility is in operation in order to comply with this limit.

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to Construction Permit 157-1872, issued on August 10, 1990 and amended on November 1, 1991:

- (a) Particulate matter (PM) and PM-10 emissions from the Starch Flash Dryer #2, the Grinder Feed Collector, the Grinder Mill #1 and the Grinder Mill #2 shall not exceed a total of 11.3 tons per year. This shall be achieved by the following:
 - (1) PM and PM-10 emissions from the Starch Flash Dryer #2 shall not exceed 0.00374 grain per dry standard cubic foot (dscf). Also, the airflow rate shall not exceed 110,000 actual cubic feet per minute. At an average operating temperature of 105 degrees F or greater, these limits equate to a potential to emit 3.30 pounds per hour of PM and PM-10.
 - (2) PM and PM-10 emissions from Grinding Mill #1 shall not exceed 0.008 grain per dry standard cubic foot (dscf). Also, the airflow rate shall not exceed 2,900 actual cubic feet per minute. At an average operating temperature of 140 degrees F or greater, these limits equate to a potential to emit 0.22 pounds per hour of PM and PM-10.
 - (3) PM and PM-10 emissions from Grinding Mill #2 shall not exceed 0.008 grain per dry standard cubic foot (dscf). Also, the airflow rate shall not exceed 2,900 actual cubic feet per minute. At an average operating temperature of 140 degrees F or greater, these limits equate to a potential to emit 0.22 pounds per hour of PM and PM-10.
 - (4) On-stream time for the #2 Flash Dryer System shall be limited to 7354 hours of operation per 12-month period. "On-stream time" is the amount of time that the dryer starch feed conveyor and the Starch Flash Dryer #2 fan are both in operation. Both must be in operation in order to dry starch.
- (b) The following emission units shall remain inoperative unless new approval is obtained:
 - (1) The #2 Flash Dryer System's pneumatic product conveyor, which was replaced with a screw conveyor pursuant to Exemption 157-6014-00003, issued on July 9, 1996.

This condition, combined with conditions placed on the Bulk Railcar Loadout facility and Bins #20, 21 and 22, renders the requirements of PSD as not applicable for particulate matter and PM-10.

State Rule Applicability - Starch Storage System

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to Construction Permit 157-1872, issued on August 10, 1990 and amended on November 1, 1991, particulate matter and PM-10 emissions from Bins #20, 21 and #22 shall not exceed 0.1 tons per year. Only one of Bins #20, 21 and #22 shall be loaded at any time. This condition, combined with conditions placed on the Bulk Railcar Loadout facility and #2 Flash Dryer System, render the requirements of PSD as not applicable for particulate matter and PM-10.

State Rule Applicability - Bulk Railcar Loadout

326 IAC 6-3-2 (Particulate Emissions Limitations)

This facility is subject to 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations), particulate matter (PM) emissions shall be limited by the following equation for process weight rates up to sixty thousand (60,000) pounds per hour:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

An emission calculation does not appear in Appendix A due to claims of confidentiality on process weight rates. However, OAQ has determined that the control equipment shall be in operation at all times the facility is in operation in order to comply with this limit.

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to Construction Permit 157-1872, issued on August 10, 1990 and amended on November 1, 1991:

- (a) Particulate matter and PM-10 emissions from the Bulk Railcar Loadout facility shall not exceed 0.3 tons per year. This shall be achieved by the following:
 - (1) Particulate matter emissions from the facility shall not exceed 0.008 grain per dry standard cubic foot (dscf). Also, the airflow rate shall not exceed 2,200 actual cubic feet per minute. At an average operating temperature of 70 degrees F or greater, these limits equate to a potential to emit 0.15 pounds per hour of PM and PM-10.
 - (2) On-stream time for the facility shall be limited to 4380 hours of operation per 12-month period. "On-stream time" is the amount of time that the loadout blower is in operation.

This condition, combined with conditions placed on the Bulk Railcar Loadout facility and #2 Flash Dryer System, render the requirements of PSD as not applicable for particulate matter and PM-10.

Conclusion

The construction and operation of these facilities shall be subject to the conditions of the attached Significant Source Modification, No 157-14974-00003.

Appendix A: Emissions Calculations

Company Name: A. E. Staley Manufacturing Company
Address City IN Zip: 2245 North Sagamore Parkway, Lafayette, IN 47902
ID: 157-14974-00003
Reviewer: Allen R. Davidson
Date: 12/19/02

Previous Emission Levels:

| | | | | | | | | | |
|--|-----------------------|----------------------|----------------------------|--------------------------------------|----------------------|----------------------|--------------------|--|--------------|
| Starch Flash Dryer #2 | S/V #73 | | | | | | | | |
| 0.00374 grain * dscf | 100000 acf * min * | 528 deg. R (460 + | * (100 - 105) deg. R * | 0) % moisture * 100 % moisture * | 525600 min * year | 1 lb * 7000 grain | 1 ton = 2000 lb | | 13.12 ton/yr |
| Grinding Mill #1 | S/V #286 | | | | | | | | |
| 0.008 grain * dscf | 3600 acf * min * | 528 deg. R (460 + | * (100 - 140) deg. R * | 0) % moisture * 100 % moisture * | 525600 min * year | 1 lb * 7000 grain | 1 ton = 2000 lb | | 0.95 ton/yr |
| Grinding Mill #2 | S/V #287 | | | | | | | | |
| 0.008 grain * dscf | 3600 acf * min * | 528 deg. R (460 + | * (100 - 140) deg. R * | 0) % moisture * 100 % moisture * | 525600 min * year | 1 lb * 7000 grain | 1 ton = 2000 lb | | 0.95 ton/yr |
| Grinder Feed Collector | S/V #288 | | | | | | | | |
| 0.008 grain * dscf | 1700 acf * min * | 528 deg. R (460 + | * (100 - 70) deg. R * | 0) % moisture * 100 % moisture * | 525600 min * year | 1 lb * 7000 grain | 1 ton = 2000 lb | | 0.51 ton/yr |
| Starch Slurry Tanks | | | | | | | | | |
| no PM emission | | | | | | | | | 0 ton/yr |
| Starch Slurry Dewatering Process Equipment | | | | | | | | | |
| no PM emission | | | | | | | | | 0 ton/yr |
| <hr/> | | | | | | | | | |
| Total for Flash Dryer System #2: | | | | | | | | | 15.53 ton/yr |

Starch Product Bin #20 S/V #76

| | | | | | | | | |
|-----------------------|---------------------|----------------------|----------------------------|----------------------------|----------------------|----------------------|--------------------|-------------|
| 0.008 grain * dscf | 2900 acf * min * | 528 deg. R (460 + | * (100% - 80) deg. R * | 0 % moisture) * 100 % * | 525600 min * year | 1 lb * 7000 grain | 1 ton = 2000 lb | 0.85 ton/yr |
|-----------------------|---------------------|----------------------|----------------------------|----------------------------|----------------------|----------------------|--------------------|-------------|

Starch Product Bin #21 S/V #77

Only one of Bins #20, #21 or #22 can operate at the same time.

Starch Product Bin #22 S/V #78

Only one of Bins #20, #21 or #22 can operate at the same time.

Starch Product Bin #33 S/V #267

| | | | | | | | | |
|-----------------------|---------------------|----------------------|---------------------------|--------------------------------------|----------------------|----------------------|--------------------|-------------|
| 0.008 grain * dscf | 2900 acf * min * | 528 deg. R (460 + | * (100 - 80) deg. R * | 0) % moisture * 100 % moisture * | 525600 min * year | 1 lb * 7000 grain | 1 ton = 2000 lb | 0.85 ton/yr |
|-----------------------|---------------------|----------------------|---------------------------|--------------------------------------|----------------------|----------------------|--------------------|-------------|

Starch Product Bin #34 S/V #268

| | | | | | | | | |
|-----------------------|---------------------|----------------------|---------------------------|--------------------------------------|----------------------|----------------------|--------------------|-------------|
| 0.008 grain * dscf | 2900 acf * min * | 528 deg. R (460 + | * (100 - 70) deg. R * | 0) % moisture * 100 % moisture * | 525600 min * year | 1 lb * 7000 grain | 1 ton = 2000 lb | 0.87 ton/yr |
|-----------------------|---------------------|----------------------|---------------------------|--------------------------------------|----------------------|----------------------|--------------------|-------------|

Starch Product Bin #35 S/V #269

| | | | | | | | | |
|-----------------------|---------------------|----------------------|---------------------------|--------------------------------------|----------------------|----------------------|--------------------|-------------|
| 0.008 grain * dscf | 2900 acf * min * | 528 deg. R (460 + | * (100 - 70) deg. R * | 0) % moisture * 100 % moisture * | 525600 min * year | 1 lb * 7000 grain | 1 ton = 2000 lb | 0.87 ton/yr |
|-----------------------|---------------------|----------------------|---------------------------|--------------------------------------|----------------------|----------------------|--------------------|-------------|

Starch Transfer Bin #91 S/V #345

| | | | | | | | | |
|-----------------------|---------------------|----------------------|---------------------------|--------------------------------------|----------------------|----------------------|--------------------|-------------|
| 0.008 grain * dscf | 2900 acf * min * | 528 deg. R (460 + | * (100 - 70) deg. R * | 0) % moisture * 100 % moisture * | 525600 min * year | 1 lb * 7000 grain | 1 ton = 2000 lb | 0.87 ton/yr |
|-----------------------|---------------------|----------------------|---------------------------|--------------------------------------|----------------------|----------------------|--------------------|-------------|

Starch Transfer Bin #92 S/V #346

| | | | | | | | | |
|-----------------------|---------------------|----------------------|---------------------------|--------------------------------------|----------------------|----------------------|--------------------|-------------|
| 0.008 grain * dscf | 2900 acf * min * | 528 deg. R (460 + | * (100 - 70) deg. R * | 0) % moisture * 100 % moisture * | 525600 min * year | 1 lb * 7000 grain | 1 ton = 2000 lb | 0.87 ton/yr |
|-----------------------|---------------------|----------------------|---------------------------|--------------------------------------|----------------------|----------------------|--------------------|-------------|

Total for Storage and Transfer: 5.17 ton/yr

| | | | | | | | | |
|-----------------------|---------------------|----------------------|---------------------------|--------------------------------------|----------------------|----------------------|--------------------|-------------|
| 0.008 grain * dscf | 2200 acf * min * | 528 deg. R (460 + | * (100 - 70) deg. R * | 0) % moisture * 100 % moisture * | 525600 min * year | 1 lb * 7000 grain | 1 ton = 2000 lb | 0.66 ton/yr |
|-----------------------|---------------------|----------------------|---------------------------|--------------------------------------|----------------------|----------------------|--------------------|-------------|

Total for Bulk Railcar Loading: 0.66 ton/yr

Total for Facilities in Permit: 21.37 ton/yr

Appendix A: Emissions Calculations

Company Name: A. E. Staley Manufacturing Company
Address City IN Zip: 2245 North Sagamore Parkway, Lafayette, IN 47902
ID: 157-14974-00003
Reviewer: Allen R. Davidson
Date: 12/19/02

Proposed Emissions Before Limits:

| | | | | | | | | | |
|--|-----------------------|----------------------|----------------------------|--------------------------------------|----------------------|----------------------|--------------------|--------------|--------------------|
| Starch Flash Dryer #2 | S/V #73 | | | | | | | | |
| 0.00374 grain * dscf | 110000 acf * min * | 528 deg. R (460 + | * (100 - 105) deg. R * | 0) % moisture * 100 % moisture * | 525600 min * year | 1 lb * 7000 grain | 1 ton = 2000 lb | 14.43 ton/yr | (3.295361 lb/hr) |
| Grinding Mill #1 | S/V #286 | | | | | | | | |
| 0.008 grain * dscf | 3600 acf * min * | 528 deg. R (460 + | * (100 - 140) deg. R * | 0) % moisture * 100 % moisture * | 525600 min * year | 1 lb * 7000 grain | 1 ton = 2000 lb | 0.95 ton/yr | (0.217234 lb/hr) |
| Grinding Mill #2 | S/V #287 | | | | | | | | |
| 0.008 grain * dscf | 3600 acf * min * | 528 deg. R (460 + | * (100 - 140) deg. R * | 0) % moisture * 100 % moisture * | 525600 min * year | 1 lb * 7000 grain | 1 ton = 2000 lb | 0.95 ton/yr | (0.217234 lb/hr) |
| Grinder Feed Collector | S/V #288 | | | | | | | | |
| vented to other process | | | | | | | | | |
| Starch Slurry Tanks | | | | | | | | | |
| no PM emission | | | | | | | | 0 ton/yr | |
| Starch Slurry Dewatering Process Equipment | | | | | | | | | |
| no PM emission | | | | | | | | 0 ton/yr | |
| <hr/> Total for Flash Dryer System #2: | | | | | | | | 16.34 ton/yr | |

Starch Product Bin #20 S/V #76

$$\frac{0.008 \text{ grain}^* \quad 2100 \text{ acf}^* \quad 528 \text{ deg. R}^* \quad (100\% - 0\% \text{ moisture})^* \quad 525600 \text{ min}^* \quad 1 \text{ lb}^* \quad 1 \text{ ton} =}{\text{dscf} \quad \text{min}^* \quad (460 + 80) \text{ deg. R}^* \quad 100\% \text{ moisture}^* \quad \text{year} \quad 7000 \text{ grain} \quad 2000 \text{ lb}} \quad 0.62 \text{ ton/yr}$$

Starch Product Bin #21 S/V #77

Only one of Bins #20, #21 or #22 can operate at the same time.

Starch Product Bin #22 S/V #78

Only one of Bins #20, #21 or #22 can operate at the same time.

Starch Product Bin #23 S/V #267

$$\frac{0.008 \text{ grain}^* \quad 2100 \text{ acf}^* \quad 528 \text{ deg. R}^* \quad (100 - 0) \% \text{ moisture}^* \quad 525600 \text{ min}^* \quad 1 \text{ lb}^* \quad 1 \text{ ton} =}{\text{dscf} \quad \text{min}^* \quad (460 + 80) \text{ deg. R}^* \quad 100 \% \text{ moisture}^* \quad \text{year} \quad 7000 \text{ grain} \quad 2000 \text{ lb}} \quad 0.62 \text{ ton/yr}$$

Starch Product Bin #34 S/V #268

$$\frac{0.008 \text{ grain}^* \quad 2900 \text{ acf}^* \quad 528 \text{ deg. R}^* \quad (100 - 0) \% \text{ moisture}^* \quad 525600 \text{ min}^* \quad 1 \text{ lb}^* \quad 1 \text{ ton} =}{\text{dscf} \quad \text{min}^* \quad (460 + 70) \text{ deg. R}^* \quad 100 \% \text{ moisture}^* \quad \text{year} \quad 7000 \text{ grain} \quad 2000 \text{ lb}} \quad 0.87 \text{ ton/yr}$$

Starch Product Bin #35 S/V #269

$$\frac{0.008 \text{ grain}^* \quad 2900 \text{ acf}^* \quad 528 \text{ deg. R}^* \quad (100 - 0) \% \text{ moisture}^* \quad 525600 \text{ min}^* \quad 1 \text{ lb}^* \quad 1 \text{ ton} =}{\text{dscf} \quad \text{min}^* \quad (460 + 70) \text{ deg. R}^* \quad 100 \% \text{ moisture}^* \quad \text{year} \quad 7000 \text{ grain} \quad 2000 \text{ lb}} \quad 0.87 \text{ ton/yr}$$

Starch Transfer Bin #91 S/V #345

$$\frac{0.008 \text{ grain}^* \quad 2900 \text{ acf}^* \quad 528 \text{ deg. R}^* \quad (100 - 0) \% \text{ moisture}^* \quad 525600 \text{ min}^* \quad 1 \text{ lb}^* \quad 1 \text{ ton} =}{\text{dscf} \quad \text{min}^* \quad (460 + 70) \text{ deg. R}^* \quad 100 \% \text{ moisture}^* \quad \text{year} \quad 7000 \text{ grain} \quad 2000 \text{ lb}} \quad 0.87 \text{ ton/yr}$$

Starch Transfer Bin #92 S/V #346

$$\frac{0.008 \text{ grain}^* \quad 2900 \text{ acf}^* \quad 528 \text{ deg. R}^* \quad (100 - 0) \% \text{ moisture}^* \quad 525600 \text{ min}^* \quad 1 \text{ lb}^* \quad 1 \text{ ton} =}{\text{dscf} \quad \text{min}^* \quad (460 + 70) \text{ deg. R}^* \quad 100 \% \text{ moisture}^* \quad \text{year} \quad 7000 \text{ grain} \quad 2000 \text{ lb}} \quad 0.87 \text{ ton/yr}$$

Total for Storage and Transfer: 4.70 ton/yr

Bulk Railcar Loading:

$$\frac{0.008 \text{ grain}^* \quad 2200 \text{ acf}^* \quad 528 \text{ deg. R}^* \quad (100 - 0) \% \text{ moisture}^* \quad 525600 \text{ min}^* \quad 1 \text{ lb}^* \quad 1 \text{ ton} =}{\text{dscf} \quad \text{min}^* \quad (460 + 70) \text{ deg. R}^* \quad 100 \% \text{ moisture}^* \quad \text{year} \quad 7000 \text{ grain} \quad 2000 \text{ lb}} \quad 0.66 \text{ ton/yr} \quad (0.150288 \text{ lb/hr})$$

Total for Bulk Railcar Loading: 0.66 ton/yr

Total for Facilities in Permit: 21.70 ton/yr

Appendix A: Emissions Calculations

Company Name: A. E. Staley Manufacturing Company
Address City IN Zip: 2245 North Sagamore Parkway, Lafayette, IN 47902
ID: 157-14974-00003
Reviewer: Allen R. Davidson
Date: 12/19/02

Proposed Emissions After Limits:

| | | | | |
|--|-------------------------|--|---|----------------|
| Starch Flash Dryer #2 | S/V #73 | | | |
| | | $\frac{14.43 \text{ ton /yr} *}{8760 \text{ hr / yr}}$ | $\frac{7534 \text{ hr / yr}}{8760 \text{ hr / yr}}$ | = 12.41 ton/yr |
| Grinding Mill #1 | S/V #286 | | | |
| | | $\frac{0.95 \text{ ton /yr} *}{8760 \text{ hr / yr}}$ | $\frac{7534 \text{ hr / yr}}{8760 \text{ hr / yr}}$ | = 0.82 ton/yr |
| Grinding Mill #2 | S/V #287 | | | |
| | | $\frac{0.95 \text{ ton /yr} *}{8760 \text{ hr / yr}}$ | $\frac{7534 \text{ hr / yr}}{8760 \text{ hr / yr}}$ | = 0.82 ton/yr |
| Grinder Feed Collector | S/V #288 | | | |
| | vented to other process | | | |
| Starch Slurry Tanks | | | | |
| | no PM emission | | | 0 ton/yr |
| Starch Slurry Dewatering Process Equipment | | | | |
| | no PM emission | | | 0 ton/yr |
| <hr/> | | | | |
| Total for Flash Dryer System #2: | | | | 14.05 ton/yr |

Starch Product Bin #20 S/V #76

$$\frac{0.62 \text{ ton /yr} *}{8760 \text{ hr / yr}} = \frac{7534 \text{ hr / yr}}{8760 \text{ hr / yr}} = 0.53 \text{ ton/yr}$$

Starch Product Bin #21 S/V #77

Only one of Bins #20, #21 or #22 can operate at the same time.

Starch Product Bin #22 S/V #78

Only one of Bins #20, #21 or #22 can operate at the same time.

Starch Product Bin #23 S/V #267

$$\frac{0.008 \text{ grain} *}{\text{dscf}} \frac{2100 \text{ acf} *}{\text{min} *} \frac{528 \text{ deg. R}}{(460 + 80) \text{ deg. R} *} * (100 - 0) \% \text{ moisture} * \frac{525600 \text{ min} *}{\text{year}} \frac{1 \text{ lb} *}{7000 \text{ grain}} \frac{1 \text{ ton} =}{2000 \text{ lb}} = 0.62 \text{ ton/yr}$$

Starch Product Bin #34 S/V #268

$$\frac{0.008 \text{ grain} *}{\text{dscf}} \frac{2900 \text{ acf} *}{\text{min} *} \frac{528 \text{ deg. R}}{(460 + 70) \text{ deg. R} *} * (100 - 0) \% \text{ moisture} * \frac{525600 \text{ min} *}{\text{year}} \frac{1 \text{ lb} *}{7000 \text{ grain}} \frac{1 \text{ ton} =}{2000 \text{ lb}} = 0.87 \text{ ton/yr}$$

Starch Product Bin #35 S/V #269

$$\frac{0.008 \text{ grain} *}{\text{dscf}} \frac{2900 \text{ acf} *}{\text{min} *} \frac{528 \text{ deg. R}}{(460 + 70) \text{ deg. R} *} * (100 - 0) \% \text{ moisture} * \frac{525600 \text{ min} *}{\text{year}} \frac{1 \text{ lb} *}{7000 \text{ grain}} \frac{1 \text{ ton} =}{2000 \text{ lb}} = 0.87 \text{ ton/yr}$$

Starch Transfer Bin #91 S/V #345

$$\frac{0.008 \text{ grain} *}{\text{dscf}} \frac{2900 \text{ acf} *}{\text{min} *} \frac{528 \text{ deg. R}}{(460 + 70) \text{ deg. R} *} * (100 - 0) \% \text{ moisture} * \frac{525600 \text{ min} *}{\text{year}} \frac{1 \text{ lb} *}{7000 \text{ grain}} \frac{1 \text{ ton} =}{2000 \text{ lb}} = 0.87 \text{ ton/yr}$$

Starch Transfer Bin #92 S/V #346

$$\frac{0.008 \text{ grain} *}{\text{dscf}} \frac{2900 \text{ acf} *}{\text{min} *} \frac{528 \text{ deg. R}}{(460 + 70) \text{ deg. R} *} * (100 - 0) \% \text{ moisture} * \frac{525600 \text{ min} *}{\text{year}} \frac{1 \text{ lb} *}{7000 \text{ grain}} \frac{1 \text{ ton} =}{2000 \text{ lb}} = 0.87 \text{ ton/yr}$$

Total for Storage and Transfer: 4.62 ton/yr

Bulk Railcar Loading:

$$\frac{0.66 \text{ ton /yr} *}{8760 \text{ hr / yr}} = \frac{4380 \text{ hr / yr}}{8760 \text{ hr / yr}} = 0.33 \text{ ton/yr}$$

Total for Bulk Railcar Loading: 0.33 ton/yr

Total for Facilities in Permit: 19.00 ton/yr

Appendix A: Emissions Calculations

Company Name: A. E. Staley Manufacturing Company
Address City IN Zip: 2245 North Sagamore Parkway, Lafayette, IN 47902
ID: 157-14974-00003
Reviewer: Allen R. Davidson
Date: 12/19/02

Proposed Emissions for Facilities Limited by CP 157-1872:

| | | | | | |
|--|----------|-------------------------|--|---|--------------|
| Starch Flash Dryer #2 | S/N #73 | | | | |
| | | | $\frac{14.43 \text{ ton /yr} *}{8760 \text{ hr / yr}}$ | $\frac{7534 \text{ hr / yr}}{8760 \text{ hr / yr}}$ | = |
| | | | | | 12.41 ton/yr |
| Grinding Mill #1 | S/N #286 | | | | |
| | | | $\frac{0.95 \text{ ton /yr} *}{8760 \text{ hr / yr}}$ | $\frac{7534 \text{ hr / yr}}{8760 \text{ hr / yr}}$ | = |
| | | | | | 0.82 ton/yr |
| Grinding Mill #2 | S/N #287 | | | | |
| | | | $\frac{0.95 \text{ ton /yr} *}{8760 \text{ hr / yr}}$ | $\frac{7534 \text{ hr / yr}}{8760 \text{ hr / yr}}$ | = |
| | | | | | 0.82 ton/yr |
| Grinder Feed Collector | S/N #288 | | | | |
| | | vented to other process | | | |
| Starch Slurry Tanks | | | | | |
| | | no PM emission | | | |
| | | | | | 0.00 ton/yr |
| Starch Slurry Dewatering Process Equipment | | | | | |
| | | no PM emission | | | |
| | | | | | 0.00 ton/yr |
| <hr/> | | | | | |
| Total for Flash Dryer System #2: | | | | | |
| | | | | | 14.05 ton/yr |

Starch Product Bin #20 S/N #76

$$\frac{0.62 \text{ ton /yr} *}{8760 \text{ hr / yr}} = \frac{7534 \text{ hr / yr}}{8760 \text{ hr / yr}} = 0.53 \text{ ton/yr}$$

Starch Product Bin #21 S/N #77

Only one of Bins #20, #21 or #22 can operate at the same time.

Starch Product Bin #22 S/N #78

Only one of Bins #20, #21 or #22 can operate at the same time.

Bulk Railcar Loading:

$$\frac{0.66 \text{ ton /yr} *}{8760 \text{ hr / yr}} = \frac{4380 \text{ hr / yr}}{8760 \text{ hr / yr}} = 0.33 \text{ ton/yr}$$

Total for Bulk Railcar Loading: 0.33 ton/yr

Total for Facilities in Permit: 14.91 ton/yr