INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

November 17, 2004

TO: Interested Parties / Applicant

RE: Azteca Milling, L.P. / SPM 163-18652-00107

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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNTV-PMOD.doc 9/16/03

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Mr. Angel Tamez
Azteca Milling L.P.
15700 Highway 41 North
Evansville, IN 47711

November 17, 2004

Re: 163-18652
Significant Permit Modification to
Part 70 Permit No.: 163-7995-00107

Dear Mr. Tamez:

Azteca Milling, L.P. was issued a Part 70 Permit on February 28, 2001, for the operation of a stationary wet corn-milling source. An application to modify the source was received by the Office of Air Quality (OAQ) on February 12, 2004. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

This modification relates to the installation of the following emission units:

(a) two (2) natural gas-fired steam boilers, identified as, Unit 3 Boiler and Unit 4 Boiler, each rated at 10.46 million (MM) British thermal units (Btu) per hour, each exhausting through separate stacks (ID Stacks 207 and 307), respectively;

(b) three (3) corn receiving pits with hoods, identified as Corn Receiving Pit A, B, and D, each with a maximum capacity of 203 metric tons per hour, each with a baghouse (ID 1, 101, and 51), exhausting through stacks (ID Stacks 1, 101 and 206), each equipped with a grain scalper (A, B, & D) to remove foreign material from the corn, each scalper with a baghouse (ID 2, 102, and 52) for particulate matter control, each exhausting through its own stack (ID Stacks 2, 102 and 52);

(c) one (1) Grain receiving pit scalper C, associated with existing Grain receiving Pit C, with a baghouse (ID 106) for particulate matter control, exhausting through one (1) stack (ID Stack 106);

(d) one (1) lime bin system, with a maximum throughput capacity of 22.5 metric tons per hour, using a baghouse (ID Baghouse) for particulate matter control, exhausting through one (1) stack (ID Stack 209);

(e) one (1) drying line, identified as C103, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as “Unit 3, Drying First Circuit Cyclone”, for particulate matter control, and a heat recovery system and wet scrubber for recovering residual heat, exhausting through one (1) stack (ID Stack 210);

(f) one (1) drying line, identified as C104, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as “Unit 4, Drying First Circuit Cyclone”, for particulate matter control, and a heat recovery system and wet scrubber for recovering residual heat, exhausting through one (1) stack (ID Stack 310);

(g) one (1) drying line, identified as C203, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour, with a cyclone, identified as “Unit 3, Drying Second Circuit Cyclone”, for particulate matter control, exhausting through one (1) stack (ID Stack 211);

(h) one (1) drying line, identified as C204, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour, with a cyclone, identified as “Unit 4, Drying Second Circuit Cyclone”, for particulate matter control, exhausting through one (1) stack (ID Stack 311);

(i) one (1) flour cooler, identified as FC3, with a maximum capacity of 9.32 metric tons per hour, with a cyclone, identified as “Flour Cooler Cyclone”, for particulate matter control, exhausting through one (1) stack (ID Stack 212);

(j) one (1) flour cooler, identified as FC4, with a maximum capacity of 9.32 metric tons per hour, with a cyclone, identified as “Flour Cooler Cyclone”, for particulate matter control, exhausting through one (1) stack (ID Stack 312);

(k) one (1) flour sifter system, identified as FS3, with a maximum capacity of 9.32 metric tons per hour, with three (3) separate steps, each using a baghouse for particulate matter control, exhausting through three (3) stacks (ID Stack 254, 255, & 256);

(l) one (1) flour sifter system, identified as FS4, with a maximum capacity of 9.32 metric tons per hour, with three (3) separate steps, each using a baghouse for particulate matter control, exhausting through three (3) stacks (ID Stack 354, 355, & 356);

(m) one (1) milled and dried flour unit, identified as MDF3, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B) for particulate matter control, exhausting through one (1) stack (ID Stack 214);

(n) one (1) milled and dried flour unit, identified as MDF4, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B) for particulate matter control, exhausting through one (1) stack (ID Stack 314);

(o) one (1) pair of corn skin separators, identified as CSS3N and CSS3S, each with a maximum capacity of 0.647 ton per hour, each using a baghouse (IDs BN and BS respectively) for particulate matter control, exhausting through one stack (IDs Stack 240N and 240S respectively);

(p) one (1) pair of corn skin separators, identified as CSS4N and CSS4S, each with a maximum capacity of 0.323 ton per hour, each using a baghouse (ID BN and BS, respectively) for particulate matter control, each exhausting through one (1) stack (ID Stacks 340N and 340S, respectively); and

(q) six (6) natural gas fired grain dryers, identified as GD-1, GD-2, GD-3, GD-4, GD-5 and GD-6, each with a maximum heat input rate of 16.80 mm Btu per hour, each exhausting through separate stacks (ID Stacks 5, 4, 3, 105, 104 and 103), respectively.

(r) two (2) rework mill cooling fans, each exhausting through separate stacks (ID Stacks 253 and 353), respectively.

The changes made in the Part 70 Operating Permit are presented in the attached Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Seema Roy, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 973-575-2555, extension 3419, or in Indiana at 1-800-451-6027.

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SR / EVP

cc: File – Vanderburgh County
Vanderburgh County Health Department
Northern Regional Office
Air Compliance Section Inspector – Scott Anslinger
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Azteca Milling, L.P.
15700 Highway 41 North
Evansville, Indiana 47711

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.

Operation Permit No.: T163-7995-00107	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: February 28, 2001 Expiration Date: January 26, 2006

First Administrative Amendment 163-16010-00107; issued on September 20, 2002;
First Significant Permit Modification 163-15980-00107, issued on October 22, 2002;
Second Administrative Amendment 163-17718-00107, issued on September 8, 2003.

2nd Significant Permit Modification No.: 163-18652-00107	Pages Modified: 2 - 6, 6a, 6b, 7, 25-26, 28 - 30, 30a, 31 - 36, and 36a
Issued by: Original signed by Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: November 17, 2004

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary wet corn milling operation producing corn flour at a maximum rate of 320,000 metric tons per year.

Responsible Official:	Vice President
Source Address:	15700 Highway 41 North, Evansville, Indiana 47711
Mailing Address:	P.O. Box 23550, Evansville, Indiana 47724
SIC Code:	2046
County Location:	Vanderburgh
Source Location Status:	Nonattainment for ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules, and Nonattainment NSR;

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

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

(a) two (2) natural gas-fired steam boilers, identified as Unit 1 Boiler and Unit 2 Boiler, constructed in 1995 and 1996 respectively, each rated at 10.46 million (MM) British thermal units (Btu) per hour, each exhausting through one (1) stack (ID Stacks 7 and 107), respectively;

(b) two (2) natural gas-fired steam boilers, identified as, Unit 3 Boiler and Unit 4 Boiler, each rated at 10.46 million (MM) British thermal units (Btu) per hour, each exhausting through separate stacks (ID Stacks 207 and 307), respectively;

(c) one (1) corn receiving pit, identified as Corn Receiving Pit C, constructed in 1995, exhausting through stack (ID Stack 1), located in an enclosed building, with a maximum capacity of 203 metric tons per hour, equipped with a grain scalper to remove foreign material from the corn, with a baghouse (ID B1) for particulate matter control, exhausting through one (1) stack (ID Stack 51);

(d) three (3) corn receiving pits with hoods , identified as Corn Receiving Pit A, B, and D, each with a maximum capacity of 203 metric tons per hour, each with a baghouse (ID 1, 101, and 51), exhausting through stacks (ID Stacks 1, 101 and 206), each equipped with a grain scalper (A, B, & D) to remove foreign material from the corn, each scalper with a baghouse (ID 2, 102, and 52) for particulate matter control, each exhausting through its own stack (ID Stacks 2, 102 and 52);

(e) one (1) Grain receiving pit scalper C, associated with existing Grain receiving Pit C, with a baghouse (ID 106) for particulate matter control, exhausting through one (1) stack (ID Stack 106);

(f) two (2) corn screeners, identified as Unit 1 Screener and Unit 2 Screener, constructed in 1995 and 1996 respectively, one with a maximum capacity of 30 metric tons per hour and the other one with a maximum capacity of 100 metric tons per hour, with a baghouse (ID B1) for particulate matter control, exhausting through one (1) stack (ID Stack 6);

(g) one (1) lime bin system, constructed in 1995, with a maximum throughput capacity of 22.5 metric tons per hour, using a baghouse (ID B2) for particulate matter control, exhausting through one (1) stack (ID Stack 9);

(h) one (1) lime bin system, with a maximum throughput capacity of 22.5 metric tons per hour, using a baghouse (ID Baghouse) for particulate matter control, exhausting through one (1) stack (ID Stack 209);

(i) one (1) drying line, identified as C101, constructed in 1995, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as “Unit 1, Drying First Circuit Cyclone”, for particulate matter control, and a heat recovery system and wet scrubber for recovering residual heat, exhausting through one (1) stack (ID Stack 10);

(j) one (1) drying line, identified as C102, constructed in 1996, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as “Unit 2, Drying First Circuit Cyclone”, for particulate matter control, and a heat recovery system and wet scrubber for recovering residual heat, exhausting through one (1) stack (ID Stack 110);

(k) one (1) drying line, identified as C201, constructed in 1995, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour, with a cyclone, identified as “Unit 1, Drying Second Circuit Cyclone”, for particulate matter control, exhausting through one (1) stack (ID Stack 11);

(l) one (1) drying line, identified as C202, constructed in 1996, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour, with a cyclone, identified as “Unit 2, Drying Second Circuit Cyclone”, for particulate matter control, exhausting through one (1) stack (ID Stack 111);

(m) one (1) drying line, identified as C103, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as “Unit 3, Drying First Circuit Cyclone”, for particulate matter control, and a heat recovery system and wet scrubber for recovering residual heat, exhausting through one (1) stack (ID Stack 210);

(n) one (1) drying line, identified as C104, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as “Unit 4, Drying First Circuit Cyclone”, for particulate matter control, and a heat recovery system and wet scrubber for recovering residual heat, exhausting through one (1) stack (ID Stack 310);

(o) one (1) drying line, identified as C203, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour, with a cyclone, identified as “Unit 3, Drying Second Circuit Cyclone”, for particulate matter control, exhausting through one (1) stack (ID Stack 211);

(p) one (1) drying line, identified as C204, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour, with a cyclone, identified as “Unit 4, Drying Second Circuit Cyclone”, for particulate matter control, exhausting through one (1) stack (ID Stack 311);

(q) one (1) flour cooler, identified as FC1, constructed in 1995, with a maximum capacity of 9.32 metric tons per hour, with a cyclone, identified as “Flour Cooler Cyclone”, for particulate matter control, exhausting through one (1) stack (ID Stack 12);

(r) one (1) flour cooler, identified as FC2, constructed 1996, with a maximum capacity of 9.32 metric tons per hour, with a cyclone, identified as “Flour Cooler Cyclone”, for particulate matter control, exhausting through one (1) stack (ID Stack 112);

(s) one (1) flour cooler, identified as FC3, with a maximum capacity of 9.32 metric tons per hour, with a cyclone, identified as “Flour Cooler Cyclone”, for particulate matter control, exhausting through one (1) stack (ID Stack 212);

(t) one (1) flour cooler, identified as FC4, with a maximum capacity of 9.32 metric tons per hour, with a cyclone, identified as “Flour Cooler Cyclone”, for particulate matter control, exhausting through one (1) stack (ID Stack 312);

(u) one (1) flour sifter system, identified as FS1, constructed in 1995, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B3) for particulate matter control, exhausting through one (1) stack (ID Stack 13);

(v) one (1) flour sifter system, identified as FS2, constructed in 1996, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B4) for particulate matter control, exhausting through one (1) stack (ID Stack 113);

(w) one (1) flour sifter system, identified as FS3, with a maximum capacity of 9.32 metric tons per hour, with three (3) separate steps, each using a baghouse for particulate matter control, exhausting through three (3) stacks (ID Stack 254, 255, & 256);

(x) one (1) flour sifter system, identified as FS4, with a maximum capacity of 9.32 metric tons per hour, with three (3) separate steps, each using a baghouse for particulate matter control, exhausting through three (3) stacks (ID Stack 354, 355, & 356);

(y) one (1) milled and dried flour unit, identified as MDF1, constructed in 1995, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B5) for particulate matter control, exhausting through one (1) stack (ID Stack 14);

(z) one (1) milled and dried flour unit, identified as MDF2, constructed in 1996, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B6) for particulate matter control, exhausting through one (1) stack (ID Stack 114);

(aa) one (1) milled and dried flour unit, identified as MDF3, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B) for particulate matter control, exhausting through one (1) stack (ID Stack 214);

(bb) one (1) milled and dried flour unit, identified as MDF4, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B) for particulate matter control, exhausting through one (1) stack (ID Stack 314);

(cc) one (1) corn skin separator, identified as CSS1, constructed in 1995, with a maximum capacity of 0.647 ton per hour, using a baghouse (ID B8) for particulate matter control, exhausting through one (1) stack (ID Stack 40);

(dd) one (1) pair of corn skin separators, identified as CSS2N and CSS2S, constructed in 1996, each with a maximum capacity of 0.323 ton per hour, each using a baghouse (ID B9N and B9S, respectively) for particulate matter control, each exhausting through one (1) stack (ID Stacks 140N and 140S, respectively);

(ee) one (1) pair of corn skin separators, identified as CSS3N and CSS3S, each with a maximum capacity of 0.647 ton per hour, each using a baghouse (IDs BN and BS respectively) for particulate matter control, exhausting through one stack (IDs Stack 240N and 240S respectively);

(ff) one (1) pair of corn skin separators, identified as CSS4N and CSS4S, each with a maximum capacity of 0.323 ton per hour, each using a baghouse (ID BN and BS, respectively) for particulate matter control, each exhausting through one (1) stack (ID Stacks 340N and 340S, respectively).

(gg) one (1) corn skin storage system, constructed in 1995, with a maximum capacity of 1.294 metric tons per hour, using a baghouse (ID B9) for PM control, exhausting through one (1) stack (ID Stack 15);

(hh) one (1) rail loading system, constructed in 1995, with a maximum capacity of 21.77 metric tons per hour, with a three way valve leading to three flexible lines, using a pneumatic filtering device (ID B10) for particulate matter control, exhausting indoors (ID Stack 49);

(ii) one (1) truck loading system, constructed in 2002, sharing a pneumatic filtering device with the rail loading system for particulate matter control, exhausting indoors; and

(jj) six (6) natural gas fired grain dryers, identified as GD-1, GD-2, GD-3, GD-4, GD-5 and GD-6, each with a maximum heat input rate of 16.80 mm Btu per hour.

(kk) two (2) rework mill cooling fans, each exhausting through separate stacks (ID Stacks 253 and 353), respectively.

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

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

(a) Other categories with PM emissions below insignificant thresholds:

(1) twenty-four (24) flour storage bins, each with one (1) baghouse for PM emissions control, each exhausting through one stack (ID Stacks 16 through 39). [326 IAC 6-1-2]

(2) twenty-four (24) flour storage bins, each with one (1) baghouse for PM, each exhausting through one stack (ID Stacks 55 through 78); [326 IAC 6-1-2]

(3) a pneumatic conveying system for collection of flour from storage bins, with six (6) baghouses for PM emissions control, exhausting through six (6) stacks (ID Stacks 43 through 48), respectively . [326 IAC 6-1-2]

(4) a pneumatic conveying system for collection of flour from storage bins, with two (2) baghouses for PM emissions control, exhausting through two (2) stacks (ID Stacks 251 and 252); [326 IAC 6-1-2]

(5) two (2) rework bins, each with one (1) baghouse for PM emissions control, each exhausting through one (1) stack (ID Stacks 41 and 42). [326 IAC 6-1-2]

(6) two (2) rework bins, each with one (1) baghouse for PM emissions control, each exhausting through one (1) stack (ID Stacks 241 and 242); [326 IAC 6-1-2]

(7) one (1) ingredients hopper, with one (1) baghouse for PM emissions control exhausting through one (1) stack (ID Stack 53). [326 IAC 6-1-2]

(8) two (2) packaging machines, with one (1) baghouse for PM emissions control, exhausting through one (1) stack (ID Stack 50). [326 IAC 6-1-2]

(9) two (2) packaging machines, with two (2) baghouses for PM emissions control, exhausting through two (2) stacks (ID Stacks 253 and 353) respectively. [326 IAC 6-1-2]

(10) sack dumping, exhausting indoors through one (1) stack (ID Stack 54). [326 IAC 6-1-2]

(11) two (2) lime hoppers, each with a maximum throughput capacity of 8.3 metric tons per hour, each exhausting through one (1) stack (ID Stacks 8 and 108). [326 IAC 6-1-2]

(12) two (2) lime hoppers, each with a maximum throughput capacity of 8.3 metric tons per hour, each exhausting through one (1) stack (ID Stacks 208 and 308); [326 IAC 6-1-2]

(13) one (1) 6.0 million Btu per hour natural gas fired wet cake dryer, with an airflow rate of 4226 dry standard cubic feet per minute (dscf/min), exhausting through stack (ID Stack 80); [326 IAC 6-1-2]

(14) one (1) 6.0 million Btu per hour natural gas fired wet cake dryer, with an airflow rate of 4226 dry standard cubic feet per minute (dscf/min)), exhausting through stack (ID Stack 180). [326 IAC 6-1-2]

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps 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.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, 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 in response to 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.17 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) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The 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

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

(b) 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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports 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 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 ninety (90) days of permit issuance.

C.19 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.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) two (2) natural gas-fired steam boilers, identified as Unit 1 Boiler and Unit 2 Boiler, constructed in 1995 and 1996 respectively, each rated at 10.46 million (MM) British thermal units (Btu) per hour, each exhausting through one (1) stack (ID Stacks 7 and 107), respectively;

(b) two (2) natural gas-fired steam boilers, identified as, Unit 3 Boiler and Unit 4 Boiler, each rated at 10.46 million (MM) British thermal units (Btu) per hour, each exhausting through separate stacks (ID Stacks 207 and 307), respectively;

(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.1.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(b), particulate matter emissions from each of the four (4) boilers (ID Unit 1 Boiler, Unit 2 Boiler, Unit 3 Boiler and Unit 4 Boiler) shall be limited to no greater than 0.01 gr/dscf.

D.1.2 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

(a) Pursuant to 326 IAC 6-2-4 (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)), particulate emissions from each of the two (2) boilers (ID Unit 1 Boiler and Unit 2 Boiler) shall be limited by the following:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = pounds of particulate matter emitted per million Btu heat input
Q = total source maximum operating capacity rating in MMBtu per hour heat input.

This is equivalent to 0.494 pounds of PM per MMBtu of heat input for each boiler or 5.13 pounds of PM per hour for each boiler.

(b) Pursuant to 326 IAC 6-2-4 (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)), particulate emissions from each of the two (2) boilers (ID Unit 3 Boiler and Unit 4 Boiler) shall be limited by the following:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = pounds of particulate matter emitted per million Btu heat input
Q = total source maximum operating capacity rating in MMBtu per hour heat input.

This is equivalent to 0.413 pounds of PM per MMBtu of heat input for each boiler or 4.29 pounds of PM per hour for each boiler.

D.1.3 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 these facilities and any control devices.

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

D.1.4 Record Keeping Requirements [326 IAC 12] [40 CFR 60.40c - 60.48c]

(a) Pursuant to CP-163-4433-00107, issued June 30, 1995, each of the two (2) boilers (ID Unit 1 Boiler and Unit 2 Boiler), which only combust natural gas, shall comply with the record keeping and reporting requirements under 40 CFR 60.48c (a) and (g). This source has complied with the notification requirements under 40 CFR 60.48c (a). The applicable record keeping requirements are as follows:

(1) The Permittee shall record and maintain records for a period of two years of the amounts of each fuel combusted during each day.

(b) Each of the two (2) boilers (ID Unit 3 Boiler and Unit 4 Boiler), which only combust natural gas, shall comply with the record keeping and reporting requirements under 40 CFR 60.48c (a) and (g). The applicable record keeping requirements are as follows:

(1) The Permittee shall record and maintain records for a period of two years of the amounts of each fuel combusted during each day.

(c) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the Unit 1 Boiler, Unit 2 Boiler, Unit 3 Boiler and Unit 4 Boiler stack exhaust once per shift.

(d) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

SECTION D.2 FACILITY OPERATION CONDITIONS

(c) one (1) corn receiving pit, identified as Corn Receiving Pit C, constructed in 1995, exhausting through stack (ID Stack 1), located in an enclosed building, with a maximum capacity of 203 metric tons per hour, equipped with a grain scalper to remove foreign material from the corn, with a baghouse (ID B1) for particulate matter control, exhausting through one (1) stack (ID Stack 51);

(d) three (3) corn receiving pits with hoods, identified as Corn Receiving Pit A, B, and D, each with a maximum capacity of 203 metric tons per hour, each with a baghouse (ID 1, 101, and 51), exhausting through stacks (ID Stacks 1, 101 and 206), each equipped with a grain scalper (A, B, & D) to remove foreign material from the corn, each scalper with a baghouse (ID 2, 102, and 52) for particulate matter control, each exhausting through its own stack (ID Stacks 2, 102 and 52);

(e) one (1) Grain receiving pit scalper C, associated with existing Grain receiving Pit C, with a baghouse (ID 106) for particulate matter control, exhausting through one (1) stack (ID Stack 106);

(f) two (2) corn screeners, identified as Unit 1 Screener and Unit 2 Screener, constructed in 1995 and 1996 respectively, one with a maximum capacity of 30 metric tons per hour and the other one with a maximum capacity of 100 metric tons per hour, with a baghouse (ID B1) for particulate matter control, exhausting through one (1) stack (ID Stack 6);

(g) one (1) lime bin system, constructed in 1995, with a maximum throughput capacity of 22.5 metric tons per hour, using a baghouse (ID B2) for particulate matter control, exhausting through one (1) stack (ID Stack 9);

(h) one (1) lime bin system, with a maximum throughput capacity of 22.5 metric tons per hour, using a baghouse (ID Baghouse) for particulate matter control, exhausting through one (1) stack (ID Stack 209);

(i) one (1) drying line, identified as C101, constructed in 1995, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as “Unit 1, Drying First Circuit Cyclone”, for particulate matter control, and a heat recovery system and wet scrubber for recovering residual heat, exhausting through one (1) stack (ID Stack 10);

(j) one (1) drying line, identified as C102, constructed in 1996, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as “Unit 2, Drying First Circuit Cyclone”, for particulate matter control, and a heat recovery system and wet scrubber for recovering residual heat, exhausting through one (1) stack (ID Stack 110);

(k) one (1) drying line, identified as C201, constructed in 1995, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour, with a cyclone, identified as “Unit 1, Drying Second Circuit Cyclone”, for particulate matter control, exhausting through one (1) stack (ID Stack 11);

(l) one (1) drying line, identified as C202, constructed in 1996, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour, with a cyclone, identified as “Unit 2, Drying Second Circuit Cyclone”, for particulate matter control, exhausting through one (1) stack (ID Stack 111);

(m) one (1) drying line, identified as C103, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as “Unit 3, Drying First Circuit Cyclone”, for particulate matter control, and a heat recovery system and wet scrubber for recovering residual heat, exhausting through one (1) stack (ID Stack 210);

(n) one (1) drying line, identified as C104, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as “Unit 4, Drying First Circuit Cyclone”, for particulate matter control, and a heat recovery system and wet scrubber for recovering residual heat, exhausting through one (1) stack (ID Stack 310);

(o) one (1) drying line, identified as C203, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour, with a cyclone, identified as "Unit 3, Drying Second Circuit Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 211);

(p) one (1) drying line, identified as C204, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour, with a cyclone, identified as "Unit 4, Drying Second Circuit Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 311);

(q) one (1) flour cooler, identified as FC1, constructed in 1995, with a maximum capacity of 9.32 metric tons per hour, with a cyclone, identified as "Flour Cooler Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 12);

(r) one (1) flour cooler, identified as FC2, constructed 1996, with a maximum capacity of 9.32 metric tons per hour, with a cyclone, identified as "Flour Cooler Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 112);

(s) one (1) flour cooler, identified as FC3, with a maximum capacity of 9.32 metric tons per hour, with a cyclone, identified as "Flour Cooler Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 212);

(t) one (1) flour cooler, identified as FC4, with a maximum capacity of 9.32 metric tons per hour, with a cyclone, identified as "Flour Cooler Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 312);

(u) one (1) flour sifter system, identified as FS1, constructed in 1995, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B3) for particulate matter control, exhausting through one (1) stack (ID Stack 13);

(v) one (1) flour sifter system, identified as FS2, constructed in 1996, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B4) for particulate matter control, exhausting through one (1) stack (ID Stack 113);

(w) one (1) flour sifter system, identified as FS3, with a maximum capacity of 9.32 metric tons per hour, with three (3) separate steps, each using a baghouse for particulate matter control, exhausting through three (3) stacks (ID Stack 254, 255, & 256);

(x) one (1) flour sifter system, identified as FS4, with a maximum capacity of 9.32 metric tons per hour, with three (3) separate steps, each using a baghouse for particulate matter control, exhausting through three (3) stacks (ID Stack 354, 355, & 356);

(y) one (1) milled and dried flour unit, identified as MDF1, constructed in 1995, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B5) for particulate matter control, exhausting through one (1) stack (ID Stack 14);

(z) one (1) milled and dried flour unit, identified as MDF2, constructed in 1996, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B6) for particulate matter control, exhausting through one (1) stack (ID Stack 114);

(aa) one (1) milled and dried flour unit, identified as MDF3, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B) for particulate matter control, exhausting through one (1) stack (ID Stack 214);

(bb) one (1) milled and dried flour unit, identified as MDF4, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B) for particulate matter control, exhausting through one (1) stack (ID Stack 314);

(cc) one (1) corn skin separator, identified as CSS1, constructed in 1995, with a maximum capacity of 0.647 ton per hour, using a baghouse (ID B8) for particulate matter control, exhausting through one (1) stack (ID Stack 40);

(dd) one (1) pair of corn skin separators, identified as CSS2N and CSS2S, constructed in 1996, each with a maximum capacity of 0.323 ton per hour, each using a baghouse (ID B9N and B9S, respectively) for particulate matter control, each exhausting through one (1) stack (ID Stacks 140N and 140S, respectively);

(ee) one (1) pair of corn skin separator, identified as CSS3N and CSS3S, each with a maximum capacity of 0.647 ton per hour, each using a baghouse (IDs BN and BS respectively) for particulate matter control, exhausting through one stack (IDs Stack 240N and 240S respectively);

(ff) one (1) pair of corn skin separators, identified as CSS4N and CSS4S, each with a maximum capacity of 0.323 ton per hour, each using a baghouse (ID BN and BS, respectively) for particulate matter control, each exhausting through one (1) stack (ID Stacks 340N and 340S, respectively);

(gg) one (1) corn skin storage system, constructed in 1995, with a maximum capacity of 1.294 metric tons per hour, using a baghouse (ID B9) for PM control, exhausting through one (1) stack (ID Stack 15);

(hh) one (1) rail loading system, constructed in 1995, with a maximum capacity of 21.77 metric tons per hour, with a three way valve leading to three flexible lines, using a pneumatic filtering device (ID B10) for particulate matter control, exhausting indoors (ID Stack 49);

(ii) one (1) truck loading system, constructed in 2002, sharing a pneumatic filtering device with the rail loading system for particulate matter control, exhausting indoors; and

(jj) six (6) natural gas fired grain dryers, identified as GD-1, GD-2, GD-3, GD-4, GD-5 and GD-6, each with a maximum heat input rate of 16.80 mm Btu per hour.

(kk) two (2) rework mill cooling fans, each exhausting through separate stacks (ID Stacks 253 and 353), respectively.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a)(Non-attainment Area Particulate Limitations), particulate matter (PM) emissions from the facilities listed below shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf). The equivalent pound per hour emission rates are calculated as follows:

Facility ID	Stack ID	Air Flow Rate (acfm)	326 IAC 6-1-2 allowable PM emission rate (lb/hr)
Corn Receiving & Screening	6	3000.00	0.77
Lime Bin System	9	149	0.04
C101 Drying Line	10	45000	11.57
C201 Drying Line	11	35000	9.0
C102 Drying Line	110	45000	11.57
C202 Drying Line	111	35000	9.0
Flour Cooler FC1	12	12000	3.09
Flour Cooler FC2	112	12000	3.09
Flour Sifter System FS1	13	366	0.09
Flour Sifter System FS2	113	366	0.09
Milled & Dried Flour Unit MDF1	14	1450	0.37
Milled & Dried Flour Unit MDF2	114	1450	0.37
Corn Skin Separator CSS1	40	6518	1.68
Corn Skin Separator CSS2N	140N	6518	1.68
Corn Skin Separator CSS2S	140S	6518	1.68
Corn Skin Storage System	15	4000	1.03
Rail Loading System	49	1396	0.36
C103 Drying Line	210	45000.00	11.57
C104 Drying Line	310	45000.00	11.57
C203 Drying Line	211	35000.00	9.00
C204 Drying Line	311	35000.00	9.00
Corn Skin Separator CSS3N	240N	4000.00	1.03
Corn Skin Separator CSS3S	240S	4000.00	1.03
Corn Skin Separator CSS4N	340N	4000.00	1.03
Corn Skin Separator CSS4S	340S	4000.00	1.03
Flour Sifter System FS3 (Step1)	254	1300.00	0.33
Flour Sifter System FS3 (Step2)	255	8800.00	2.26
Flour Sifter System FS3 (Step3)	256	8900.00	2.29
Flour Sifter System FS4 (Step1)	354	360.00	0.09
Flour Sifter System FS4 (Step2)	355	8900.00	2.29
Flour Sifter System FS4 (Step3)	356	8800.00	2.26
Grain Receiving Pit A Hood	1	3000.00	0.77
Grain Receiving Pit B Hood	101	3000.00	0.77
Grain Receiving Pit C Hood	51	10000.00	2.57
Grain Receiving Pit D Hood	206	10000.00	2.57
Grain Receiving Pit A Scalper	2	10000.00	2.57
Grain Receiving Pit B Scalper	102	10000.00	2.57
Grain Receiving Pit C Scalper	106	8500.00	2.19
Grain Receiving Pit D Scalper	52	10000.00	2.57
Lime Hopper System	209	521.00	0.13
Milled & Dried Flour Unit MDF3	214	1200.00	0.31
Milled & Dried Flour Unit MDF4	314	1450.00	0.37
Rework Mill Cooling Fan I	253	4000.00	1.03
Rework Mill Cooling Fan II	353	4000.00	1.03
Flour Cooler FC3	212	12000.00	3.09
Flour Cooler FC4	312	12000.00	3.09

D.2.2 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 these facilities and their control devices.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

(a) During the period between 12 and 18 months after issuance of this permit, in order to demonstrate compliance with Condition D.2.2, the Permittee shall perform PM testing on baghouse B1 (Stack 6), the Unit 1, Drying First Circuit Cyclone (Stack 10), the Unit 1, Drying Second Circuit Cyclone (Stack 11), the Flour Cooler Cyclone (Stack 12), baghouse B8 (Stack 40), and baghouse B9 (Stack 15), utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

(b) During the period within 180 days after start-up upon achieving the increased production rate, in order to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM testing on the baghouse 1 (Stack 1), the Unit 3, Drying First Circuit Cyclone (Stack 210), the Unit 3, Drying Second Circuit Cyclone (Stack 211), the Flour Cooler Cyclone (Stack 212) and the baghouse BN (Stack 240N), utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C-Performance Testing.

D.2.4 Particulate Matter (PM)

(a) Pursuant to CP-163-4433-00107, issued on June 30, 1995, and in order to comply with Condition D.2.1:

(1) the baghouses for PM control shall be in operation and control emissions from the corn receiving pit, the corn screeners, the lime bin system, the two (2) flour sifter systems, the two (2) milled and dried flour units, the three (3) corn skin separators, and the corn skin storage system at all times that these facilities are in operation.

(2) The cyclones shall be in operation and control emissions from the four (4) drying lines and the two (2) flour coolers at all times that these facilities are in operation.

(3) The cartridge filter shall be in operation and control emissions from the rail loading system at all times that the rail loading system is in operation.

(b) In order to comply with Condition D.2.1:

(1) the baghouses for PM control shall be in operation and control emissions from the three (3) grain receiving pit hoods, A, B, and D, four (4) grain receiving pit scalpers, A, B, C and D, one (1) lime bin system, two (2) milled and dried flour units, MDF3 and MDF4, two (2) flour sifter systems, FS3 and FS4, two (2) rework mill cooling fans and four (4) corn skin separators, CSS3N, CSS3S, CSS3N and CSS4S at all times that these facilities are in operation.

(2) The cyclones shall be in operation and control emissions from the four (4) drying lines, C103, C104, C203 and C204 and the two (2) flour coolers, FC3 and FC4 at all times that these facilities are in operation.

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

D.2.5 Visible Emissions Notations

(a) Visible emission notations of each of the cyclone stacks identified as Stacks 10, 110, 210 and 310 shall be performed once per shift 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 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 deviation from this permit.

D.2.6 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the C101, C102, C103 and C104 Drying Lines when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months.

D.2.7 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of each of the cyclone stack exhausts identified as Stacks 10, 110, 210 and 310 once per shift.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain the following for each cyclone:

(1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

(2) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.

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

SECTION D.3 FACILITY OPERATION CONDITIONS

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

Insignificant Activities

(a) Other categories with PM emissions below insignificant thresholds:

(1) twenty-four (24) flour storage bins, each with one (1) baghouse for PM emissions control, each exhausting through one stack (ID Stacks 16 through 39). [326 IAC 6-1-2]

(2) twenty-four (24) flour storage bins, each with one (1) baghouse for PM, each exhausting through one stack (ID Stacks 55 through 78); [326 IAC 6-1-2]

(3) a pneumatic conveying system for collection of flour from storage bins, with six (6) baghouses for PM emissions control, exhausting through six (6) stacks (ID Stacks 43 through 48), respectively . [326 IAC 6-1-2]

(4) a pneumatic conveying system for collection of flour from storage bins, with two (2) baghouses for PM emissions control, exhausting through two (2) stacks (ID Stacks 251 and 252); [326 IAC 6-1-2]

(5) two (2) rework bins, each with one (1) baghouse for PM emissions control, each exhausting through one (1) stack (ID Stacks 41 and 42). [326 IAC 6-1-2]

(6) two (2) rework bins, each with one (1) baghouse for PM emissions control, each exhausting through one (1) stack (ID Stacks 241 and 242); [326 IAC 6-1-2]

(7) one (1) ingredients hopper, with one (1) baghouse for PM emissions control exhausting through one (1) stack (ID Stack 53). [326 IAC 6-1-2]

(8) two (2) packaging machines, with one (1) baghouse for PM emissions control, exhausting through one (1) stack (ID Stack 50). [326 IAC 6-1-2]

(9) sack dumping, exhausting indoors through one (1) stack (ID Stack 54). [326 IAC 6-1-2]

(10) two (2) lime hoppers, each with a maximum throughput capacity of 8.3 metric tons per hour, each exhausting through one (1) stack (ID Stacks 8 and 108). [326 IAC 6-1-2]

(11) two (2) lime hoppers, each with a maximum throughput capacity of 8.3 metric tons per hour, each exhausting through one (1) stack (ID Stacks 208 and 308); [326 IAC 6-1-2]

(12) one (1) 6.0 million Btu per hour natural gas fired wet cake dryer, with an airflow rate of 4226 dry standard cubic feet per minute (dscf/min); [326 IAC 6-1-2]

(13) one (1) 6.0 million Btu per hour natural gas fired wet cake dryer, with an airflow rate of 4226 dry standard cubic feet per minute (dscf/min). [326 IAC 6-1-2]

(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 6-1-2]

Pursuant to 326 IAC 6-1-2(a)(Non-attainment Area Particulate Limitations), particulate matter (PM) emissions from each of the facilities listed above shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

Compliance Determination Requirements

D.3.2 Particulate Matter (PM)

The baghouses for PM control shall be in operation and control emissions from the forty-eight (48) flour storage bins, the two (2) pneumatic conveying systems, the four (4) rework bins, the ingredients hopper, the two (2) packaging machines, the sack dumping operation, and the four (4) lime hoppers at all times that these facilities are in operation.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	**Azteca Milling, L.P.**
Source Location:	**15700 Highway 41 North, Evansville, Indiana 47711**
County:	**Vanderburgh**
SIC Code:	**2046**
Operation Permit No.:	**T163-7995-00107**
Operation Permit Issuance Date:	**February 28, 2001**
Significant Source Modification No.:	**163-18534-00107**
Significant Permit Modification No.:	**163-18652-00107**
Permit Reviewer:	**Seema Roy/EVP**

The Office of Air Quality (OAQ) has reviewed a modification application from Azteca Milling, L.P. relating to the construction and operation of the following emission units and pollution control devices, and doubling of the maximum corn flour production rate from 160,000 metric tons per year to 320,000 metric tons per year at this existing stationary wet corn milling source.

(a) two (2) natural gas-fired steam boilers, identified as, Unit 3 Boiler and Unit 4 Boiler, each rated at 10.46 million (MM) British thermal units (Btu) per hour, each exhausting through separate stacks (ID Stacks 207 and 302), respectively;

(b) three (3) corn receiving pits with hoods , identified as Corn Receiving Pit A, B, and D, each with a maximum capacity of 203 metric tons per hour, each with a baghouse (ID 1, 101, and 51), exhausting through stacks (ID Stacks 1, 101 and 51), each equipped with a grain scalper (A, B, & D) to remove foreign material from the corn, each scalper with a baghouse (ID 2, 102, and 52) for particulate matter control, each exhausting through its own stack (ID Stacks 2, 102 and 52);

(c) one (1) Grain receiving pit scalper C, associated with existing Grain receiving Pit C, with a baghouse (ID 106) for particulate matter control, exhausting through one (1) stack (ID Stack 106);

(d) one (1) lime bin system, with a maximum throughput capacity of 22.5 metric tons per hour, using a baghouse (ID Baghouse) for particulate matter control, exhausting through one (1) stack (ID Stack 209);

(e) one (1) drying line, identified as C103, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as “Unit 3, Drying First Circuit Cyclone”, for particulate matter control, and a heat recovery system and wet scrubber for recovering residual heat, exhausting through one (1) stack (ID Stack 210);

(f) one (1) drying line, identified as C104, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as “Unit 4, Drying First Circuit Cyclone”, for particulate matter control, and a heat recovery system and wet scrubber for recovering residual heat, exhausting through one (1) stack (ID Stack 310);

(g) one (1) drying line, identified as C203, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour, with a cyclone, identified as “Unit 3, Drying Second Circuit Cyclone”, for particulate matter control, exhausting through one (1) stack (ID Stack 211);

(h) one (1) drying line, identified as C204, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour, with a cyclone, identified as “Unit 4, Drying Second Circuit Cyclone”, for particulate matter control, exhausting through one (1) stack (ID Stack 311);

(i) one (1) flour cooler, identified as FC3, with a maximum capacity of 9.32 metric tons per hour, with a cyclone, identified as “Flour Cooler Cyclone”, for particulate matter control, exhausting through one (1) stack (ID Stack 212);

(j) one (1) flour cooler, identified as FC4, with a maximum capacity of 9.32 metric tons per hour, with a cyclone, identified as “Flour Cooler Cyclone”, for particulate matter control, exhausting through one (1) stack (ID Stack 312);

(k) one (1) flour sifter system, identified as FS3, with a maximum capacity of 9.32 metric tons per hour, with three (3) separate steps, each using a baghouse for particulate matter control, exhausting through three (3) stacks (ID Stack 254, 255, & 256);

(l) one (1) flour sifter system, identified as FS4, with a maximum capacity of 9.32 metric tons per hour, with three (3) separate steps, each using a baghouse for particulate matter control, exhausting through three (3) stacks (ID Stack 354, 355, & 356);

(m) one (1) milled and dried flour unit, identified as MDF3, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B) for particulate matter control, exhausting through one (1) stack (ID Stack 214);

(n) one (1) milled and dried flour unit, identified as MDF4, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B) for particulate matter control, exhausting through one (1) stack (ID Stack 314);

(o) one (1) pair of corn skin separators, identified as CSS3N and CSS3S, each with a maximum capacity of 0.647 ton per hour, each using a baghouse (IDs BN and BS respectively) for particulate matter control, exhausting through one stack (IDs Stack 240N and 240S respectively);

(p) one (1) pair of corn skin separators, identified as CSS4N and CSS4S, each with a maximum capacity of 0.323 ton per hour, each using a baghouse (ID BN and BS, respectively) for particulate matter control, each exhausting through one (1) stack (ID Stacks 340N and 340S, respectively); and

(q) six (6) natural gas fired grain dryers, identified as GD-1, GD-2, GD-3, GD-4, GD-5 and GD-6, each with a maximum heat input rate of 16.80 mm Btu per hour.

Insignificant Activities:

(a) twenty-four (24) flour storage bins, each with one (1) baghouse for PM, each exhausting through one stack (ID Stacks 55 through 78); [326 IAC 6-1-2]

(b) a pneumatic conveying system for collection of flour from storage bins, with two (2) baghouses for PM emissions control, exhausting through two (2) stacks (ID Stacks 251 and 252); [326 IAC 6-1-2]

(c) two (2) rework bins, each with one (1) baghouse for PM emissions control, each exhausting through one (1) stack (ID Stacks 241 and 242); [326 IAC 6-1-2]

(d) two (2) lime hoppers, each with a maximum throughput capacity of 8.3 metric tons per hour, each exhausting through one (1) stack (ID Stacks 208 and 308); and

(e) one (1) 6.0 million Btu per hour natural gas fired wet cake dryer, with an airflow rate of 4226 dry standard cubic feet per minute (dscf/min).

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

The source has been operating under the following previous approvals:

(a) Part 70 Operating Permit T163-7995-00107, issued on February 28, 2001;

(b) First Administrative Amendment 163-16010-00107; issued on September 20, 2002;

(c) First Significant Permit Modification 163-15980-00107, issued on October 22, 2002; and

(d) Second Administrative Amendment 163-17718-00107, issued on September 8, 2003.

Air Pollution Control Justification as an Integral Part of the Process

The new baghouses, cartridge filters, and cyclones being added are identical to the existing baghouses, cartridge filters, and cyclones. Therefore, they are considered as an integral part of the milling operation as was determined in Part 70 Permit T163-7995-00107, issued on February 28, 2001, for the existing control devices. The permitting level will be determined using the potential to emit after control by the baghouses, cartridge filters, and cyclones. Operating conditions in the proposed permit will specify that the baghouses, cartridge filters, and cyclones shall operate at all times when the milling operations are in operation.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Source Modification and the Significant Permit Modification, be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on February 12, 2004. Additional information was received on March 10, 2004.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 to 3).

Potential To Emit Before Controls (Modification)

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."

This table reflects the potential to emit (PTE) before controls for the modification. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	231.75
PM-10	236.74
SO_2	0.52
VOC	13.22*
CO	73.48
NO_x	87.48

*Includes VOC emission from combustion sources and the four drying lines C101, C102, C103 and C104. VOC emissions from the drying line C101 were determined to be 0.48 lbs/hr from the stack test conducted at the source using method 25 A.

HAP's	Potential To Emit (tons/year)
Hexane	1.53
TOTAL	1.6

Justification for Modification

The Part 70 operating permit is being modified through both a Part 70 Significant Source Modification and Significant Permit Modification. These modifications are being performed based on the following justification:

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10 and NO_x are equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7-10.5(f)(4) for this significant source modification. The Significant Source Modification will give the source approval to construct the proposed emission units.

(b) The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as Significant Permit Modification No. 039-18652-00152 in accordance with 326 IAC 2-7-12(d). The Significant Permit Modification will give the source approval to operate the proposed emission units.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
1-hour Ozone	attainment
8-hour Ozone	nonattainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Vanderburgh County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.

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

Note: Although this source is located in Evansville, Indiana, it is outside of a 4-mile radius of the corporate limits of the city of Evansville, therefore, this source is not under the jurisdiction of the Evansville EPA, a local agency. This has been confirmed by the inspector for this source.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	192.65
PM-10	194.27
SO_2	0.16
VOC	1.46
CO	23.14

NOx	27.52
Single HAP	negligible
Total HAPs	negligible

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories.

(c) These emissions are based upon the Technical Support Document to the Part 70 Permit No. T163-7995-00107, issued on February 28, 2001 and Second Administrative Amendment 163-17718-00107, issued on September 8, 2003.

Potential to Emit After Issuance for the Modification

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

	Potential to Emit (PTE) of Modification After Issuance (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Boilers 3 and 4	0.18	0.70	0.06	0.50	7.7	9.16	negl.
Grain Dryers GD1-GD6	0.84	3.36	0.24	2.4	37.08	44.16	negl.
Cake dryer	0.05	0.20	0.02	0.14	2.21	2.63	negl.
2nd Circuit Drying Lines C201 and C202*	0.14	0.60	0.04	0.44	6.62	7.88	negl.
3rd Circuit Drying Lines C103 and C104**	88.15	89.05	0.10	5.06*****	13.24	15.76	negl.
4th Circuit Drying Lines C203 and C204***	71.10	71.56	0.04	0.44	6.62	7.88	negl.
Corn Skin Separators	2.10	2.10	0.00	0.00	0.00	0.00	0.00
Flour Sifter Systems	19.48	19.48	0.00	0.00	0.00	0.00	0.00
Grain Receiving Pit Hoods A, B and D	6.01	6.01	0.00	0.00	0.00	0.00	0.00
Grain Receiving Pit Scalpers A, B, C and D	14.45	14.45	0.00	0.00	0.00	0.00	0.00
Lime Hopper System	0.17	0.17	0.00	0.00	0.00	0.00	0.00
Milled and Dried Flour Units	0.85	0.85	0.00	0.00	0.00	0.00	0.00
Rework Mill Cooling Fans	3.00	3.00	0.00	0.00	0.00	0.00	0.00
Flour Coolers	25.23	25.23	0.00	0.00	0.00	0.00	0.00
Total PTE of Modification ****	231.75	236.76	0.52	8.98	73.48	87.48	1.6
PSD Threshold	250	250	250	250	250	250	N/A

* Note: The combustion emissions from flour dryers C201 and C202 were not included in the existing Part 70 Permit and therefore they have been included in this modification.
** Emissions from 3rd Circuit Drying represent potential controlled emissions and include combustion emissions from flour dryers.
*** Emissions from 4th Circuit Drying represent potential controlled emissions and include combustion emissions from flour dryers.
**** Total emissions include emissions from Insignificant Activities (24 flour storage bins, flour pneumatic conveying system, rework bins, ingredients hopper, packing lines, and sack dumping), which are negligible because they are identical to existing Insignificant Activities, which were determined to be negligible based on stack test data that indicated 0% opacity readings for these operations.
*****Includes VOC emission from combustion sources at the drying lines C103 and C104 and VOC emissions from the corn drying process at C103 and C104. VOC emissions from the drying line C101 were determined to be 0.48 lbs/hr from the stack test conducted at the source using method 25 A.

	Potential to Emit (PTE) of Source After Issuance (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Total PTE of Modification	231.75	236.76	0.52	8.98	73.48	87.48	1.6
Existing Boilers	0.18	0.70	0.06	0.50	7.7	9.16	<1
Existing Corn Receiving and Screening	1.13	1.13	0.0	0.0	0.0	0.0	0.0
Existing Lime Bin System	0.05	0.05	0.0	0.0	0.0	0.0	0.0
Existing 1st Circuit Drying Lines C101 and C102	88.16	89.06	0.10	5.06	13.24	15.76	negl.
Existing 2nd Circuit Drying Lines C201 and C202	70.96	70.96	0.0	0.0	0.0	0.0	0.0
Existing Flour Coolers	25.22	25.22	0.0	0.0	0.0	0.0	0.0
Existing Flour Sifter Systems	0.38	0.38	0.0	0.0	0.0	0.0	0.0
Existing Milled and Dried Flour Units	0.92	0.92	0.0	0.0	0.0	0.0	0.0
Existing Corn Skin Separators	2.58	2.58	0.0	0.0	0.0	0.0	0.0
Existing Corn Skin Storage	1.50	1.50	0.0	0.0	0.0	0.0	0.0
Existing Rail Loading System	1.57	1.57	0.0	0.0	0.0	0.0	0.0
Total PTE for Source after Issuance	424.40	430.83	0.68	14.54	94.42	112.40	<2.6
PSD Threshold	250	250	250	250	250	250	N/A

(a) This modification to an existing minor stationary source is not major because the emission increase of the modification is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(b) This existing source will change the PSD minor status after the modification because the emissions from the entire source will be greater than the PSD major source thresholds. Therefore, for any further modifications resulting in emissions greater than the thresholds presented in 326 IAC 2-2-1(hh) shall require PSD review.

Federal Rule Applicability

(a) The grain handling operations, which include the three (3) grain receiving pit hoods A, B and D, four (4) grain receiving pit scalpers A, B, C and D and the six (6) grain dryers (GD1, GD2, GD3, GD4, GD5 and GD6) are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.300 - 60.304, Subpart DD, "Standards of Performance for Grain Elevators") because they are part of a grain storage elevator at a wet corn mill plant that has a storage capacity of less than one million (1,000,000) bushels.

Note: The existing grain handling operations, which are the corn screeners, the corn skin storage system, and the railcar unloading operation were subject to New Source Performance Standard, 326 IAC 12, (40 CFR 60.300 - 60.304, Subpart DD, "Standards of Performance for Grain Elevators") in the Part 70 Permit No. T163-7995-00107. However, these units are also not subject to this rule because they are part of a grain storage elevator at a wet corn mill plant that has a storage capacity of less than one million (1,000,000) bushels. The Part 70 Permit No. T163-7995-00107 erroneously stated that the permanent storage capacity was greater than one (1) million bushels. This has been corrected in this modification.

(b) The two (2) steam boilers, identified as Unit 3 Boiler and Unit 4 Boiler, are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c - 60.48c, Subpart Dc, "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units") because they are each to be constructed after the June 9, 1989 rule applicability date, and each has a maximum design heat input capacity greater than 10 MMBtu per hour and less than 100 MMBtu per hour. However, since each of these boilers only combusts natural gas, they are subject only to the record keeping and reporting requirements under 40 CFR 60.48c (a) and (g). The applicable record keeping and reporting requirements are as follows:

(1) The Permittee shall record and maintain records for a period of two years of the amounts of each fuel combusted during each day.

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

The two (2) boilers (ID Unit 3 Boiler and Unit 4 Boiler) are not subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD because they are not located at a major source of HAP as defined in 40 CFR 63.2.

(d) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:

(1) The unit is subject to an emission limitation or standard for an applicable regulated air pollutant,

(2) The unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and

(3) The unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to classified as a Part 70 major source.

This modification does not contain any unit that has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of any pollutant required for the source to be classified as a Part 70 major source. Therefore, this modification is not subject to the requirements of 40 CFR 64.

Note: The new baghouses, cartridge filters, and cyclones being added are identical to the existing baghouses, cartridge filters, and cyclones. Therefore, they are considered as an integral part of the milling operation as was determined in Part 70 Permit T163-7995-00107, issued on February 28, 2001, for the existing control devices. The permitting level will be determined using the potential to emit after the baghouses, cartridge filters, and cyclones. Operating conditions in the proposed permit will specify that the baghouses, cartridge filters, and cyclones shall operate at all times when the milling operations are in operation.

State Rule Applicability - Entire Source

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

This modification to an existing minor stationary source, which is not one of the 28 listed source categories, is not major because the modification does not have the potential to emit of 250 tons per year or more of any criteria pollutant after enforceable controls and limitations. However, the PSD status of the existing source will change after the modification because the emissions from the entire source will be greater than the PSD major source thresholds. Therefore, for any further modifications resulting in emissions greater than the thresholds presented in 326 IAC 2-2-1(hh), the source shall require PSD review.

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any single HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). This rule does not apply to this modification because the modification does not have a potential to emit (PTE) 10 tons per year of any single HAP or 25 tons per year of the combination of HAPs.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2006 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

(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.

Note: Although this source is located in Evansville, Indiana, it is outside of a 4-mile radius of the corporate limits of the city of Evansville and not in Pigeon Township, therefore, 326 IAC 5-1-2(2) does not apply.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions because this rule applies to all sources of fugitive dust. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

State Rule Applicability - Individual Facilities

326 IAC 6-1-2 (Non-attainment Area Particulate Limitations)

All the facilities to be constructed in this modification are subject to this rule because this source is located in Vanderburgh county which is one of the specifically listed counties under 326 IAC 6-1-7 and has potential particulate matter emissions greater than 100 tons per year. Pursuant to 326 IAC 6-1-2(a), particulate matter emissions from the facilities listed below shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf). The equivalent pound per hour emission rates are calculated as follows:

Facility ID	Stack ID	Air Flow Rate (acfm)	326 IAC 6-1-2 allowable PM emission rate (lb/hr)	Controlled PM emission rate (lb/hr)	In Compliance?
C103 Drying Line	210	45000.00	11.57	10.03	Yes
C104 Drying Line	310	45000.00	11.57	10.03	Yes
C203 Drying Line	211	35000.00	9.00	8.10	Yes
C204 Drying Line	311	35000.00	9.00	8.10	Yes
Corn Skin Separator CSS3N	240N	4000.00	1.03	0.12	Yes
Corn Skin Separator CSS3S	240S	4000.00	1.03	0.12	Yes
Corn Skin Separator CSS4N	340N	4000.00	1.03	0.12	Yes
Corn Skin Separator CSS4S	340S	4000.00	1.03	0.12	Yes
Flour Sifter System FS3 (Step1)	254	1300.00	0.33	0.16	Yes
Flour Sifter System FS3 (Step2)	255	8800.00	2.26	1.06	Yes

Flour Sifter System FS3 (Step3)	256	8900.00	2.29	1.07	Yes
Flour Sifter System FS4 (Step1)	354	360.00	0.09	0.04	Yes
Flour Sifter System FS4 (Step2)	355	8900.00	2.29	1.07	Yes
Flour Sifter System FS4 (Step3)	356	8800.00	2.26	1.06	Yes
Grain Receiving Pit A Hood	1	3000.00	0.77	0.26	Yes
Grain Receiving Pit B Hood	101	3000.00	0.77	0.26	Yes
Grain Receiving Pit D Hood	51	10000.00	2.57	0.86	Yes
Grain Receiving Pit A Scalper	2	10000.00	2.57	0.86	Yes
Grain Receiving Pit B Scalper	102	10000.00	2.57	0.86	Yes
Grain Receiving Pit C Scalper	106	8500.00	2.19	0.73	Yes
Grain Receiving Pit D Scalper	52	10000.00	2.57	0.86	Yes
Lime Hopper System	209	521.00	0.13	0.04	Yes
Milled & Dried Flour Unit MDF3	214	1200.00	0.31	0.09	Yes
Milled & Dried Flour Unit MDF4	314	1450.00	0.37	0.11	Yes
Rework Mill Cooling Fan I	253	4000.00	1.03	0.34	Yes
Rework Mill Cooling Fan II	353	4000.00	1.03	0.34	Yes
Flour Cooler FC3	212	12000.00	3.09	2.88	Yes
Flour Cooler FC4	312	12000.00	3.09	2.88	Yes

The two (2) steam boilers, identified as Unit 3 Boiler and Unit 4 Boiler, are subject to 326 IAC 6-1-2(b). This limits particulate matter emissions from gaseous fuel-fired combustion steam generators to no greater than 0.01 gr/dscf. The two (2) boilers are in compliance with this rule.

Particulate matter emissions from each of the twenty-four (24) flour storage bins, the pneumatic conveying system, the two (2) rework bins, the two (2) lime hoppers and one (1) cake dryer all of which are insignificant activities, shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf) as required by 326 IAC 6-1-2.

This modification is not subject to the requirements of 326 IAC 6-1-2(d) because this grain processing source has a permanent grain storage capacity of less than 1,000,000 U.S. bushels.

326 IAC 6-3-2 (Process Operations)

The facilities for this modification are not subject to the requirements of 326 IAC 6-3-2. This rule does not apply if the limitation established in the rule is less stringent than applicable limitations in 326 IAC 6-1. Since the applicable PM limits established by 326 IAC 6-1-2 are more stringent than the PM limits that would be established by 326 IAC 6-3-2, the more stringent limits apply and the limits pursuant to 326 IAC 6-3-2 do not apply.

326 IAC 6-2-4 (Particulate Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d))

This rule establishes limitations for sources of indirect heating, receiving permits to construct on or after September 21, 1983. The two (2) boilers, identified as Unit 3 Boiler and Unit 4 Boiler are subject to the requirements of 326 IAC 6-2-4 because each of the boilers is to be constructed after the September 21, 1983 rule applicability date.

Pursuant to 326 IAC 6-2-4(a), the PM emissions from each of the two boilers based on a total heat input rate of 41.84 MMBtu per hour, shall be limited to 0.413 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = Pounds of particulate matter emitted per MMBtu heat input.
Q = Total source maximum operating capacity rating in MMBtu per hour.
Q = 41.84 MMBtu/hr

$$Pt = \frac{1.09}{(41.84)^{0.26}} = 0.413 \text{ pound per MMBtu heat input.}$$

The potential particulate matter emission from each of the two boilers is 0.002 pound per MMBtu heat input (based on page 2 of TSD, Appendix A). Therefore, the two boilers will comply with 326 IAC 6-2-4.

Testing Requirements

During the period within 180 days after start-up upon achieving the increased production rate, in order to demonstrate compliance with 326 IAC 6-1-2, the Permittee shall perform PM testing on the baghouse 1 (Stack 1), the Unit 3, Drying First Circuit Cyclone (Stack 210), the Unit 3, Drying Second Circuit Cyclone (Stack 211), the Flour Cooler Cyclone (Stack 212) and the baghouse BN (Stack 240N), utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

1. The Unit 3 Drying 1st Circuit Cyclone and Unit 4 Drying 1st Circuit cyclone have applicable compliance monitoring conditions as specified below:

   (a) Visible emission notations of each of the cyclone stacks identified as Stacks 210 and 310 shall be performed once per shift 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 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 deviation from this permit.

   (f) The Permittee shall record the total static pressure drop across each of the cyclones (ID Unit 3 Drying 1st Circuit Cyclone and Unit 4 Drying 1st Circuit Cyclone) used in conjunction with the C103 and C104 lines, at least once per shift when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 4.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

   The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

(g) An inspection shall be performed each calendar quarter of all cyclones controlling the process when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months.

(h) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the above listed cyclones must operate properly to ensure compliance with 326 IAC 6-1-2 (Non-attainment Area Particulate Limitations) and 326 IAC 2-7 (Part 70).

There are no specific compliance monitoring requirements applicable to the Unit 3 Drying 2nd Circuit Cyclone and Unit 4 Drying 2nd Circuit cyclone, flour coolers FC3 and FC4, because each of them has a cyclone as a control device and the allowable emissions for the controlled pollutant are less than 10 lb/hr.

There are no specific compliance monitoring requirements applicable to the corn skin separators, CSS3N, CSS3S, CSS4N and CSS4S, flour sifter systems, FS3 (Steps 1-3) and FS4(steps 1-3), grain receiving pit hoods A, B and D, grain receiving pit scalpers, A, B, C and D, lime hopper system, milled and dried flour units MDF3 and MDF4 and rework mill cooling fans I and II, because each of them has a baghouse as a control device and the allowable emissions for the controlled pollutant are less than 10 lb/hr.

Note: There are no specific compliance monitoring requirements applicable to the existing corn receiving and screening units controlled by Baghouse B1 and the corn skin storage system controlled by Baghouse B9 because they have a baghouse as a control device and the allowable emissions for the controlled pollutant are less than 10 lb/hr. Therefore, the monitoring requirements for these units in the Part 70 Permit No. T163-7995-00107 has been removed in this modification. The Source also requested to change the pressure drop range for the existing cyclones from 1.0 to 6.0 inches of water to 6.0 to 14.0 inches of water. However, since the difference between the two (2) readings cannot be greater than 7.0 inches, the pressure drop range for the existing cyclones has been changed to 6.0 to 13.0 inches of water.

2. The two (2) steam boilers, identified as Unit 3 Boiler and Unit 4 Boiler, have applicable compliance monitoring conditions as specified below:

(a) Visible emission notations of the Unit 3 Boiler and Unit 4 Boiler stack exhausts shall be performed once per shift 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 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 deviation from this permit.

These monitoring conditions are necessary because the above listed boilers must operate properly to ensure compliance with 40 CFR 60.40c - 60.48c, Subpart Dc, 326 IAC 6-1-2 (Non-attainment Area Particulate Limitations), 326 IAC 6-2-4, and 326 IAC 2-7 (Part 70).

Changes to the Part 70 Permit Due to This Modification:

The changes listed below have been made to Part 70 Permit T163-7995-00107. This includes revising Sections A.1, A.2, A.3, condition C.17 of Section C and the equipment description box at Sections D.1, D.2 and D.3, and conditions in Sections D.1, D.2 and D.3 as necessary, to include all the new equipment for the modification. All conditions are renumbered as necessary, without replication herein. The changes to the permit are as follows:

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Vanderburgh County has been designated as nonattaiment for the 8-hour ozone standard. The following has been added to A.1 General Information:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary wet corn milling operation producing corn flour at a maximum rate of ~~160,000~~ **320,000** metric tons per year.

Responsible Official:	~~Antonio Carrillo~~ **Vice President**
Source Address:	15700 Highway 41 North, Evansville, Indiana 47711
Mailing Address:	P.O. Box 23550, Evansville, Indiana 47724
SIC Code:	2046
County Location:	Vanderburgh
Source Location Status:	**Nonattainment for ozone under the 8-hour standard** Attainment for all **other** criteria pollutants
Source Status:	Part 70 Permit Program ~~Minor~~ **Major** Source, under PSD Rules, and Nonattainment NSR;

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

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

(a) two (2) natural gas-fired steam boilers, identified as Unit 1 Boiler and Unit 2 Boiler, constructed in 1995 and 1996 respectively, each rated at 10.46 million (MM) British thermal units (Btu) per hour, each exhausting through one (1) stack (ID Stacks 7 and 107), respectively;

(b) two (2) natural gas-fired steam boilers, identified as, Unit 3 Boiler and Unit 4 Boiler,

each rated at 10.46 million (MM) British thermal units (Btu) per hour, each exhausting through separate stacks (ID Stacks 207 and 302), respectively;

~~(b)~~ **(c)** one (1) corn receiving pit, identified as Corn Receiving Pit C, constructed in 1995, located in an enclosed building, with a maximum capacity of 203 metric tons per hour, equipped with a grain scalper to remove foreign material from the corn, with a baghouse (ID B1) for particulate matter control, exhausting through one (1) stack (ID Stack 6);

(d) three (3) corn receiving pits with hoods , identified as Corn Receiving Pit A, B, and D, each with a maximum capacity of 203 metric tons per hour, each with a baghouse (ID 1, 101, and 51), exhausting through stacks (ID Stacks 1, 101 and 51), each equipped with a grain scalper (A, B, & D) to remove foreign material from the corn, each scalper with a baghouse (ID 2, 102, and 52) for particulate matter control, each exhausting through its own stack (ID Stacks 2, 102 and 52)

(e) one (1) Grain receiving pit scalper C, associated with existing Grain receiving Pit C, with a baghouse (ID 106) for particulate matter control, exhausting through one (1) stack (ID Stack 106);

~~(c)~~ **(f)** two (2) corn screeners, identified as Unit 1 Screener and Unit 2 Screener, constructed in 1995 and 1996 respectively, each with a maximum capacity of 30 metric tons per hour, with a baghouse (ID B1) for particulate matter control, exhausting through one (1) stack (ID Stack 6);

~~(d)~~ **(g)** one (1) lime bin system, constructed in 1995, with a maximum throughput capacity of 22.5 metric tons per hour, using a baghouse (ID B2) for particulate matter control, exhausting through one (1) stack (ID Stack 9);

(h) one (1) lime bin system, with a maximum throughput capacity of 22.5 metric tons per hour, using a baghouse (ID Baghouse) for particulate matter control, exhausting through one (1) stack (ID Stack 209);

~~(e)~~ **(i)** one (1) drying line, identified as C101, constructed in 1995, with a maximum capacity of ~~9.13~~ **9.32** metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as "Unit 1, Drying First Circuit Cyclone", for particulate matter control, and **a** heat recovery system and wet ~~scrubbing~~ **scrubber** for recovering residual heat, exhausting through one (1) stack (ID Stack 10);

~~(f)~~ **(j)** one (1) drying line, identified as C102, constructed in 1996, with a maximum capacity of ~~9.13~~ **9.32** metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as "Unit 2, Drying First Circuit Cyclone", for particulate matter control, and **a** heat recovery system and wet ~~scrubbing~~ **scrubber** for recovering residual heat, exhausting through one (1) stack (ID Stack 110);

~~(g)~~ **(k)** one (1) drying line, identified as C201, constructed in 1995, with a maximum capacity of ~~9.13~~ **9.32** metric tons per hour, **with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour,** with a cyclone, identified as "Unit 1, Drying Second Circuit Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 11);

~~(h)~~ **(l)** one (1) drying line, identified as C202, constructed in 1996, with a maximum capacity of ~~9.13~~ **9.32** metric tons per hour, **with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour,** with a cyclone, identified as "Unit 2, Drying Second Circuit Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 111);

(m) one (1) drying line, identified as C103, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with

a cyclone, identified as "Unit 3, Drying First Circuit Cyclone", for particulate matter control, and a heat recovery system and wet scrubber for recovering residual heat, exhausting through one (1) stack (ID Stack 210);

(n) one (1) drying line, identified as C104, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as "Unit 4, Drying First Circuit Cyclone", for particulate matter control, and a heat recovery system and wet scrubber for recovering residual heat, exhausting through one (1) stack (ID Stack 310);

(o) one (1) drying line, identified as C203, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour, with a cyclone, identified as "Unit 3, Drying Second Circuit Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 211);

(p) one (1) drying line, identified as C204, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour, with a cyclone, identified as "Unit 4, Drying Second Circuit Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 311);

~~(i)~~ **(q)** one (1) flour cooler, identified as FC1, constructed in 1995, with a maximum capacity of ~~9.13~~ **9.32** metric tons per hour, with a cyclone, identified as "Flour Cooler Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 12);

~~(j)~~ **(r)** one (1) flour cooler, identified as FC2, constructed 1996, with a maximum capacity of ~~9.13~~ **9.32** metric tons per hour, with a cyclone, identified as "Flour Cooler Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 112);

(s) one (1) flour cooler, identified as FC3, with a maximum capacity of 9.32 metric tons per hour, with a cyclone, identified as "Flour Cooler Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 212);

(t) one (1) flour cooler, identified as FC4, with a maximum capacity of 9.32 metric tons per hour, with a cyclone, identified as "Flour Cooler Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 312);

~~(k)~~ **(u)** one (1) flour sifter system, identified as FS1, constructed in 1995, with a maximum capacity of ~~9.13~~ **9.32** metric tons per hour, using a baghouse (ID B3) for particulate matter control, exhausting through one (1) stack (ID Stack 13);

~~(l)~~ **(v)** one (1) flour sifter system, identified as FS2, constructed in 1996, with a maximum capacity of ~~9.13~~ **9.32** metric tons per hour, using a baghouse (ID B4) for particulate matter control, exhausting through one (1) stack (ID Stack 113);

(w) one (1) flour sifter system, identified as FS3, with a maximum capacity of 9.32 metric tons per hour, with three (3) separate steps, each using a baghouse for particulate matter control, exhausting through three (3) stacks (ID Stack 254, 255, & 256);

(x) one (1) flour sifter system, identified as FS4, with a maximum capacity of 9.32 metric tons per hour, with three (3) separate steps, each using a baghouse for particulate matter control, exhausting through three (3) stacks (ID Stack 354, 355, & 356);

~~(m)~~ **(y)** one (1) milled and dried flour unit, identified as MDF1, constructed in 1995, with a maximum capacity of ~~9.13~~ **9.32** metric tons per hour, using a baghouse (ID B5) for particulate matter control, exhausting through one (1) stack (ID Stack 14);

~~(n)~~ **(z)** one (1) milled and dried flour unit, identified as MDF2, constructed in 1996, with a maximum capacity of ~~9.13~~ **9.32** metric tons per hour, using a baghouse (ID B6) for particulate matter control, exhausting through one (1) stack (ID Stack 114);

(aa) one (1) milled and dried flour unit, identified as MDF3, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B) for particulate matter control, exhausting through one (1) stack (ID Stack 214);

(bb) one (1) milled and dried flour unit, identified as MDF4, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B) for particulate matter control, exhausting through one (1) stack (ID Stack 314);

~~(o)~~ **(cc)** one (1) corn skin separator, identified as CSS1, constructed in 1995, with a maximum capacity of 0.647 ton per hour, using a baghouse (ID B8) for particulate matter control, exhausting through one (1) stack (ID Stack 40);

~~(p)~~ **(dd)** one (1) pair of corn skin separators, identified as CSS2N and CSS2S, constructed in 1996, each with a maximum capacity of 0.323 ton per hour, each using a baghouse (ID B9N and B9S, respectively) for particulate matter control, each exhausting through one (1) stack (ID Stacks 140N and 140S, respectively);

(ee) one (1) pair of corn skin separators, identified as CSS3N and CSS3S, each with a maximum capacity of 0.647 ton per hour, each using a baghouse (IDs BN and BS respectively) for particulate matter control, exhausting through one stack (IDs Stack 240N and 240S respectively);

(ff) one (1) pair of corn skin separators, identified as CSS4N and CSS4S, each with a maximum capacity of 0.323 ton per hour, each using a baghouse (ID BN and BS, respectively) for particulate matter control, each exhausting through one (1) stack (ID Stacks 340N and 340S, respectively).

~~(q)~~ **(gg)** one (1) corn skin storage system, constructed in 1995, with a maximum capacity of 1.294 metric tons per hour, using a baghouse (ID B9) for PM control, exhausting through one (1) stack (ID Stack 15); and

~~(r)~~ **(hh)** one (1) rail loading system, constructed in 1995, with a maximum capacity of 21.77 metric tons per hour, with a three way valve leading to three flexible lines, using a pneumatic filtering device (ID B10) for particulate matter control, exhausting indoors (ID Stack 49);

~~(s)~~ **(ii)** one (1) truck loading system, constructed in 2002, sharing a pneumatic filtering device with the rail loading system for particulate matter control, exhausting indoors~~.~~ **; and**

(jj) six (6) natural gas fired grain dryers, identified as GD-1, GD-2, GD-3, GD-4, GD-5 and GD-6, each with a maximum heat input rate of 16.80 mm Btu per hour.

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

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

(a) Other categories with PM emissions below insignificant thresholds:

(1) twenty-four (24) flour storage bins, each with one (1) baghouse for PM emissions control, each exhausting through one stack (ID Stacks 16 through 39). [326 IAC 6-1-2]

(2) twenty-four (24) flour storage bins, each with one (1) baghouse for PM, each exhausting through one stack (ID Stacks 55 through 78); [326 IAC 6-1-2]

~~(2)~~ **(3)** a pneumatic conveying system for collection of flour from storage bins, with six (6) baghouses for PM emissions control, exhausting through six (6) stacks (ID Stacks 43 through 48), respectively . [326 IAC 6-1-2]

(4) a pneumatic conveying system for collection of flour from storage bins, with two (2) baghouses for PM emissions control, exhausting through two (2) stacks (ID Stacks 251 and 252); [326 IAC 6-1-2]

~~(3)~~ **(5)** two (2) rework bins, each with one (1) baghouse for PM emissions control, each exhausting through one (1) stack (ID Stacks 41 and 42). [326 IAC 6-1-2]

(6) two (2) rework bins, each with one (1) baghouse for PM emissions control, each exhausting through one (1) stack (ID Stacks 241 and 242); [326 IAC 6-1-2]

~~(4)~~ **(7)** one (1) ingredients hopper, with one (1) baghouse for PM emissions control exhausting through one (1) stack (ID Stack 53). [326 IAC 6-1-2]

~~(5)~~ **(8)** two (2) packaging machines, with one (1) baghouse for PM emissions control, exhausting through one (1) stack (ID Stack 50). [326 IAC 6-1-2]

~~(6)~~ **(9)** sack dumping, exhausting indoors through one (1) stack (ID Stack 54). [326 IAC 6-1-2]

~~(7)~~ **(10)** two (2) lime hoppers, each with a maximum throughput capacity of 8.3 metric tons per hour, each exhausting through one (1) stack (ID Stacks 8 and 108). [326 IAC 6-1-2]

(11) two (2) lime hoppers, each with a maximum throughput capacity of 8.3 metric tons per hour, each exhausting through one (1) stack (ID Stacks 208 and 308); [326 IAC 6-1-2]

~~(8)~~ **(12)** one (1) 6.0 million Btu per hour natural gas fired wet cake dryer, with an airflow rate of 4226 dry standard cubic feet per minute (dscf/min); [326 IAC 6-1-2]

(13) one (1) 6.0 million Btu per hour natural gas fired wet cake dryer, with an airflow rate of 4226 dry standard cubic feet per minute (dscf/min). [326 IAC 6-1-2]

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) two (2) natural gas-fired steam boilers, identified as Unit 1 Boiler and Unit 2 Boiler, constructed in 1995 and 1996 respectively, each rated at 10.46 million (MM) British thermal units (Btu) per hour, each exhausting through one (1) stack (ID Stacks 7 and 107), respectively;

(b) two (2) natural gas-fired steam boilers, identified as, Unit 3 Boiler and Unit 4 Boiler, each rated at 10.46 million (MM) British thermal units (Btu) per hour, each exhausting through separate stacks (ID Stacks 207 and 302), respectively;

(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.1.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(b), particulate matter emissions from each of the ~~two (2)~~ **four (4)** boilers (ID Unit 1 Boiler**,** ~~and~~ Unit 2 Boiler**, Unit 3 Boiler and Unit 4 Boiler**) shall be limited to no greater than 0.01 gr/dscf.

D.1.2 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

(a) Pursuant to 326 IAC 6-2-4 (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (~~c~~ **d**)), particulate emissions from each of the two (2) boilers (ID Unit 1 Boiler and Unit 2 Boiler) shall be limited by the following:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = pounds of particulate matter emitted per million Btu heat input

Q = total source maximum operating capacity rating in MMBtu per hour heat input.

This is equivalent to 0.494 pounds of PM per MMBtu of heat input for each boiler or 5.13 pounds of PM per hour for each boiler.

(b) Pursuant to 326 IAC 6-2-4 (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)), particulate emissions from each of the two (2) boilers (ID Unit 3 Boiler and Unit 4 Boiler) shall be limited by the following:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = pounds of particulate matter emitted per million Btu heat input

Q = total source maximum operating capacity rating in MMBtu per hour heat input.

This is equivalent to 0.413 pounds of PM per MMBtu of heat input for each boiler or 4.29 pounds of PM per hour for each boiler.

D.1.3 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 these facilities and any control devices.

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

~~There are no compliance monitoring requirements specifically applicable to the facility.~~

D.1.4 Visible Emissions Notations

(a) Visible emission notations of the Unit 1 Boiler, Unit 2 Boiler, Unit 3 Boiler and Unit 4 Boiler stack exhaust shall be performed once per shift 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 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 deviation from this permit.

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

D.1.~~4~~ **5** Record Keeping Requirements [326 IAC 12] [40 CFR 60.40c - 60.48c]

(a) Pursuant to CP-163-4433-00107, issued June 30, 1995, each of the two (2) boilers (ID Unit 1 Boiler and Unit 2 Boiler), which only combust natural gas, shall comply with the record keeping and reporting requirements under 40 CFR 60.48c (a) and (g). This source has complied with the notification requirements under 40 CFR 60.48c (a). The applicable record keeping requirements are as follows:

(1) The Permittee shall record and maintain records for a period of two years of the amounts of each fuel combusted during each ~~month~~ **day**.

(b) Each of the two (2) boilers (ID Unit 3 Boiler and Unit 4 Boiler), which only combust natural gas, shall comply with the record keeping and reporting requirements under 40 CFR 60.48c (a) and (g). The applicable record keeping requirements are as follows:

(1) The Permittee shall record and maintain records for a period of two years of the amounts of each fuel combusted during each day.

(c) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the Unit 1 Boiler, Unit 2 Boiler, Unit 3 Boiler and Unit 4 Boiler stack exhaust once per shift.

(d) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

~~D.1.5 Reporting Requirements~~

~~(a) The Permittee shall certify, on the form provided, that natural gas was fired in the boiler at all times during each six (6) month period. Alternatively, the Permittee shall report the number of days during which an alternate fuel was burned during each six (6) month period.~~

SECTION D.2 FACILITY OPERATION CONDITIONS

~~(b)~~ **(c)** one (1) corn receiving pit, identified as Corn Receiving Pit C, constructed in 1995, located in an enclosed building, with a maximum capacity of 203 metric tons per hour, equipped with a grain scalper to remove foreign material from the corn, with a baghouse (ID B1) for particulate matter control, exhausting through one (1) stack (ID Stack 6);

(d) three (3) corn receiving pits with hoods , identified as Corn Receiving Pit A, B, and D, each with a maximum capacity of 203 metric tons per hour, each with a baghouse (ID 1, 101, and 51), exhausting through stacks (ID Stacks 1, 101 and 51), each equipped with a grain scalper (A, B, & D) to remove foreign material from the corn, each scalper with a baghouse (ID 2, 102, and 52) for particulate matter control, each exhausting through its own stack (ID Stacks 2, 102 and 52);

(e) one (1) Grain receiving pit scalper C, associated with existing Grain receiving Pit C, with a baghouse (ID 106) for particulate matter control, exhausting through one (1) stack (ID Stack 106);

~~(c)~~ **(f)** two (2) corn screeners, identified as Unit 1 Screener and Unit 2 Screener, constructed in 1995 and 1996 respectively, each with a maximum capacity of 30 metric tons per hour, with a baghouse (ID B1) for particulate matter control, exhausting through one (1) stack (ID Stack 6);

~~(d)~~ **(g)** one (1) lime bin system, constructed in 1995, with a maximum throughput capacity of 22.5 metric tons per hour, using a baghouse (ID B2) for particulate matter control, exhausting through one (1) stack (ID Stack 9);

(h) one (1) lime bin system, with a maximum throughput capacity of 22.5 metric tons per hour, using a baghouse (ID Baghouse) for particulate matter control, exhausting through one (1) stack (ID Stack 209);

~~(e)~~ **(i)** one (1) drying line, identified as C101, constructed in 1995, with a maximum capacity of ~~9.13~~ **9.32** metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as "Unit 1, Drying First Circuit Cyclone", for particulate matter control, and **a** heat recovery system and wet ~~scrubbing~~ **scrubber** for recovering residual heat, exhausting through one (1) stack (ID Stack 10);

~~(f)~~ **(j)** one (1) drying line, identified as C102, constructed in 1996, with a maximum capacity of ~~9.13~~ **9.32** metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as "Unit 2, Drying First Circuit Cyclone", for particulate matter control, and **a** heat recovery system and wet ~~scrubbing~~ **scrubber** for recovering residual heat, exhausting through one (1) stack (ID Stack 110);

~~(g)~~ **(k)** one (1) drying line, identified as C201, constructed in 1995, with a maximum capacity of ~~9.13~~ **9.32** metric tons per hour, **with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour,** with a cyclone, identified as "Unit 1, Drying Second Circuit Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 11);

~~(h)~~ **(l)** one (1) drying line, identified as C202, constructed in 1996, with a maximum capacity of ~~9.13~~ **9.32** metric tons per hour, **with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour,** with a cyclone, identified as "Unit 2, Drying Second Circuit Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 111);

(m) one (1) drying line, identified as C103, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as "Unit 3, Drying First Circuit Cyclone", for particulate matter control, and a heat recovery system and wet scrubber for recovering residual heat, exhausting through one (1) stack (ID Stack 210);

(n) one (1) drying line, identified as C104, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as "Unit 4, Drying First Circuit Cyclone", for particulate matter control, and a heat recovery system and wet scrubber for recovering residual heat, exhausting through one (1) stack (ID Stack 310);

(o) one (1) drying line, identified as C203, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour, with a cyclone, identified as "Unit 3, Drying Second Circuit Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 211);

(p) one (1) drying line, identified as C204, with a maximum capacity of 9.32 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 9 MMBtu per hour, with a cyclone, identified as "Unit 4, Drying Second Circuit Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 311);

~~(i)~~ **(q)** one (1) flour cooler, identified as FC1, constructed in 1995, with a maximum capacity of ~~9.13~~ **9.32** metric tons per hour, with a cyclone, identified as "Flour Cooler Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 12);

~~(j)~~ **(r)** one (1) flour cooler, identified as FC2, constructed 1996, with a maximum capacity of ~~9.13~~ **9.32** metric tons per hour, with a cyclone, identified as "Flour Cooler Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 112);

(s) one (1) flour cooler, identified as FC3, with a maximum capacity of 9.32 metric tons per hour, with a cyclone, identified as "Flour Cooler Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 212);

(t) one (1) flour cooler, identified as FC4, with a maximum capacity of 9.32 metric tons per hour, with a cyclone, identified as "Flour Cooler Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 312);

~~(k)~~ **(u)** one (1) flour sifter system, identified as FS1, constructed in 1995, with a maximum capacity of ~~9.13~~ **9.32** metric tons per hour, using a baghouse (ID B3) for particulate matter control, exhausting through one (1) stack (ID Stack 13);

~~(l)~~ **(v)** one (1) flour sifter system, identified as FS2, constructed in 1996, with a maximum capacity of ~~9.13~~ **9.32** metric tons per hour, using a baghouse (ID B4) for particulate matter control, exhausting through one (1) stack (ID Stack 113);

(w) one (1) flour sifter system, identified as FS3, with a maximum capacity of 9.32 metric tons per hour, with three (3) separate steps, each using a baghouse for particulate matter control, exhausting through three (3) stacks (ID Stack 254, 255, & 256);

(x) one (1) flour sifter system, identified as FS4, with a maximum capacity of 9.32 metric tons per hour, with three (3) separate steps, each using a baghouse for particulate matter control, exhausting through three (3) stacks (ID Stack 354, 355, & 356);

~~(m)~~ **(y)** one (1) milled and dried flour unit, identified as MDF1, constructed in 1995, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B5) for particulate matter control, exhausting through one (1) stack (ID Stack 14);

~~(n)~~ **(z)** one (1) milled and dried flour unit, identified as MDF2, constructed in 1996, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B6) for particulate matter control, exhausting through one (1) stack (ID Stack 114);

(aa) one (1) milled and dried flour unit, identified as MDF3, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B) for particulate matter control, exhausting through one (1) stack (ID Stack 214);

(bb) one (1) milled and dried flour unit, identified as MDF4, with a maximum capacity of 9.32 metric tons per hour, using a baghouse (ID B) for particulate matter control, exhausting through one (1) stack (ID Stack 314);

~~(o)~~ **(cc)** one (1) corn skin separator, identified as CSS1, constructed in 1995, with a maximum capacity of 0.647 ton per hour, using a baghouse (ID B8) for particulate matter control, exhausting through one (1) stack (ID Stack 40);

~~(p)~~ **(dd)** one (1) pair of corn skin separators, identified as CSS2N and CSS2S, constructed in 1996, each with a maximum capacity of 0.323 ton per hour, each using a baghouse (ID B9N and B9S, respectively) for particulate matter control, each exhausting through one (1) stack (ID Stacks 140N and 140S, respectively);

(ee) one (1) pair of corn skin separator, identified as CSS3N and CSS3S, each with a maximum capacity of 0.647 ton per hour, each using a baghouse (IDs BN and BS respectively) for particulate matter control, exhausting through one stack (IDs Stack 240N and 240S respectively);

(ff) one (1) pair of corn skin separators, identified as CSS4N and CSS4S, each with a maximum capacity of 0.323 ton per hour, each using a baghouse (ID BN and BS, respectively) for particulate matter control, each exhausting through one (1) stack (ID Stacks 340N and 340S, respectively).

~~(q)~~ **(gg)** one (1) corn skin storage system, constructed in 1995, with a maximum capacity of 1.294 metric tons per hour, using a baghouse (ID B9) for PM control, exhausting through one (1) stack (ID Stack 15); ~~and~~

~~(r)~~ **(hh)** one (1) rail loading system, constructed in 1995, with a maximum capacity of 21.77 metric tons per hour, with a three way valve leading to three flexible lines, using a pneumatic filtering device (ID B10) for particulate matter control, exhausting indoors (ID Stack 49);

~~(s)~~ **(ii)** one (1) truck loading system, constructed in 2002, sharing a pneumatic filtering device with the rail loading system for particulate matter control, exhausting indoors~~.~~ **; and**

(jj) six (6) natural gas fired grain dryers, identified as GD-1, GD-2, GD-3, GD-4, GD-5 and GD-6, each with a maximum heat input rate of 16.80 mm Btu per hour.

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

~~D.2.1 New Source Performance Standard for Grain Elevators [326 IAC 12] [40 CFR 60.300 - 60.304, Subpart DD]~~

~~Pursuant to 40 CFR 60.302, the following shall apply:~~

~~(a) The particulate matter emissions from the corn screeners, both of which exhaust through baghouse B1, shall not exceed 0.01 grains per dry standard cubic foot (gr/dscf). This is equivalent to a particulate matter emission rate of 0.26 pounds per hour at an exhaust flow rate of 3,000 acfm.~~

~~(b) The visible emissions from the corn screeners shall not exhibit greater than 0 percent opacity.~~

~~(c) The particulate matter emissions from the corn skin storage system, which exhausts through baghouse B9, shall not exceed 0.01 grains per dry standard cubic foot (gr/dscf). This is equivalent to a particulate matter emission rate of 0.34 pounds per hour at an exhaust flow rate of 4,000 acfm.~~

~~(d) The visible emissions from the corn skin storage system shall not exhibit greater than 0 percent opacity.~~

~~(e) The fugitive emissions from the railcar unloading station shall not exhibit greater than 5 percent opacity.~~

D.2.2~~.~~ **1** Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a)(Non-attainment Area Particulate Limitations), particulate matter (PM) emissions from the facilities listed below shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf). The equivalent pound per hour emission rates are calculated as follows:

Facility ID	Stack ID	Air Flow Rate (acfm)	326 IAC 6-1-2 allowable PM emission rate (lb/hr)
Corn Receiving & Screening	6	3000.00	0.77
Lime Bin System	9	149	0.04
C101 Drying Line	10	45000	11.57
C201 Drying Line	11	35000	9.0
C102 Drying Line	110	45000	11.57
C202 Drying Line	111	35000	9.0
Flour Cooler FC1	12	12000	3.09
Facility ID	Stack ID	Air Flow Rate (acfm)	326 IAC 6-1-2 allowable PM emission rate (lb/hr)
Flour Cooler FC2	112	12000	3.09
Flour Sifter System FS1	13	366	0.09
Flour Sifter System FS2	113	366	0.09
Milled & Dried Flour Unit MDF1	14	1450	0.37
Milled & Dried Flour Unit MDF2	114	1450	0.37
Corn Skin Separator CSS1	40	6518	1.68

Corn Skin Separator CSS2N	140N	6518	1.68
Corn Skin Separator CSS2S	140S	6518	1.68
Corn Skin Storage System	15	4000	1.03
Rail Loading System	49	1396	0.36
C103 Drying Line	**210**	**45000.00**	**11.57**
C104 Drying Line	**310**	**45000.00**	**11.57**
C203 Drying Line	**211**	**35000.00**	**9.00**
C204 Drying Line	**311**	**35000.00**	**9.00**
Corn Skin Separator CSS3N	**240N**	**4000.00**	**1.03**
Corn Skin Separator CSS3S	**240S**	**4000.00**	**1.03**
Corn Skin Separator CSS4N	**340N**	**4000.00**	**1.03**
Corn Skin Separator CSS4S	**340S**	**4000.00**	**1.03**
Flour Sifter System FS3 (Step1)	**254**	**1300.00**	**0.33**
Flour Sifter System FS3 (Step2)	**255**	**8800.00**	**2.26**
Flour Sifter System FS3 (Step3)	**256**	**8900.00**	**2.29**
Flour Sifter System FS4 (Step1)	**354**	**360.00**	**0.09**
Flour Sifter System FS4 (Step2)	**355**	**8900.00**	**2.29**
Flour Sifter System FS4 (Step3)	**356**	**8800.00**	**2.26**
Grain Receiving Pit A Hood	**1**	**3000.00**	**0.77**
Grain Receiving Pit B Hood	**101**	**3000.00**	**0.77**
Grain Receiving Pit D Hood	**51**	**10000.00**	**2.57**
Grain Receiving Pit A Scalper	**2**	**10000.00**	**2.57**
Grain Receiving Pit B Scalper	**102**	**10000.00**	**2.57**

Facility ID	Stack ID	Air Flow Rate (acfm)	326 IAC 6-1-2 allowable PM emission rate (lb/hr)
Grain Receiving Pit C Scalper	**106**	**8500.00**	**2.19**
Grain Receiving Pit D Scalper	**52**	**10000.00**	**2.57**
Lime Hopper System	**209**	**521.00**	**0.13**
Milled & Dried Flour Unit MDF3	**214**	**1200.00**	**0.31**
Milled & Dried Flour Unit MDF4	**314**	**1450.00**	**0.37**

Rework Mill Cooling Fan I	**253**	**4000.00**	**1.03**
Rework Mill Cooling Fan II	**353**	**4000.00**	**1.03**
Flour Cooler FC3	**212**	**12000.00**	**3.09**
Flour Cooler FC4	**312**	**12000.00**	**3.09**

D.2.~~3~~ **2** 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 these facilities and their control devices.

Compliance Determination Requirements

D.2.~~4~~ **3** Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) During the period between 12 and 18 months after issuance of this permit, in order to demonstrate compliance with Condition D.2.2, the Permittee shall perform PM testing on baghouse B1 (Stack 6), the Unit 1, Drying First Circuit Cyclone (Stack 10), the Unit 1, Drying Second Circuit Cyclone (Stack 11), the Flour Cooler Cyclone (Stack 12), baghouse B8 (Stack 40), and baghouse B9 (Stack 15), utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

(b) During the period within 180 days after start-up upon achieving the increased production rate, in order to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM testing on the baghouse 1 (Stack 1), the Unit 3, Drying First Circuit Cyclone (Stack 210), the Unit 3, Drying Second Circuit Cyclone (Stack 211), the Flour Cooler Cyclone (Stack 212) and the baghouse BN (Stack 240N), utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

D.2.~~5~~ **4** Particulate Matter (PM)

(a) Pursuant to CP-163-4433-00107, issued on June 30, 1995, and in order to comply with Condition D.2.~~2~~ **1:**~~,~~

(1) the baghouses for PM control shall be in operation and control emissions from the corn receiving pit, the corn screeners, the lime bin system, the two (2) flour sifter systems, the two (2) milled and dried flour units, the three (3) corn skin separators, and the corn skin storage system at all times that these facilities are in operation.

~~(b)~~ **(2)** The cyclones shall be in operation and control emissions from the four (4) drying lines and the two (2) flour coolers at all times that these facilities are in operation.

~~(c)~~ **(3)** The cartridge filter shall be in operation and control emissions from the rail loading system at all times that the rail loading system is in operation.

(b) In order to comply with Condition D.2.1:

(1) the baghouses for PM control shall be in operation and control emissions from the three (3) grain receiving pit hoods, A, B, and D, four (4) grain receiving pit scalpers, A, B, C and D, one (1) lime bin system, two (2) milled and dried flour units, MDF3 and MDF4, two (2) flour sifter systems, FS3 and

FS4, two (2) rework mill cooling fans and four (4) corn skin separators, CSS3N, CSS3S, CSS3N and CSS4S at all times that these facilities are in operation.

(2) The cyclones shall be in operation and control emissions from the four (4) drying lines, C103, C104, C203 and C204 and the two (2) flour coolers, FC3 and FC4 at all times that these facilities are in operation.

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

D.2.~~6~~ **5** Visible Emissions Notations

(a) Visible emission notations of each of the ~~baghouse stacks identified as Stacks 6 and 15 and each of the~~ cyclone stacks identified as Stacks 10**,** ~~and~~ 110**, 210 and 310** shall be performed once per shift 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 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 deviation from this permit.**

D.2.~~7~~ **6** Parametric Monitoring

~~(a) The Permittee shall record the total static pressure drop across each of the baghouses (ID B1 and B9) used in conjunction with the corn receiving and screening and the corn skin storage system, at least once per shift when the corn receiving and screening and the corn skin storage system are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each of the baghouses shall be maintained within the range of 1.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C-Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(b) The Permittee shall record the total static pressure drop across each of the cyclones (ID Unit 1 Drying 1st Cyclone, and Unit 2 Drying 1st Cyclone) used in conjunction with the C101 and C102 Drying lines, at least once per shift when the C101 and C102 Drying lines are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each of the cyclones shall be maintained within the range of 1.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~

~~The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.~~

The Permittee shall record the total static pressure drop across each of the cyclones (ID Unit 1 Drying 1st Circuit Cyclone, Unit 2 Drying 1st Circuit Cyclone, Unit 3 Drying 1st Circuit Cyclone and Unit 4 Drying 1st Circuit Cyclone) used in conjunction with the C101, C102, C103 and C104 lines, at least once per shift when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the Unit 1 Drying 1st Circuit Cyclone and Unit 2 Drying 1st Circuit Cyclone is outside the normal range of 6.0 and 13.0 inches of water or a range established during the latest stack test and the pressure drop across the Unit 3 Drying 1st Circuit Cyclone and Unit 4 Drying 1st Circuit Cyclone is outside the normal range of 4.0 and 8.0 inches of water or a range established during the latest stack test the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

~~D.2.8 Baghouse Inspections~~

~~An inspection shall be performed each calendar quarter of all bags controlling the corn receiving and screening and the corn skin storage system when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.~~

D.2.~~9~~ **7** Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the C101**,** ~~and~~ C102**, C103 and C104** Drying Lines when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. **Inspections required by this condition shall not be performed in consecutive months.**

~~D.2.10 Broken or Failed Bag Detection~~

~~In the event that bag failure has been observed:~~

~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B - Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may~~

~~continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

D.2.~~11~~ **8**Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). **Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.**

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

D.2.~~12~~ **9**Record Keeping Requirements

(a) To document compliance with Condition D.2.~~6~~ **5**, the Permittee shall maintain records of visible emission notations of ~~the baghouse stack exhausts identified as Stacks 6 and 15 and~~ each of the cyclone stack exhausts identified as Stacks 10**,** ~~and~~ 110**, 210 and 310** once per shift.

(b) To document compliance with Condition D.2.~~7~~ **6**, the Permittee shall maintain the following for each cyclone:

(1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

(2) Documentation of the dates vents are redirected.

(c) To document compliance with Condition~~s~~ D.2.~~8~~ **7** ~~and D.2.9~~, the Permittee shall maintain records of the results of the inspections required under Condition~~s~~ D.2.~~8~~ **7** ~~and D.2.9~~ and the dates the vents are redirected.

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

SECTION D.3 FACILITY OPERATION CONDITIONS

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

Insignificant Activities

(a) Other categories with PM emissions below insignificant thresholds:

(1) twenty-four (24) flour storage bins, each with one (1) baghouse for PM emissions control, each exhausting through one stack (ID Stacks 16 through 39). [326 IAC 6-1-2]

(2) twenty-four (24) flour storage bins, each with one (1) baghouse for PM, each exhausting through one stack (ID Stacks 55 through 78); [326 IAC 6-1-2]

~~(2)~~ **(3)** a pneumatic conveying system for collection of flour from storage bins, with six (6) baghouses for PM emissions control, exhausting through six (6) stacks (ID Stacks 43 through 48), respectively . [326 IAC 6-1-2]

(4) a pneumatic conveying system for collection of flour from storage bins, with two (2) baghouses for PM emissions control, exhausting through two (2) stacks (ID Stacks 251 and 252); [326 IAC 6-1-2]

~~(3)~~ **(5)** two (2) rework bins, each with one (1) baghouse for PM emissions control, each exhausting through one (1) stack (ID Stacks 41 and 42). [326 IAC 6-1-2]

(6) two (2) rework bins, each with one (1) baghouse for PM emissions control, each exhausting through one (1) stack (ID Stacks 241 and 242); [326 IAC 6-1-2]

~~(4)~~ **(7)** one (1) ingredients hopper, with one (1) baghouse for PM emissions control exhausting through one (1) stack (ID Stack 53). [326 IAC 6-1-2]

~~(5)~~ **(8)** two (2) packaging machines, with one (1) baghouse for PM emissions control, exhausting through one (1) stack (ID Stack 50). [326 IAC 6-1-2]

~~(6)~~ **(9)** sack dumping, exhausting indoors through one (1) stack (ID Stack 54). [326 IAC 6-1-2]

~~(7)~~ **(10)** two (2) lime hoppers, each with a maximum throughput capacity of 8.3 metric tons per hour, each exhausting through one (1) stack (ID Stacks 8 and 108). [326 IAC 6-1-2]

(11) two (2) lime hoppers, each with a maximum throughput capacity of 8.3 metric tons per hour, each exhausting through one (1) stack (ID Stacks 208 and 308); [326 IAC 6-1-2]

~~(8)~~ **(12)** one (1) 6.0 million Btu per hour natural gas fired wet cake dryer, with an airflow rate of 4226 dry standard cubic feet per minute (dscf/min); [326 IAC 6-1-2]

(13) one (1) 6.0 million Btu per hour natural gas fired wet cake dryer, with an airflow rate of 4226 dry standard cubic feet per minute (dscf/min). [326 IAC 6-1-2]

(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 6-1-2]

Pursuant to 326 IAC 6-1-2(a)(Non-attainment Area Particulate Limitations), particulate matter (PM) emissions from each of the facilities listed above shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

Compliance Determination Requirements

D.3.2 Particulate Matter (PM)

The baghouses for PM control shall be in operation and control emissions from the ~~twenty-four (24)~~ **forty-eight (48)** flour storage bins, the **two (2)** pneumatic conveying system**s**, the ~~two (2)~~ **four (4)** rework bins, the ingredients hopper, the two (2) packaging machines, the sack dumping operation, and the ~~two (2)~~ **four (4)** lime hoppers at all times that these facilities are in operation.

Note: The natural gas boiler certification form was removed because it is not required for boilers only burning natural gas.

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

PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Azteca Milling, L.P.
Source Address: 15700 Highway 41 North, Evansville, Indiana 47711
Mailing Address: P.O. Box 23550, Evansville, Indiana 47724
Part 70 Permit No.: T163-7995-00107

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

Report period
Beginning: _____
Ending: _____

Boiler Affected	Alternate Fuel		Days burning alternate fuel
	From	To	

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:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is not required for this report.

Condition C.17 has been revised as follows:

C.17 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 April 15 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:~~

Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of **all** ~~criteria~~ pollutants **listed in 326 IAC 2-6-4(a)** ~~from the source, in compliance with 326 IAC 2-6 (Emission Reporting)~~;

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 **(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule")** from the source, for purpose~~s~~ of ~~Part 70~~ fee assessment.

The statement must be submitted to:

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. 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

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

(~~c~~ **b**) 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.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document (TSD) for a Significant Permit Modification

Source Name:	**Azteca Milling, L.P.**
Source Location:	**15700 Highway 41 North, Evansville, Indiana 47711**
County:	**Vanderburgh**
SIC Code:	**2046**
Operation Permit No.:	**T163-7995-00107**
Operation Permit Issuance Date:	**February 28, 2001**
Significant Source Modification No.:	**163-18534-00107**
Significant Permit Modification No.:	**163-18652-00107**
Permit Reviewer:	**Seema Roy/EVP**

On August 5, 2004, the Office of Air Quality (OAQ) had a notice published in “The Evansville Courier” in Evansville, Indiana, stating that Azteca Milling, L.P. has applied to construct and operate new equipment associated with the corn milling process and to double the maximum corn flour production rate from 160,000 metric tons per year to 320,000 metric tons per year. The notice also stated that OAQ proposed to issue a Significant Permit Modification for this operation and provided information on how the public could review the proposed Significant Permit Modification 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 Significant Permit Modification should be issued as proposed.

On August 23, 2004, Leslie Sams Forest of Air Quality Services, LLC submitted comments on behalf of Azteca Milling, L.P. on the proposed Significant Permit Modification. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

In the cover letter with the draft permit, items (e) through (n) say: "with a maximum capacity of 9.13 metric tons per hour". It should say "with a maximum capacity of 9.32 metric tons per hour". It seems to be correct throughout the rest of the permit.

Response 1

The maximum capacity has been changed from 9.13 metric tons per hour to 9.32 metric tons per hour throughout the cover letter.

Comment 2

In the equipment list in Section A.2 the following changes should be made:

(b) ID stack 302 needs to be 307.

(c) After "constructed in 1995" add "exhausting through stack (ID 1)" also need to change ID Stack 6 to ID Stack 51.

(d) Change ID Stack 51 to ID Stack 206.

(f) "each with a maximum capacity of 30 metric tons per hour" change this phrase to "one with a maximum capacity of 30 metric tons per hour and other one with a maximum capacity of 100 metric tons per hour"

*(hh) (ID Stack 49) is not in the calculations list nor in the flow diagram of the application. Where did this ID come from?

(jj) Still need to add in the associated Stack IDs (5, 4, 3, 105, 104, 103)

*Need to add a line; example line item (kk) to include: "rework mill cooling fan ID stack 253" and "rework mill Cooling fan ID 353" - they do appear in the calculation section of the application but are not mentioned on this list.

Response 2

ID Stack 49 is included in the existing Part 70 Permit No. T163-7995-00107. Section A.2 has been revised as follows:

(b) two (2) natural gas-fired steam boilers, identified as, Unit 3 Boiler and Unit 4 Boiler, each rated at 10.46 million (MM) British thermal units (Btu) per hour, each exhausting through separate stacks (ID Stacks 207 and ~~302~~ **307**), respectively;

(c) one (1) corn receiving pit, identified as Corn Receiving Pit C, constructed in 1995, **exhausting through stack (ID Stack 1),** located in an enclosed building, with a maximum capacity of 203 metric tons per hour, equipped with a grain scalper to remove foreign material from the corn, with a baghouse (ID B1) for particulate matter control, exhausting through one (1) stack (ID Stack ~~6~~ **51**);

(d) three (3) corn receiving pits with hoods , identified as Corn Receiving Pit A, B, and D, each with a maximum capacity of 203 metric tons per hour, each with a baghouse (ID 1, 101, and 51), exhausting through stacks (ID Stacks 1, 101 and ~~51~~ **206**), each equipped with a grain scalper (A, B, & D) to remove foreign material from the corn, each scalper with a baghouse (ID 2, 102, and 52) for particulate matter control, each exhausting through its own stack (ID Stacks 2, 102 and 52);

(e) one (1) Grain receiving pit scalper C, associated with existing Grain receiving Pit C, with a baghouse (ID 106) for particulate matter control, exhausting through one (1) stack (ID Stack 106);

(f) two (2) corn screeners, identified as Unit 1 Screener and Unit 2 Screener, constructed in 1995 and 1996 respectively, ~~each~~ **one** with a maximum capacity of 30 metric tons per hour **and the other one with a maximum capacity of 100 metric tons per hour**, with a baghouse (ID B1) for particulate matter control, exhausting through one (1) stack (ID Stack 6);

(jj) six (6) natural gas fired grain dryers, identified as GD-1, GD-2, GD-3, GD-4, GD-5 and GD-6, each with a maximum heat input rate of 16.80 mm Btu per hour**, each exhausting through separate stacks (ID Stacks 5, 4, 3, 105, 104 and 103), respectively**.

(kk) two (2) rework mill cooling fans, each exhausting through separate stacks (ID Stacks 253 and 353), respectively.

The above changes have also been made to Section D.2 of the permit.

Comment 3

In Section A.3 the following changes should be made:

(12) Include ID Stack 80

(13) Include ID Stack 180

Two (2) packaging machines need to be added to the equipment list in the insignificant activities list. Both were on the Emissions Inventory and the Particulate Control Equipment list in the permit application, but were inadvertently not included in the insignificant section in the application. The ID's for these stacks are 257 and 258. Attached are the associated Q-1 forms for these machines.

Response 3

Section A.3 has been revised as follows:

(a) (8) two (2) packaging machines, with one (1) baghouse for PM emissions control, exhausting through one (1) stack (ID Stack 50). [326 IAC 6-1-2]

(9) two (2) packaging machines, with two (2) baghouses for PM emissions control, exhausting through two (2) stacks (ID Stacks 253 and 353) respectively. [326 IAC 6-1-2]

(~~9~~ **10**) sack dumping, exhausting indoors through one (1) stack (ID Stack 54). [326 IAC 6-1-2]

(~~10~~ **11**) two (2) lime hoppers, each with a maximum throughput capacity of 8.3 metric tons per hour, each exhausting through one (1) stack (ID Stacks 8 and 108). [326 IAC 6-1-2]

(~~11~~ **12**) two (2) lime hoppers, each with a maximum throughput capacity of 8.3 metric tons per hour, each exhausting through one (1) stack (ID Stacks 208 and 308); [326 IAC 6-1-2]

(~~12~~ **13**) one (1) 6.0 million Btu per hour natural gas fired wet cake dryer, with an airflow rate of 4226 dry standard cubic feet per minute (dscf/min)**, exhausting through stack (ID Stack 80)**; [326 IAC 6-1-2]

(~~13~~ **14)** one (1) 6.0 million Btu per hour natural gas fired wet cake dryer, with an airflow rate of 4226 dry standard cubic feet per minute (dscf/min)**, exhausting through stack (ID Stack 180)**. [326 IAC 6-1-2]

Comment 4

In Section D.2.1, include in the table Grain Receiving Pit C Hood ID Stack 51.

Response 4

Grain Receiving Pit C Hood ID Stack 51 has been added in the table under Section D.2.1.

Comment 5

It is our opinion that the differential pressure on cyclones and opacity on cyclone stacks are not an indication of failure of the emission control performed by those devices. As was mentioned in the permit application the readings are higher than the 6" water column limit stated on the permit (from 9 to 12" depending of the cyclone). However those "high readings" were also present on days Azteca performed and passed the emissions testing, twice. They are, however, being monitored daily, as required, with much trouble because the differential pressure nozzles inserted on the cyclone walls are so prone to plug with flour particles and moisture. The gauges do not indicate when these are plugged. The operator (usually a manager) has to put on his lycra suit to climb to the cyclone top (no catwalk nor platform in there) and clear the plug using a welding rod to be able to take the required daily reading. It is a danger to employees to continue doing these readings, and would be more so if IDEM were to require an increase of their frequency. If this is still required, Azteca will have to invest in catwalks and ladders, which would still be dangerous during inclement weather, to improve access to these gauges.

Response 5

OAQ agrees that recording differential pressure on cyclones is not necessary. Condition D.2.6 has been removed from the permit as follows:

~~D.2.6 Parametric Monitoring~~

~~The Permittee shall record the total static pressure drop across each of the cyclones (ID Unit 1 Drying 1st Circuit Cyclone, Unit 2 Drying 1st Circuit Cyclone, Unit 3 Drying 1st Circuit Cyclone and Unit 4 Drying 1st Circuit Cyclone) used in conjunction with the C101, C102, C103 and C104 lines, at least once per shift when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the Unit 1 Drying 1st Circuit Cyclone and Unit 2 Drying 1st Circuit Cyclone is outside the normal range of 6.0 and 13.0 inches of water or a range established during the latest stack test and the pressure drop across the Unit 3 Drying 1st Circuit Cyclone and Unit 4 Drying 1st Circuit Cyclone is outside the normal range of 4.0 and 8.0 inches of water or a range established during the latest stack test the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.~~

~~The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.~~

However, the source will still be required to perform visible emission notations as required in condition D.2.5 (Visible Emissions Notations) and perform external inspections as required in condition D.2.6 because compliance monitoring conditions are in the permit in order to ensure continuous compliance with the requirements. Emission unit failure can occur suddenly; therefore monitoring of emission unit operational parameters should be more frequently than weekly or even daily in such cases where a source operates more than one shift per day. The OAQ believes that visible emissions notations once per operating shift and quarterly inspections are reasonable requirements.

The safety of the employee responsible for doing Visible Emissions Notations is Azteca Milling, L.P.'s responsibility. The source must find better ways (like building a catwalk or platform, etc.) to reach the cyclone top in a manner that is not dangerous for the employees.

Comment 6

Azteca also requests that the visible notations of the boilers (Section D.1) be removed from the requirements of this permit. The boilers are operated only using natural gas. Because of the nature of natural gas combustion, visible emissions checks are not needed.

Response 6

OAQ agrees with the request and Condition D.1.4 has been removed from the Part 70 Permit as follows:

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

~~D.1.4 Visible Emissions Notations~~

~~(a) Visible emission notations of the Unit 1 Boiler, Unit 2 Boiler, Unit 3 Boiler and Unit 4 Boiler stack exhaust shall be performed once per shift 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 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 deviation from this permit.~~

Upon further review, the OAQ has decided to make the following changes to the Significant Source Modification. Bolded language has been added and the language with a line through it has been deleted.

Although the TSD itself will not be revised, as it is a historical document, the following is being provided to show how the major source status has been affected as a result of the 8-hour ozone standard designations.

On April 15, 2004, the United Stated Environment Protection Agency (USEPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004, with Vanderburgh County being designated as nonattainment for the 8-hour ozone standard. As a result of this the major source status of the source has changed as follows:

Nonattainment New Source Review (NSR)

This existing source is located in Vanderburgh County, which was redesignated on June 15, 2004 as a basic nonattainment area for the 8-hour ozone standard. Upon this redesignation, the source became a major source because it has a potential to emit NO_x at greater than the nonattainment NSR applicability threshold of 100 tons per year. As such, any modification made to this source after June 15, 2004 shall be reviewed pursuant to the requirements of nonattainment NSR.

The Potential to Emit (PTE) of Modification after Issuance table is as follows:

	Potential to Emit (PTE) of Modification After Issuance (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Boilers 3 and 4	0.18	0.70	0.06	0.50	7.7	9.16	negl.
Grain Dryers GD1-GD6	0.84	3.36	0.24	2.4	37.08	44.16	negl.
Cake dryer	0.05	0.20	0.02	0.14	2.21	2.63	negl.
2nd Circuit Drying Lines C201 and C202*	0.14	0.60	0.04	0.44	6.62	7.88	negl.
3rd Circuit Drying Lines C103 and C104**	88.15	89.05	0.10	5.06*****	13.24	15.76	negl.
4th Circuit Drying Lines C203 and C204***	71.10	71.56	0.04	0.44	6.62	7.88	negl.
Corn Skin Separators	2.10	2.10	0.00	0.00	0.00	0.00	0.00
Flour Sifter Systems	19.48	19.48	0.00	0.00	0.00	0.00	0.00
Grain Receiving Pit Hoods A, B and D	6.01	6.01	0.00	0.00	0.00	0.00	0.00
Grain Receiving Pit Scalpers A, B, C and D	14.45	14.45	0.00	0.00	0.00	0.00	0.00
Lime Hopper System	0.17	0.17	0.00	0.00	0.00	0.00	0.00
Milled and Dried Flour Units	0.85	0.85	0.00	0.00	0.00	0.00	0.00
Rework Mill Cooling Fans	3.00	3.00	0.00	0.00	0.00	0.00	0.00
Flour Coolers	25.23	25.23	0.00	0.00	0.00	0.00	0.00
Total PTE of Modification ****	231.75	236.76	0.52	8.98	73.48	87.48	1.6
PSD Threshold	250	250	250	250	250	250	N/A
Nonattainment NSR Threshold	**N/A**	**N/A**	**N/A**	**100**	**N/A**	**100**	**N/A**

On September 7, 2004, Charles L. Berger of Berger and Berger submitted comments on behalf of the United Association of Plumbers and Steamfitters, Local Union No. 136 in Evansville, Indiana on the proposed Significant Source Modification. The summary of the comments and corresponding responses is as follows:

Comment 1

We are offering comments on behalf of the United Association of Plumbers and Steamfitters, Local Union No. 136 in Evansville, Indiana in the above referenced matter. The Plumbers and Steamfitters, Local 136 represents construction workers and their families who are employed in the construction trades performing work within their jurisdiction in the geographical area of Southwestern Indiana. These individuals perform plumbing, pipefitting and other mechanical work in conjunction with construction work including the type of work necessary to construct and install the equipment and facilities necessary for the corn milling process and to make the changes requested in the above referenced request for permits from Azteca Milling, LP, which is located in Vanderburgh County, Indiana. The members of the Union are interested in maintaining a sustainable economy and sustainable economic development that can only be done when sound environmental policies and practices are followed. The proposed permit will provide for environmental degradation in the Vanderburgh County area which may jeopardize future jobs by adding to the non-attainment status of the air quality in this area and making the environment less desirable to live and derive an income in this area and more importantly creating a less favorable environmental condition to allow for future economic growth and development in the Vanderburgh County region. The continued degradation of air quality can and has caused new construction obstacles and other restriction on growth which have reduced future employment opportunities for citizens in this State by reason of the failure of applicants to make environmentally sound proposals in their permit application process.

The individuals and their families that are represented by Plumbers and Steamfitters, Local 136 work in this community and will suffer the impact of detrimental projects that harm the environment. All citizens, including the members of our client, breathe the same polluted air and suffer the same health and safety impacts as all other citizens in Southern Indiana. The Plumbers and Steamfitters, Local 136 and its members have significant interest in requiring the enforcement of the environmental laws of our State to protect its members as well as all other workers and citizens who are both employed and live in Vanderburgh County. This project should receive very close scrutiny. When a project such as this will cause environmental harm without providing the counter-veiling economic benefits for decent wages and benefits without further degradation of the environment in this area then such a project should not be allowed. The comments offered set out the significant deviations that are contained in the draft permit and application of Azteca Milling, LP from the actual impact that will occur if the permit is granted in its present form.

The modifications sought and the permits applied for by Azteca Milling, LP under the proposed operating permit will provide for equipment that will not limit emission to an acceptable level and further do not require the best available control technology on all of the equipment to be installed. The amount of emissions for the bag house will present significant environmental contamination in the region and will further jeopardize the air quality of Southwestern Indiana. The bag house specifications in the permit do not provide for the best available control technology on the limitations of the emissions of particulate matter, which will pose a significant environmental hazard and potential risk to the community. The application as sought should require the best available control technology on all of the equipment to installed and modified. The application in its current form should be rejected.

Response 1

IDEM is proposing to approve the Significant Source Modification requested by Azteca Milling, L.P. based on the fact that the information provided in the source's modification application indicates that the operation of the proposed modification will meet all the requirements of applicable state and federal rules. These rules were established by the state of Indiana and U.S. EPA under the various programs of the Clean Air Act and the Indiana Code. The source has agreed to limit their emissions below the allowable emissions under 326 IAC 6-1-2 (Non-attainment Area Particulate Limitations) and 326 IAC 2-2 (PSD) for all the equipment. Also, based on the state and federal rules that are applicable to the emissions units proposed in the modification request, none of the emission units at the source are subject to the requirements of Best Available Control Technology (326 IAC 8-1-6). However, the source is required to perform monitoring of the baghouses and the cyclones to monitor whether it is in compliance with the 326 IAC 6-1-2 limits or not. Different agencies in the State of Indiana have different areas of jurisdiction. IDEM, OAQ is responsible for the issuance or denial of Title V permits, but has no jurisdiction over unemployment problems and the health issues brought up by the United Association of Plumbers and Steamfitters, Local Union No. 136. The health issues brought up Berger and Berger are related to OSHA issues and regulations, over which the OAQ has no jurisdiction, and have no bearing on the issuance of Title V permits. However, IDEM can help concerned residents get in touch with the agency in charge of OSHA issues and obtain responses to the open cases. No changes have been made to the permit as a result of this comment.

Appendix A: Process Particulate Emissions

Company Name: Azteca Milling, L.P.
Address City IN Zip: 15700 Highway 41 North, Evansville, Indiana 47711
Operation Permit No.: 163-7995-00107
Significant Source Modification No.: 163-18534-00107
Significant Permit Modification No.: 163-18652-00107
Reviewer: Seema Roy

State Potential Emissions (tons/year)

Stack ID	Control Device ID No.	Emission Unit ID	Grain Loading per Actual Cubic Foot of Outlet Air	Air Flow Rate (acfm)	Control Efficiency	Total (lbs/hr)	Total (tons/yr)	326 IAC 6-1-2 Allowable PM Emissions (lb/hr)
210	Unit 3 Drying 1st Cyclone	C103 Drying Line	0.02600	45000.00	99.94%	10.03	43.93	11.57
310	Unit 4 Drying 1st Cyclone	C103 Drying Line	0.02600	45000.00	99.94%	10.03	43.93	11.57
211	Unit 3 Drying 2nd Cyclone	C203 Drying Line	0.02700	35000.00	99.94%	8.10	35.48	9.00
311	Unit 4 Drying 2nd Cyclone	C203 Drying Line	0.02700	35000.00	99.94%	8.10	35.48	9.00
240N	Baghouse BN	Corn Skin Separator CSS3N	0.00350	4000.00	99.99%	0.12	0.53	1.03
240S	Baghouse BS	Corn Skin Separator CSS3S	0.00350	4000.00	99.99%	0.12	0.53	1.03
340N	Baghouse BN	Corn Skin Separator CSS4N	0.00350	4000.00	99.99%	0.12	0.53	1.03
340S	Baghouse BS	Corn Skin Separator CSS4S	0.00350	4000.00	99.99%	0.12	0.53	1.03
254	Baghouse Step 1	Flour Sifter System FS3	0.01400	1300.00	99.99%	0.16	0.68	0.33
255	Baghouse Step 2	Flour Sifter System FS3	0.01400	8800.00	99.99%	1.06	4.63	2.26
256	Baghouse Step 3	Flour Sifter System FS3	0.01400	8900.00	99.99%	1.07	4.68	2.29
354	Baghouse Step 1	Flour Sifter System FS4	0.01400	360.00	99.99%	0.04	0.19	0.09
355	Baghouse Step 2	Flour Sifter System FS4	0.01400	8900.00	99.99%	1.07	4.68	2.29
356	Baghouse Step 3	Flour Sifter System FS4	0.01400	8800.00	99.99%	1.06	4.63	2.26
1	Baghouse 1	Grain Receiving Pit A Hood	0.01000	3000.00	99.99%	0.26	1.13	0.77
101	Baghouse 101	Grain Receiving Pit B Hood	0.01000	3000.00	99.99%	0.26	1.13	0.77
51	Baghouse 51	Grain Receiving Pit D Hood	0.01000	10000.00	99.99%	0.86	3.75	2.57
2	Baghouse 2	Grain Receiving Pit A Scalper	0.01000	10000.00	99.99%	0.86	3.75	2.57
102	Baghouse 102	Grain Receiving Pit B Scalper	0.01000	10000.00	99.99%	0.86	3.75	2.57
106	Baghouse 106	Grain Receiving Pit C Scalper	0.01000	8500.00	99.99%	0.73	3.19	2.19
52	Baghouse 52	Grain Receiving Pit D Scalper	0.01000	10000.00	99.99%	0.86	3.75	2.57
209	Baghouse B2	Lime Hopper System	0.00860	521.00	99.99%	0.04	0.17	0.13
214	Baghouse B	Milled & Dried Flour Unit MDF3	0.00850	1200.00	99.99%	0.09	0.38	0.31
314	Baghouse B	Milled & Dried Flour Unit MDF4	0.00850	1450.00	99.99%	0.11	0.46	0.37
253	Baghouse	Rework Mill Cooling Fan	0.01000	4000.00	99.99%	0.34	1.50	1.03
353	Baghouse	Rework Mill Cooling Fan	0.01000	4000.00	99.99%	0.34	1.50	1.03
212	Cyclone	Flour Cooler FC3	0.02800	12000.00	99.99%	2.88	12.61	3.09
312	Cyclone	Flour Cooler FC4	0.02800	12000.00	99.99%	2.88	12.61	3.09

Total Potential Emissions (metric tons/yr): 230.09 77.85
340.9616006

Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls

Note: The baghouses and cyclones, which are part of a pneuamatic conveyance system, are used to collect and return raw material to the process. Therefore, they are considered integral to the process and are included in uncontrolled emissions.

The 326 IAC 6-1-2 allowable PM emissions are greater than the controlled emissions for each operation, therefore, all operations are in compliance with this rule.

State Potential (uncontrolled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

ESP (tons/yr) = No. Units * Loading (grains/acf) * Face Velocity (ft/sec) * Surface Area (ft²) * 1 lb/7,000 grains * 60 sec/min * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Scrubber (tons/yr) = No. Units * Loading (grains/acf) * Flow Rate (gpm) * 1/Liquid ro Air Ratio (gpm/1,000 acfm) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Federal Potential (controlled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

ESP (tons/yr) = No. Units * Loading (grains/acf) * Face Velocity (ft/sec) * Surface Area (ft²) * 1 lb/7,000 grains * 60 sec/min * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Scrubber (tons/yr) = No. Units * Loading (grains/acf) * Flow Rate (gpm) * 1/Liquid ro Air Ratio (gpm/1,000 acfm) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: Azteca Milling, L.P.
Address City IN Zip: 15700 Highway 41 North, Evansville, Indiana 47711
Operation Permit No.: 163-7995-00107
Significant Source Modification No.: 163-18534-00107
Significant Permit Modification No.: 163-18652-00107
Reviewer: Seema Roy

Emission Unit ID	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
Steam Boiler 3	10.46	91.6
Steam Boiler 4	10.46	91.6
Flour Dryer C203	9.00	78.8
Flour Dryer C204	9.00	78.8
Flour Dryer C201	9.00	78.8
Flour Dryer C202	9.00	78.8
Grain Dryer GD1	16.80	147.2
Grain Dryer GD2	16.80	147.2
Grain Dryer GD3	16.80	147.2
Grain Dryer GD4	16.80	147.2
Grain Dryer GD5	16.80	147.2
Grain Dryer GD6	16.80	147.2
Flour Dryer C103	18.00	157.7
Flour Dryer C104	18.00	157.7
Cake Dryer	6.00	52.6
	16.8	147.168

Pollutant	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Steam Boiler 3 Potential Emission in tons/yr	0.09	0.35	0.03	4.58	0.25	3.85
Steam Boiler 4 Potential Emission in tons/yr	0.09	0.35	0.03	4.58	0.25	3.85
Flour Dryer C203 Potential Emission in tons/yr	0.07	0.30	0.02	3.94	0.22	3.31
Flour Dryer C204 Potential Emission in tons/yr	0.07	0.30	0.02	3.94	0.22	3.31
Flour Dryer C201 Potential Emission in tons/yr	0.07	0.30	0.02	3.94	0.22	3.31
Flour Dryer C202 Potential Emission in tons/yr	0.07	0.30	0.02	3.94	0.22	3.31
Grain Dryer GD1 Potential Emission in tons/yr	0.14	0.56	0.04	7.36	0.40	6.18
Grain Dryer GD2 Potential Emission in tons/yr	0.14	0.56	0.04	7.36	0.40	6.18
Grain Dryer GD3 Potential Emission in tons/yr	0.14	0.56	0.04	7.36	0.40	6.18
Grain Dryer GD4 Potential Emission in tons/yr	0.14	0.56	0.04	7.36	0.40	6.18
Grain Dryer GD5 Potential Emission in tons/yr	0.14	0.56	0.04	7.36	0.40	6.18
Grain Dryer GD6 Potential Emission in tons/yr	0.14	0.56	0.04	7.36	0.40	6.18
Flour Dryer C103 Potential Emission in tons/yr	0.15	0.60	0.05	7.88	0.43	6.62
Flour Dryer C104 Potential Emission in tons/yr	0.15	0.60	0.05	7.88	0.43	6.62
Cake Dryer Potential Emission in tons/yr	0.05	0.20	0.02	2.63	0.14	2.21
Total Emissions in tons/yr	**1.66**	**6.65**	**0.52**	**87.48**	**4.81**	**73.48**

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 3 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: **Azteca Milling, L.P.**
Address City IN Zip: **15700 Highway 41 North, Evansville, Indiana 47711**
Operation Permit No.: **163-7995-00107**
Significant Source Modification No.: **163-18534-00107**
Significant Permit Modification No.: **163-18652-00107**
Reviewer: **Seema Roy**

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.782E-03	1.018E-03	6.364E-02	1.527E+00	2.885E-03

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	**Total (ton/yr)**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	4.472E-04	9.837E-04	1.252E-03	3.398E-04	1.878E-03	**1.602E+00**

Methodology is the same as page 2.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.