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May 17, 2004

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TO: Interested Parties / Applicant

RE: Indiana Packers Corporation / 015-18834-00027

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot 9/16/03

May 17, 2004

Mr. Edward Nelson
Indiana Packers Corporation
P.O. Box 318
Delphi, Indiana 46923

Re: 015-18834-00027
First Administrative Amendment to
FESOP 015-16922-00027

Dear Mr. Nelson:

Indiana Packers Corporation was issued a FESOP on August 4, 2003 for a stationary pork processing and rendering plant. A letter requesting the following changes to the FESOP was received on April 12, 2004:

- Request 1: Section D.2 – Please remove the descriptive information and conditions relating to the “existing meat cooker”. This meat cooker has been removed from operation. The Dupps meat cooker described in Section D.3 had replaced this existing meat cooker.
- Request 2: Section D.3.9 – Please remove the requirements to monitor the pH level across the stord scrubbing system (consisting of two (2) air condensers, one (1) venturi scrubber, and two (2) packed column scrubbers) at least once per shift and to take reasonable reponse steps when the pH of any of the scrubbers is above normal maximum pH level of 9.0. Monitoring the pH does not provide any useful or beneficial information regarding the operation of the venturi scrubber. The function of the venturi scrubber is not intended to control pH because the water flows directly through the unit to the packed tower scrubbers, where the pH level is appropriately monitored. Unlike the packed column scrubbers, the venturi scrubber does not contain any packing materials, nor is the control efficiency dependent upon an appropriate level of pH being maintained in the system. Rather proper operation of the venturi scrubber is dependent upon an adequate flow rate and pressure drop to cool incoming vapors and remove larger particulates. Both flow rate and pressure drop are currently required to be monitored by Condition D.3.9. Therefore, Indiana Packers Corporation requests that Condition D.3.9 be modified as follows:

D.3.9 Monitoring of Scrubber Operational Parameters

The Permittee shall monitor and record the pressure drop, flow rate and pH across the stord scrubbing system (consisting of two (2) air condensers, one (1) venturi scrubber, and two (2) packed column scrubbers) used in conjunction with the rendering process, at least once per shift when the associated rendering process is in operation when venting to the atmosphere as set forth herein. When for any one reading, the pressure drop across the venturi scrubber is outside the normal range of 1.0 and 8.0 inches of water, the pressure drop across the two (2) packed column scrubbers is outside the normal range of 3.0 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 – Implementation, Preparation, Records, and Reports. When for any one reading, the flow rate across the first stage and second stage of the stord scrubbing system (SC1) is less than the normal minimum of 25 and 70 gallons per minute, respectively; or a minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance

with Section C – Compliance Response Plan – Implementation, Preparation, Records, and Reports. When for any one reading, the pH of the two (2) packed column ~~any of the~~ scrubbers is above the normal maximum pH level of 9.0, or a pH established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Compliance Response Plan – Implementation, Preparation, Records, and Reports. A pressure reading that is outside the above mentioned range, a flow rate that is below the above mentioned minimum, or pH above the mentioned maximum is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Record, and Reports shall be considered a violation of this permit.

Request 3: Please clarify that scrubber malfunctions do not include periods when the scrubbers are operating outside of parametric ranges. Condition D.3.11 provides that in the event of a scrubber malfunction, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced unless the event satisfies the emergency provision. The permit does not define a scrubber malfunction. Therefore, IPC requests Condition D.3.9 be amended to clarify that a scrubber malfunction does not occur merely as a result of operating outside of a parametric range, but only occurs when the scrubber fails to an extent that an emission limitation is violated. The air regulations at 326 IAC 1-2-39 define “malfunction” as, “any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.” Operation of the scrubbers outside a parametric range does not constitute a failure of the scrubbers to operate in a normal and usual manner (*i.e.*, that of controlling emissions). Instead, operation outside a parametric range merely serves as a trigger for taking any response steps identified in the Compliance Response Plan (which may or may not involve shutting equipment down) that may be necessary to return the scrubbers to operation within the operational parameters set forth in its permit.

Condition D.3.6 of IPC’s permit requires the scrubber system to be in operation and to control particulate emissions from the inedible rendering process so that the applicable emission limitations are met. The emergency provision, like the malfunction rule contained in 326 IAC 1-6, applies when a violation of an emission limitation occurs. See 326 IAC 2-7-12 and 326 IAC 1-6-2. Therefore, only if the scrubber system malfunctions such that it does not control emissions as required by Condition D.3.6 should the process be required to be shut down or satisfy the emergency provisions set forth in Condition B.13. Therefore, IPC requests that Condition D.3.11 be revised as follows (underlined are additions):

D.3.11 Failure Detection

In the event that a scrubber malfunction 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 violation of this permit.

A scrubber malfunction is defined as a failure of the stored scrubbing system to control emissions from the inedible rendering process such that a violation of an emission limitation occurs. Operation of the scrubbers outside of a parametric range identified in Condition D.3.8 or D.3.9, by

itself, does not constitute a scrubber malfunction unless a violation of an emission limitation occurs.

The FESOP change qualifies as “changes to the monitoring, maintenance or record keeping requirements that is not environmentally significant” under an administrative amendment, pursuant to 326 IAC 2-8-10(a)(5). Amendment is as follows (additions are **bolded** and deletions are ~~struck through~~ for emphasis):

Response 1: Section A.2(b) and the entire Section D.2 that pertain to the existing meat cooker will be deleted from the FESOP as follows:

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

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

- (a) no change
- ~~(b) One (1) existing meat cooker used in conjunction with the inedible rendering process, a maximum process rate of 28,097 pounds of inedible meat products per hour and controlled by a stord scrubber system (identified as SC1) consisting of one (1) 7,000 cubic feet per minute (cfm) venturi scrubber, 7,000 cfm packed tower scrubber, and 60,000 cfm packed tower scrubber. This unit was constructed in 1990.~~
- (e b) Two (2) natural gas fired carcass hair singe units (identified as HS1 and HS2), rated at 12.7 MMBtu per hour each and exhausting at Stack HS1 and HS2. These units were installed in 1990.
- (d c) Three (3) smoke house operated in batch operations, each with a maximum throughput rate of 25.6 pounds of wood per hour and 5,000 pounds of pork per hour, controlled by GERMOS GmbH smoke house scrubber and exhausting to smoke vents 1, 2, and 3. These units were installed in 1990.
- (e d) One (1) blood meal storage silo (identified as BL-1), with a maximum throughput rate of 6,552 tons per year and controlled by a baghouse. **Note:** The maximum throughput rate of the blood meal storage silo is being increased from 3,000 tons per year to 6,552 tons per year with the addition of the boilers (B03 and BO4) and the Dupps meat cooker listed below.
- (f e) One (1) bone meal storage silo (identified as BM-1), with a maximum throughput rate of 143,488 tons per year. **Note:** The maximum throughput rate of the bone meal storage silo is being increased from 40,000 tons per year to 143,488 tons per year with the addition of the boilers (B03 and BO4) and the Dupps meat cooker listed below.
- (g f) Two (2) natural gas fired Cleaver Brooks boilers (identified as B03 and B04), each with a heat input capacity of 40.587 MMBtu per hour and exhausting at Stack B03 and B04. B03 and B04 use No. 2 fuel oil as back up fuel each with heat input capacity of 38.683 MMBtu per hour and a sulfur content of 0.5%. These units will be installed in 2003.
- ~~(h g) One (1) Dupps meat cooker used in conjunction with the rendering process with a maximum process rate of 65,700 pounds of inedible meat products per hour and controlled by stord scrubber system (identified as SC1) consisting of two (2) air condensers, one (1) venturi scrubber and two (2) packed column scrubbers. The existing cooker will be replaced with the Dupps cooker and the control modified in 2003.~~

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(b) The existing meat cooker associated with the inedible rendering process, at a maximum process rate of 28,097 pounds of inedible meat products per hour and controlled by a stord scrubber system (identified as SC1) consisting of one (1) 7,000 cubic feet per minute (cfm) venturi scrubber, one (1) 7000 cfm packed tower scrubber, and one (1) 60,000 cfm packed tower scrubber. This unit was constructed in 1990.

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

Emission Limitations and Standards

D.2.1 Particulate and Volatile Organic Compounds [326 IAC 2-8-4] [326 IAC 2-2] Pursuant to 326 IAC 2-8-4:

- (a) The potential to emit of PM₁₀ from the inedible rendering process shall not exceed 15.2 pounds of PM₁₀ per hour. This limit is equivalent to 66.8 tons per year.
- (b) The potential to emit of VOC from the inedible rendering process shall not exceed 21.1 pounds of VOC per hour. This limit is equivalent to 92.6 tons per year.
- (c) The potential to emit of H₂S from the inedible rendering process shall not exceed 10.3 pounds per hour of H₂S. This is equivalent to 45 tons of per year hydrogen sulfide.

Compliance with D.2.1(a), D.2.1(b), and D.2.1(c) renders 326 IAC 2-7 (Part 70 Program) not applicable to the source. Compliance with D.2.1(c) renders 326 IAC 2-2 (PSD) not applicable.

D.2.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities - General Reduction Requirements), the inedible rendering process is subject to the requirements of 326 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. The Stord scrubbing system is BACT.

D.2.3 Operation Of Meat Cooker

The existing meat cooker shall not operate while the Dupps meat cooker is in operation. The existing meat cooker will eventually be removed and replaced by the Dupps meat cooker.

D.2.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), allowable particulate emission rate from the inedible rendering process shall not exceed 24.1 pounds per hour when operating at a process weight rate of 14.0 tons per hour. The pounds per hour limit was calculated using the following equation:

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

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

D.2.5 Preventive Maintenance Plan [326 IAC 1-6-3]

~~Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.~~

Compliance Determination Requirements

~~D.2.6 – Particulate Control~~

~~In order to comply with Conditions D.2.1, D.2.2 and D.2.4 the stord scrubbing system (identified as SC1) for particulate control shall be in operation and control emissions from the inedible rendering process at all times the inedible rendering process is in operation.~~

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

~~D.2.7 – Visible Emissions Notations~~

- ~~(a) – Once per shift visible emission notations of the stord scrubbing system stack exhausts (identified as SC1) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) – For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- ~~(c) – In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) – A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(e) – The Compliance Response Plan for this unit 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 and Implementation shall be considered a violation of this permit.~~

~~D.2.8 – Monitoring of Scrubber Operational Parameters~~

~~The Permittee shall monitor and record the pressure drop, flow rate and pH across the stord scrubbing system used in conjunction with the inedible rendering process, at least once per shift when the associated inedible rendering process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the venturi scrubber is outside the normal range of 1.0 and 8.0 inches of water, and the pressure drop across the two (2) packed column scrubbers is outside the normal range of 3.0 to 8.0, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Compliance Response Plan – Implementation, Preparation, Records, and Reports. When for any one reading, the flow rate across the first, second and final stages of the stord scrubbing system (SC1) is less than the normal minimum of 25, 70 and 600 gallons per minute, respectively; or a minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Compliance Response Plan – Implementation, Preparation, Records, and Reports. When for any one reading, the pH across the second and final stages of the scrubber is above the normal maximum pH level of 9.0, or a pH established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Compliance Response Plan – Implementation, Preparation, Records, and Reports.~~

~~A pressure reading that is outside the above mentioned range, a flow rate that is below the above mentioned minimum, or pH above the mentioned maximum, 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 violation of this permit.~~

~~The instruments used for determining the pressure, flow rate, and pH level 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.2.9 – Scrubber Inspections~~

~~An inspection shall be performed each calendar quarter of each scrubber controlling the rendering process. Inspections required by this condition shall not be performed in consecutive months.~~

~~D.2.10 – Failure Detection~~

~~In the event that a scrubber malfunction 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 violation of this permit.~~

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

~~D.2.11 – Record Keeping Requirements~~

- ~~(a) – To document compliance with Condition D.2.7, the Permittee shall maintain records of visible emission notations of the inedible rendering process stack exhausts when venting to the atmosphere.~~
- ~~(b) – To document compliance with Condition D.2.8, the Permittee shall maintain records of the following operational parameters for each scrubber once per shift during normal operation:
 - ~~(1) – pressure drop;~~
 - ~~(2) – flow rate; and~~
 - ~~(3) – pH level.~~~~
- ~~(c) – To document compliance with Condition D.2.9, the Permittee shall maintain records of the results of the inspections required under Condition D.2.9.~~
- ~~(d) – All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.~~

Subsequent Sections will be re-numbered accordingly.

SECTION D.3.2

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (h g) The Dupps meat cooker used in conjunction with the inedible rendering process, with a maximum throughput rate of 65,700 pounds of inedible meat products per hour and controlled by a stord scrubber system (identified as SC1) consisting of two (2) air condensers, one (1) venturi scrubber and two (2) packed column scrubbers. ~~This unit will be modified in 2003.~~

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

Emission Limitations and Standards

D.3.2.1 Particulate and Volatile Organic Compounds [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4,

- (a) The potential to emit of PM10 from the inedible rendering process shall not exceed 15.2 pounds of PM10 per hour. This limit is equivalent to 66.8 tons per year.
- (b) The potential to emit of VOC from the inedible rendering process shall not exceed 21.1 pounds of VOC per hour. This limit is equivalent to 92.6 tons per year.
- (c) The potential to emit of H₂S from the inedible rendering process shall not exceed 10.3 pounds per hour of H₂S. This is equivalent to 45 tons of per year hydrogen sulfide.

Compliance with D.3.2.1(a), D.3.2.1(b), and D.3.2.1(c) renders 326 IAC 2-7 (Part 70 Program) not applicable to the source. Compliance with D.3.2.1(c) renders 326 IAC 2-2 (PSD) not applicable.

D.3.2.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities - General Reduction Requirements), the inedible rendering process is subject to the requirements of 326 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions.

Pursuant to this rule,

- (a) The Permittee shall operate the Stord scrubbing system, consisting of two (2) air condensers, one (1) venturi scrubber and two (2) packed column scrubbers, at all times when the inedible rendering process is in operation.
- (b) The Permittee shall perform VOC testing as required by Condition D. 3.2.7 6 (b).
- (c) The Permittee shall propose a VOC emission limit in pounds per ton of fat processed, based on the result of the stack test.
- (d) The Permittee shall submit an application for a significant permit revision proposing the BACT emission limit no later than sixty (60) days after completion of the stack test in order to include the BACT limit.

D.3.3 ~~Operation Of The Meat Cooker~~

~~The existing meat cooker shall not operate while the Dupps cooker is in operation. The existing cooker will eventually be removed and replaced by the Dupps meat cooker.~~

D.3.2.4.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), allowable particulate emission rate from the rendering process shall not exceed 40.8 pounds per hour when operating at a process weight rate of 32.9 tons per hour. The pounds per hour limit was calculated using the following equation:

Interpolation of the data for the process weight in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

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

D.3.2.54 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.3.2.65 Particulate Control

In order to comply with Conditions ~~D.3 2.1~~, ~~D.3 2.2~~, and ~~D.3 2.4, 3~~ the stord scrubbing system (identified as SC1) consisting of two (2) air condensers, one (1) venturi scrubber and two (2) packed column scrubbers for particulate control shall be in operation and control emissions from the inedible rendering process at all times the inedible rendering process is in operation.

D.3. 2.76 Testing Requirements

- (a) During the period between 30 and 36 months after the issuance of this FESOP, in order to demonstrate compliance with Condition ~~D.3 2.1(a)~~, the Permittee shall perform PM10 testing for the scrubbing system controlling the particulate matter emissions from the inedible rendering process, utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration. PM10 includes filterable and condensable PM10. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) The Permittee shall perform VOC and H₂S testing to demonstrate compliance with ~~D3 2.1~~ and ~~D.3 2.2~~ utilizing methods as approved by the Commissioner within sixty (60) days after achieving maximum production rate, but no later than one hundred and eighty (180) days after initial startup.

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

D.3.2.87 Visible Emissions Notations

- (a) Once per shift visible emission notations of the Stord scrubbing system stack exhausts (identified as SC1) shall be performed during normal daylight operations when exhausting

to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

D.3.2.9-8 Monitoring of Scrubber Operational Parameters

The Permittee shall monitor and record the pressure drop, flow rate and pH across the stored scrubbing system (consisting of two (2) air condensers, one (1) venturi scrubber, and two (2) packed column scrubbers) used in conjunction with the rendering process, at least once per shift when the associated rendering process is in operation when venting to the atmosphere **as set forth herein**. When for any one reading, the pressure drop across the **first stage (one (1) venturi scrubber)** is outside the normal range of 1.0 and 8.0 inches of water, and pressure drop across the **second stage and third stage (two (2) packed column scrubbers)** is outside the normal range of 3.0 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 - Implementation, Preparation, Records, and Reports. When for any one reading, the flow rate across the first stage **(one (1) venturi scrubber)** and second stage and third stage **(two (2) packed column scrubbers)** of the stored scrubbing system (SC1) is less than the normal minimum of 25 and 70 gallons per minute, respectively; or a minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Implementation, Preparation, Records, and Reports. When for any one reading, the pH of ~~any of the~~ **the two (2) packed column scrubbers** is above the normal maximum pH level of 9.0, or a pH established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Implementation, Preparation, Records, and Reports. A pressure reading that is outside the above mentioned range, a flow rate that is below the above mentioned minimum, or pH above the mentioned maximum 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 violation of this permit.

The instruments used for determining the pressure, flow rate, and pH level 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.3.2.409 Scrubber Inspections

An inspection shall be performed each calendar quarter of each scrubber controlling the rendering process. Inspections required by this condition shall not be performed in consecutive months.

D.3.2.11 Failure Detection

In the event that a scrubber malfunction 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 violation of this permit.

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

D.3.2.12 Record Keeping Requirements

- (a) To document compliance with Condition D.~~3~~**2.8-7**, the Permittee shall maintain records of visible emission notations of the rendering process stack exhausts when venting to the atmosphere.

- (b) To document compliance with Condition D.~~3~~**2.9 8**, the Permittee shall maintain records of the following operational parameters ~~for each scrubber~~ once per shift during normal operation:
 - (1) First Stage (One (1) Venturi Scrubber)**
 - (i) Pressure drop**
 - (ii) Flow rate**

 - (2) Second Stage and Third Stage (Two (2) Packed Column Scrubbers)**
 - (i) Pressure drop**
 - (ii) Flow rate**
 - (iii) Acid content (pH level)**

- ~~(1) — pressure drop;~~

- ~~(2) — flow rate; and~~

- ~~(3) — acid content (pH level).~~

- (c) To document compliance with Condition D.~~3~~**2.10-9**, the Permittee shall maintain records of the results of the inspections required under Condition D.~~3~~**2.10-9**.

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

As a result of the deletions of Section D.2, Section D.4 will be changed to D.3, D.5 will be changed to D.4, D.6 will be changed to D.5 and D.7 will be changed to D.6 as follows:

SECTION D.4-3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (e b) Two (2) natural gas fired carcass hair singer units (identified as HS1 and HS2), each rated at 12.7 MMBtu per hour and exhausting at Stacks HS1 and HS2. These units were installed in 1990.

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

Emission Limitations and Standards

There are no specifically applicable regulations that apply to these emission units.

SECTION D.5 4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (e d) One (1) blood meal storage silo (identified as BL-1), with a maximum throughput rate of 6,552 tons per year and controlled by a baghouse. **Note:** The maximum throughput rate of the blood meal storage silo is being increased from 3,000 tons per year to 6,552 tons per year with the addition of the boilers (B03 and BO4) and the Dupps meat cooker listed below.
- (f- e) One (1) bone meal storage silo (identified as BM-1), with a maximum throughput rate of 143,488 tons per year. Note: The maximum throughput rate of the bone meal storage silo is being increased from 40,000 tons per year to 143,488 tons per year with the addition of the boilers (B03 and BO4) and the Dupps meat cooker listed below.

(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 2-8-4(1)]

D.5. 4.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the bone meal storage silo and blood meal storage silo shall not exceed 26.7 and 3.38 pounds per hour when operating at a process weight rate of 32,760 and 1,496 pounds per hour, respectively.

The pounds per hour limitation was calculated with the following equation:

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

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

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

D.5 4.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.-5 4.3 Particulate Control

In order to comply with condition D.5 4.1, the baghouse for particulate control shall be in operation and control emissions from the blood meal storage silo at all times that the blood meal storage silo is in operation.

D.-5 4.4 Visible Emissions Notations

- (a) Once per shift visible emission notations of the blood meal storage silo baghouse stack exhaust shall be performed during normal daylight operations. 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 violation of this permit.

D.-5 4.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the blood meal storage silo, at least once per shift when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 5.0 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 violation of 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.-5 4.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the blood meal storage silo. Inspections are optional when venting indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.-5 4.7 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 Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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.5 4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.5 4.4, the Permittee shall maintain records of visible emission notations of the blood meal storage silo stack exhaust once per shift.
- (b) To document compliance with Condition D.5 4.5, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.5 4.6, the Permittee shall maintain records of the results of the inspections required under Condition D.5 4.6.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.6 5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (d) Three (3) smoke houses operated in batch operations, each with a maximum throughput rate of 25.6 pounds of wood per hour and 5,000 pounds of pork per hour, controlled by GERMOS GmbH smoke house scrubber and exhausting to smoke vents 1, 2, and 3. These units were installed in 1990.

(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 2-8-4(1)]

D.6 5.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from each of the three (3) smoke houses shall not exceed 7.58 pounds per hour when operating at a process weight rate of 2.50 tons per hour.

The pounds per hour limitation was calculated using the following equation:

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

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

Compliance Determination Requirements

D.-6 5.2 Particulate Control

In order to comply with Condition D.6 5.1, the GERMOS GmbH smokehouse scrubber for particulate control shall be in operation and control emissions from the three (3) smokehouses at all times the three (3) smokehouses are in operation.

SECTION D.7 6 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities:

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Rendering room scrubber (identified as SC2) associated with the rendering processes for controlling plant ventilation air emissions. This unit will be installed in 2003.
- (b) Natural gas-fired combustion sources each having a heat input equal to or less than ten million (10,000,000) Btu per hour, including heat input.
- (c) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the Permittee, that is, an on-site sewage treatment facility.
- (d) Other emergency equipment as follows: Stationary fire pumps.
- (e) Noncontact cooling tower systems with natural draft cooling tower not regulated under a NESHAP.
- (f) Other emission units and activities with potential emissions below the threshold in 326 IAC 2-7-1(21):
 - (1) Bulk truck loadout - by products.
 - (2) Bulk truck loadout - rendering process products.

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

Emission Limitations and Standards

There are no specifically applicable regulations that apply to these emission units

Response 2: See changes made in Condition D.3.9, now D.2.8 on page 9 of this letter,

Response 3: IDEM agrees that the operation of the control equipment outside of the parametric ranges does not, by itself, constitute a malfunction of the scrubber. A malfunction, as defined in 326 IAC 1-2-39, is a sudden and unavoidable failure of the control equipment to operate in its normal and usual manner (i.e., that of controlling emissions as required by the permit). Unless such a malfunction occurs, Condition D.3.9, now Condition D.2.9, requires Indiana Packers to take response steps in accordance Section C - Compliance Response Plan - Implementation, Preparation, Records, and Reports, when the scrubbers are operating outside of the parametric ranges. Therefore, no changes to the permit are necessary.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman at (800) 451-6027, press 0 and ask for extension (3-4972), or dial (317) 233-4972.

Sincerely,

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

Attachments
APD

cc: File - Carroll County
U.S. EPA, Region V
Carroll County Health Department
Air Compliance Section Inspector – Dave Rice
Compliance Data Section
Administrative and Development

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OFFICE OF AIR QUALITY

**Indiana Packers Corporation
Hwy 421 South and County Road 100 North
Delphi, Indiana 46923**

(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 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: 015-16922-00027	
Issued by: Paul Dubenetzky, Branch Chief Permit Branch Office of Air Quality	Issuance Date: August 4, 2003 Expiration Date: August 4, 2008
First Review Request No.: 015-17952, issued on September 18, 2003	
First Administrative Amendment No.: 015-18834	Pages Affected: 2 thru 7, 31 thru 43
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Permit Branch Office of Air Quality	Issuance Date: May 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 2-8-3(b)]

The Permittee owns and operates a stationary pork processing and rendering plant.

Authorized Individual:	President
Source Address:	Hwy 421 South and County Road 100 North, Delphi, Indiana 46023
Mailing Address:	Hwy 421 South and County Road 100 North, Delphi, Indiana 46023
General Source Phone:	(765) 564-3680
SIC Code:	2077
County Location:	Carroll
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules or Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

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

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

- (a) Two (2) natural gas fired boilers (identified as B01 and B02), each rated at 29.3 MMBtu per hour and exhausting at Stack B01 and B02. These units were installed in 1990.
- (b) Two (2) natural gas fired carcass hair singe units (identified as HS1 and HS2), rated at 12.7 MMBtu per hour each and exhausting at Stack HS1 and HS2. These units were installed in 1990.
- (c) Three (3) smoke house operated in batch operations, each with a maximum throughput rate of 25.6 pounds of wood per hour and 5,000 pounds of pork per hour, controlled by GERMOS GmbH smoke house scrubber and exhausting to smoke vents 1, 2, and 3. These units were installed in 1990.
- (d) One (1) blood meal storage silo (identified as BL-1), with a maximum throughput rate of 6,552 tons per year and controlled by a baghouse. **Note:** The maximum throughput rate of the blood meal storage silo is being increased from 3,000 tons per year to 6,552 tons per year with the addition of the boilers (B03 and BO4) and the Dupps meat cooker listed below.
- (e) One (1) bone meal storage silo (identified as BM-1), with a maximum throughput rate of 143,488 tons per year. **Note:** The maximum throughput rate of the bone meal storage silo is being increased from 40,000 tons per year to 143,488 tons per year with the addition of the boilers (B03 and BO4) and the Dupps meat cooker listed below.
- (f) Two (2) natural gas fired Cleaver Brooks boilers (identified as B03 and B04), each with a heat input capacity of 40.587 MMBtu per hour and exhausting at Stack B03 and B04. B03 and B04 use No. 2 fuel oil as back up fuel each with heat input capacity of 38.683 MMBtu per hour and a sulfur content of 0.5%. These units will be installed in 2003.

- (g) One (1) Dupps meat cooker used in conjunction with the rendering process with a maximum process rate of 65,700 pounds of inedible meat products per hour and controlled by stord scrubber system (identified as SC1) consisting of two (2) air condensers, one (1) venturi scrubber and two (2) packed column scrubbers.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Rendering room scrubber (identified as SC2) associated with the rendering processes for controlling plant ventilation air emissions. This unit will be installed in 2003.
- (b) Natural gas-fired combustion sources each having a heat input equal to or less than ten million (10,000,000) Btu per hour, including heat input.
- (c) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the Permittee, that is, an on-site sewage treatment facility.
- (d) Other emergency equipment as follows: Stationary fire pumps.
- (e) Noncontact cooling tower systems with natural draft cooling tower not regulated under a NESHAP.
- (f) Other emission units and activities with potential emissions below the threshold in 326 IAC 2-7-1(21):
 - (1) Bulk truck loadout - by products.
 - (2) Bulk truck loadout - rendering process products.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.

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SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (g) The Dupps meat cooker used in conjunction with the inedible rendering process, with a maximum throughput rate of 65,700 pounds of inedible meat products per hour and controlled by a stord scrubber system (identified as SC1) consisting of two (2) air condensers, one (1) venturi scrubber and two (2) packed column scrubbers.

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

Emission Limitations and Standards

D.2.1 Particulate and Volatile Organic Compounds [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4,

- (a) The potential to emit of PM₁₀ from the inedible rendering process shall not exceed 15.2 pounds of PM₁₀ per hour. This limit is equivalent to 66.8 tons per year.
- (b) The potential to emit of VOC from the inedible rendering process shall not exceed 21.1 pounds of VOC per hour. This limit is equivalent to 92.6 tons per year.
- (c) The potential to emit of H₂S from the inedible rendering process shall not exceed 10.3 pounds per hour of H₂S. This is equivalent to 45 tons of per year hydrogen sulfide.

Compliance with D.2.1(a), D.2.1(b), and D.2.1(c) renders 326 IAC 2-7 (Part 70 Program) not applicable to the source. Compliance with D.2.1(c) renders 326 IAC 2-2 (PSD) not applicable.

D.2.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities - General Reduction Requirements), the inedible rendering process is subject to the requirements of 326 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions.

Pursuant to this rule,

- (a) The Permittee shall operate the Stord scrubbing system, consisting of two (2) air condensers, one (1) venturi scrubber and two (2) packed column scrubbers, at all times when the inedible rendering process is in operation.
- (b) The Permittee shall perform VOC testing as required by Condition 3.7(b).
- (c) The Permittee shall propose a VOC emission limit in pounds per ton of fat processed, based on the result of the stack test.
- (d) The Permittee shall submit an application for a significant permit revision proposing the BACT emission limit no later than sixty (60) days after completion of the stack test in order to include the BACT limit.

D.2.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), allowable particulate emission rate from the rendering process shall not exceed 40.8 pounds per hour when operating at a process weight rate of 32.9 tons per hour. The pounds per hour limit was calculated using the following equation:

Interpolation of the data for the process weight in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

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

D.2.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.2.5 Particulate Control

In order to comply with Conditions D.2.1, D.2.2, and D.2.4, the stord scrubbing system (identified as SC1) consisting of two (2) air condensers, one (1) venturi scrubber and two (2) packed column scrubbers for particulate control shall be in operation and control emissions from the inedible rendering process at all times the inedible rendering process is in operation.

D.2.6 Testing Requirements

- (a) During the period between 30 and 36 months after the issuance of this FESOP, in order to demonstrate compliance with Condition D.2.1(a), the Permittee shall perform PM10 testing for the scrubbing system controlling the particulate matter emissions from the inedible rendering process, utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration. PM10 includes filterable and condensible PM10. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) The Permittee shall perform VOC and H₂S testing to demonstrate compliance with D.2.1 and D.2.2 utilizing methods as approved by the Commissioner within sixty (60) days after achieving maximum production rate, but no later than one hundred and eighty (180) days after initial startup.

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

D.2.7 Visible Emissions Notations

- (a) Once per shift visible emission notations of the Stord scrubbing system stack exhausts (identified as SC1) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit 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 and Implementation shall be considered a violation of this permit.

D.2.8 Monitoring of Scrubber Operational Parameters

The Permittee shall monitor and record the pressure drop, flow rate and pH across the stord scrubbing system (consisting of two (2) air condensers, one (1) venturi scrubber, and two (2)

packed column scrubbers) used in conjunction with the rendering process, at least once per shift when the associated rendering process is in operation when venting to the atmosphere as set forth herein. When for any one reading, the pressure drop across the first stage (one (1) venturi scrubber) is outside the normal range of 1.0 and 8.0 inches of water, and pressure drop across the second stage and third stage (two (2) packed column scrubbers) is outside the normal range of 3.0 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 - Implementation, Preparation, Records, and Reports. When for any one reading, the flow rate across the first stage (one (1) venturi scrubber) and second stage and third stage (two (2) packed column scrubbers) of the stord scrubbing system (SC1) is less than the normal minimum of 25 and 70 gallons per minute, respectively; or a minimum established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Implementation, Preparation, Records, and Reports. When for any one reading, the pH of the two (2) packed column scrubbers is above the normal maximum pH level of 9.0, or a pH established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Implementation, Preparation, Records, and Reports. A pressure reading that is outside the above mentioned range, a flow rate that is below the above mentioned minimum, or pH above the mentioned maximum 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 violation of this permit.

The instruments used for determining the pressure, flow rate, and pH level 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.2.9 Scrubber Inspections

An inspection shall be performed each calendar quarter of each scrubber controlling the rendering process. Inspections required by this condition shall not be performed in consecutive months.

D.2.10 Failure Detection

In the event that a scrubber malfunction 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 violation of this permit.

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

D.2.11 Record Keeping Requirements

- (a) To document compliance with Condition D.2.7, the Permittee shall maintain records of visible emission notations of the rendering process stack exhausts when venting to the atmosphere.
- (b) To document compliance with Condition D.2.8, the Permittee shall maintain records of the following operational parameters once per shift during normal operation:
 - (1) First Stage (One (1) Venturi Scrubber)
 - (i) Pressure drop
 - (ii) Flow rate
 - (2) Second Stage and Third Stage (Two (2) Packed Column Scrubbers)

- (i) Pressure drop
 - (ii) Flow rate
 - (iii) Acid content (pH level)
- (c) To document compliance with Condition D.2.9, the Permittee shall maintain records of the results of the inspections required under Condition D.2.9.
- (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 2-8-4(10):

- (c) Two (2) natural gas fired carcass hair singer units (identified as HS1 and HS2), each rated at 12.7 MMBtu per hour and exhausting at Stacks HS1 and HS2. These units were installed in 1990.

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

Emission Limitations and Standards

There are no specifically applicable regulations that apply to these emission units.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (d) One (1) blood meal storage silo (identified as BL-1), with a maximum throughput rate of 6,552 tons per year and controlled by a baghouse. **Note:** The maximum throughput rate of the blood meal storage silo is being increased from 3,000 tons per year to 6,552 tons per year with the addition of the boilers (B03 and BO4) and the Dupps meat cooker listed below.
- (e) One (1) bone meal storage silo (identified as BM-1), with a maximum throughput rate of 143,488 tons per year. **Note:** The maximum throughput rate of the bone meal storage silo is being increased from 40,000 tons per year to 143,488 tons per year with the addition of the boilers (B03 and BO4) and the Dupps meat cooker listed below.

(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 2-8-4(1)]

D.4.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the bone meal storage silo and blood meal storage silo shall not exceed 26.7 and 3.38 pounds per hour when operating at a process weight rate of 32,760 and 1,496 pounds per hour, respectively.

The pounds per hour limitation was calculated with the following equation:

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

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

D.4.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.4.3 Particulate Control

In order to comply with condition D.4.1, the baghouse for particulate control shall be in operation and control emissions from the blood meal storage silo at all times that the blood meal storage silo is in operation.

D.4.4 Visible Emissions Notations

- (a) Once per shift visible emission notations of the blood meal storage silo baghouse stack exhaust shall be performed during normal daylight operations. 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 violation of this permit.

D.4.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the blood meal storage silo, at least once per shift when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 5.0 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 - repair, 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 violation of 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.4.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the blood meal storage silo. Inspections are optional when venting indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.4.7 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 Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.4.4, the Permittee shall maintain records of visible emission notations of the blood meal storage silo stack exhaust once per shift.
- (b) To document compliance with Condition D.4.5, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.4.6, the Permittee shall maintain records of the results of the inspections required under Condition D.4.6.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (c) Three (3) smoke houses operated in batch operations, each with a maximum throughput rate of 25.6 pounds of wood per hour and 5,000 pounds of pork per hour, controlled by GERMOS GmbH smoke house scrubber and exhausting to smoke vents 1, 2, and 3. These units were installed in 1990.

(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 2-8-4(1)]

D.5.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from each of the three (3) smoke houses shall not exceed 7.58 pounds per hour when operating at a process weight rate of 2.50 tons per hour.

The pounds per hour limitation was calculated using the following equation:

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

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

Compliance Determination Requirements

D.5.2 Particulate Control

In order to comply with Condition D.5.1, the GERMOS GmbH smokehouse scrubber for particulate control shall be in operation and control emissions from the three (3) smokehouses at all times the three (3) smokehouses are in operation.

SECTION D.6 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities:

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Rendering room scrubber (identified as SC2) associated with the rendering processes for controlling plant ventilation air emissions. This unit will be installed in 2003.
- (b) Natural gas-fired combustion sources each having a heat input equal to or less than ten million (10,000,000) Btu per hour, including heat input.
- (c) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the Permittee, that is, an on-site sewage treatment facility.
- (d) Other emergency equipment as follows: Stationary fire pumps.
- (e) Noncontact cooling tower systems with natural draft cooling tower not regulated under a NESHAP.
- (f) Other emission units and activities with potential emissions below the threshold in 326 IAC 2-7-1(21):
 - (1) Bulk truck loadout - by products.
 - (2) Bulk truck loadout - rendering process products.

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

Emission Limitations and Standards

There are no specifically applicable regulations that apply to these emission units

