



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

November 19, 2004

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

TO: Interested Parties / Applicant
RE: A.E.Staley Manufacturing Company / SPM 157-19702-00003
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 impracticable 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.



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

A.E. Staley Manufacturing Company - Sagamore Plant 2245 North Sagamore Parkway Lafayette, IN 47902

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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.: T157-6009-00003	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 28, 2004 Expiration Date: June 28, 2009
First Significant Source Modification 157-18847-00003	Issuance Date:
First Significant Permit Modification 157-18915-00003	Issuance Date:
Second Significant Permit Modification 157-19702-00003	Pages Amended: Page 76 Only
Issued by:Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 19, 2004

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	8
A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
SECTION B	GENERAL CONDITIONS	24
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]	
B.3	Enforceability [326 IAC 2-7-7]	
B.4	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]	
B.11	Emergency Provisions [326 IAC 2-7-16]	
B.12	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.15	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]	
B.16	Permit Renewal [326 IAC 2-7-4]	
B.17	Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]	
B.18	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.19	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.20	Source Modification Requirement [326 IAC 2-7-10.5]	
B.21	Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]	
B.24	Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]	
SECTION C	SOURCE OPERATION CONDITIONS	34
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Operation of Equipment [326 IAC 2-7-6(6)]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-7-6(1)]	
C.9	Performance Testing [326 IAC 3-6]	

Compliance Requirements [326 IAC 2-1.1-11]

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

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

- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.13 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.14 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.15 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]
[326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

- C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.18 Compliance Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-7-5] [326 IAC 2-7-6]
- C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

- C.20 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]
- C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

Part 2 MACT Application Submittal Requirement

C.24 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e) and
326 IAC 2-7-12]

SECTION D.1 FACILITY OPERATION CONDITIONS - Corn Receiving and Handling..... 44

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

- D.1.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]
- D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.1.3 Particulate Control

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

- D.1.4 Visible Emissions Notations
- D.1.5 Monitoring for Baghouses
- D.1.6 Baghouse Inspections
- D.1.7 Broken or Failed Bag Detection

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

D.1.8 Record Keeping Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS - Wet Milling..... 48

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

SECTION D.3 FACILITY OPERATION CONDITIONS - Feed/Meal/Germ Production 52

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

- D.3.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2] [40 CFR 52.21]
- D.3.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]
- D.3.3 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-2] [326 IAC 7-2-1]
- D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.3.5 Sulfur Dioxide Emissions and Sulfur Content
- D.3.6 Particulate and Sulfur Dioxide (SO₂) Control
- D.3.7 Particulate Control
- D.3.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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

- D.3.9 Monitoring for Scrubbers
- D.3.10 Scrubber Inspections
- D.3.11 Scrubber Malfunction
- D.3.12 Visible Emissions Notations
- D.3.13 Monitoring for Baghouses
- D.3.14 Baghouse Inspections
- D.3.15 Broken or Failed Bag Detection

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

- D.3.16 Record Keeping Requirements

SECTION D.4 FACILITY OPERATION CONDITIONS - Syrup Refining 59

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

- D.4.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]
- D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.4.3 Particulate Control

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

- D.4.4 Monitoring for Eductor/Scrubber
- D.4.5 Scrubber Inspections
- D.4.6 Scrubber Malfunction
- D.4.7 Visible Emissions Notations
- D.4.8 Monitoring for Baghouses
- D.4.9 Baghouse Inspections
- D.4.10 Broken or Failed Bag Detection

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

- D.4.11 Record Keeping Requirements

SECTION D.5 FACILITY OPERATION CONDITIONS - Starch Modification 63

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

- D.5.1 Prevention of Significant Deterioration [326 IAC 2-2]
- D.5.2 Sulfur Dioxide (SO₂) Emission Limitation
- D.5.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]
- D.5.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [40 CFR 52.21] [326 IAC 2-2]
- D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.5.6 Volatile Organic Compounds (VOC) Control
- D.5.7 Particulate Control
- D.5.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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

- D.5.9 Visible Emissions Notations
- D.5.10 Monitoring for Scrubbers
- D.5.11 Scrubber Inspections
- D.5.12 Scrubber Malfunction
- D.5.13 Monitoring for Baghouses
- D.5.14 Baghouse Inspections
- D.5.15 Broken or Failed Bag Detection

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

- D.5.16 Record Keeping Requirements
- D.5.17 Reporting Requirements

SECTION D.6 FACILITY OPERATION CONDITIONS - Starch Drying and Handling 72

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

- D.6.1 Prevention of Significant Deterioration [40 CFR 52.21] [326 IAC 2-2]
- D.6.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]
- D.6.3 Volatile Organic Compounds: Best Available Control Technology [326 IAC 8-1-6] [40 CFR 52.21] [326 IAC 2-2]
- D.6.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.6.5 Particulate Control
- D.6.6 Testing Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

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

- D.6.7 Visible Emissions Notations
- D.6.8 Monitoring for Scrubbers
- D.6.9 Scrubber Inspections
- D.6.10 Scrubber Malfunction
- D.6.11 Monitoring for Baghouses
- D.6.12 Baghouse Inspections
- D.6.13 Broken or Failed Bag Detection

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

- D.6.14 Record Keeping Requirements
- D.6.15 Reporting Requirements

SECTION D.7 FACILITY OPERATION CONDITIONS - Starch Packaging and Loadout 84

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

- D.7.1 Prevention of Significant Deterioration [326 IAC 2-2] [40 CFR 52.21]
- D.7.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]
- D.7.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.7.4 Particulate Control

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

- D.7.5 Visible Emissions Notations
- D.7.6 Monitoring for Baghouses
- D.7.7 Baghouse Inspections
- D.7.8 Broken or Failed Bag Detection

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

- D.7.9 Record Keeping Requirements
- D.7.10 Reporting Requirements

SECTION D.8 FACILITY OPERATION CONDITIONS - Boiler Support Facilities 91

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

- D.8.1 Prevention of Significant Deterioration [326 IAC 2-2] [40 CFR 52.21]
- D.8.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]
- D.8.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.8.4 Particulate Control

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

- D.8.5 Visible Emissions Notations
- D.8.6 Monitoring for Baghouses
- D.8.7 Baghouse Inspections
- D.8.8 Broken or Failed Bag Detection

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

- D.8.9 Record Keeping Requirements

SECTION D.9 FACILITY OPERATION CONDITIONS - Utility area - Boilers 95

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

- D.9.1 Prevention of Significant Deterioration: Best Available Control Technology [326 IAC 2-2]
- D.9.2 Particulate Matter (Sources of Indirect Heating) [326 IAC 6-2-3(d)]
- D.9.3 Particulate Matter (Sources of Indirect Heating) [326 IAC 6-2-4]
- D.9.4 Sulfur Dioxide [326 IAC 7-1.1-2] [326 IAC 7-2-1]
- D.9.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.9.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]
- D.9.7 Particulate Control
- D.9.8 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 3-7-4]

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

- D.9.9 Sulfur Dioxide (SO₂) Emissions Monitoring [326 IAC 3-5] [326 IAC 7-2-1(g)]
- D.9.10 Nitrogen Oxides (NO_x) Emissions Monitoring [326 IAC 3-5] [326 IAC 3-5-1(d)]
- D.9.11 Continuous Opacity Monitoring [326 IAC 3-5]
- D.9.12 Opacity Readings
- D.9.13 Method 9 Opacity Readings and Visible Emissions Notations
- D.9.14 SO₂ Monitor Downtime [326 IAC 2-7-6] [326 IAC 2-7-5(1)]
- D.9.15 Visible Emissions Notations
- D.9.16 Baghouse Inspections
- D.9.17 Broken or Failed Bag Detection

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

D.9.18 Record Keeping Requirements

D.9.19 Reporting Requirements

SECTION D.10 FACILITY OPERATION CONDITIONS - Anaerobic Waste Treatment System 104

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

D.10.1 Prevention of Significant Deterioration [326 IAC 2-2] [40 CFR 52.21]

D.10.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.10.3 Sulfur Dioxide (SO₂)

D.10.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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

D.10.5 Flare Pilot Flame

D.10.6 Monitoring for Scrubbers

D.10.7 Scrubber Inspections

D.10.8 Scrubber Malfunction

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

D.10.9 Record Keeping Requirements

D.10.10 Reporting Requirements

SECTION D.11 FACILITY OPERATION CONDITIONS - Specifically Regulated Insignificant Activities . 107

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

D.11.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

D.11.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

D.11.3 Particulate [326 IAC 6-3-2]

Certification	109
Emergency Occurrence Report.....	111
Semi-Annual Natural Gas Fired Boiler Certification	113
Quarterly Reports	114-117
Quarterly Deviation and Compliance Monitoring Report	118

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 plant

Responsible Official:	Plant Manager
Source Address:	2245 North Sagamore Parkway, Lafayette, IN 47902
Mailing Address:	2200 E. Eldorado St., Decatur, IL 62521
Source Phone Number:	(217) 421-2152
SIC Code:	2046
County Location:	Tippecanoe
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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) Corn Receiving and Conveying Operations, consisting of:
- (1) One (1) Railcar Corn Dump Hopper, identified as 12V101, constructed in 1966, with emissions controlled by baghouses 21F1 and 21F17, exhausting to stack 136;
 - (2) One (1) Truck Corn Dump Hopper, identified as 12V102, constructed in 1966, with emissions controlled by baghouses 21F1 and 21F17, exhausting to stack 136;
 - (3) One (1) Bucket Corn Elevator, identified as 12U2, constructed in 1976, with emissions controlled by baghouses 21F1 and 21F17, exhausting to stack 136;
 - (4) Two (2) Corn Transfer Conveyors, identified as 12U4 and 12U5, constructed in 1966, with emissions controlled by baghouses 21F1 and 21F17, exhausting to stack 136;
 - (5) Three (3) Corn Transfer Conveyors, identified as 13U6 through 13U8, constructed in 1986, with emissions controlled by baghouses 21F1 and 21F17, exhausting to stack 136;
 - (6) Two (2) Co-Product Loadout Conveyors, identified as 8U39 and 8U41, constructed in 1966, with emissions controlled by baghouses 21F1 and 21F17, exhausting to stack 136;
 - (7) One (1) Bucket Elevator from Silos to Steeps, identified as 14U9, constructed in 1966, with emissions controlled by baghouse 14F2, exhausting to stack 126;

- (8) One (1) Corn Weigher, identified as 14V1, constructed in 1986, with emissions controlled by baghouse 14F2, exhausting to stack 126;
 - (9) Two (2) Corn Cleaners, identified as 14J4 and 14J5, constructed in 1992, with emissions controlled by baghouse 14F2, exhausting to stack 126; and
 - (10) One (1) Corn Cleanings Pneumatic Transfer, identified as 21F2, constructed in 1966, with emissions controlled by baghouse 21F2, exhausting to stack 137.
- (b) Wet Milling Operations, consisting of:
- (1) One (1) Fiber Dewatering Screen, identified as 21F100, constructed in 1990, exhausting to stack 4;
 - (2) One (1) Fiber Dewatering Screen, identified as 21F101, constructed in 1997, exhausting to stack 4;
 - (3) One (1) Germ Distribution Conveyor, identified as 21U23, constructed in 1978, exhausting to stack 4;
 - (4) One (1) Gluten Filter Receiver Tank, identified as 21V57, constructed in 1966, exhausting to stack 4;
 - (5) One (1) Germ Scrubber Water Tank, identified as 21V130, constructed in 1966, exhausting to stack 4;
 - (6) One (1) Gluten Filter Bowl Drain Tank, identified as 21V159, constructed in 1990, exhausting to stack 4;
 - (7) One (1) Gluten Filter Wash Bar Trough Drain Tank, identified as 21V59, constructed in 1966, exhausting to stack 4;
 - (8) One (1) Fiber Filtrate Tank, identified as 21V58, constructed in 1990, exhausting to stack 4;
 - (9) One (1) Heavy Steepwater Tank, identified as 21V56, constructed in 1966, exhausting to stack 4;
 - (10) One (1) Monitor Tank, identified as 15V210, constructed in 1990, exhausting to stack 4;
 - (11) Fourteen (14) Corn Steeps, identified as 14V3 through 14V16, constructed in 1966, exhausting to stack 348;
 - (12) Seven (7) Grit Starch Screens, identified as Grit Starch Screens 15J15 through 15J22, constructed in 1990, exhausting to stack 347;
 - (13) One (1) Steeped Corn Separator, identified as 15J5A, constructed in 1966, exhausting to stack 24;
 - (14) One (1) First Pass Germ Feed Tank, identified as 15V23, constructed in 1966, exhausting to stack 24;
 - (15) Steeped Corn Surge Hopper, identified as 15V21, constructed in 1966, exhausting to stack 24;

- (16) One (1) Second Pass Germ Feed Tank, identified as 15V25, constructed in 1966, exhausting to stack 347;
- (17) One (1) Grit Starch Feed Tank, identified as 15V26, constructed in 1966, exhausting to stack 347;
- (18) Two (2) Germ Wash Screens, identified as 15J99 and 15J100, constructed in 1966, exhausting to stack 347;
- (19) Three (3) Germ Washing Screens, identified as 15J101, 15J200, and 15J201, constructed in 1966, exhausting to stack 348;
- (20) One (1) Light Steepwater Receiver, identified as 14V19, constructed in 1966, exhausting to stack 348;
- (21) Germ Wash Screens, identified as 15J53, constructed in 1966, exhausting to stack 24;
- (22) One (1) Third Grind Tank, identified as 15V27, constructed in 1966, exhausting to stack 24;
- (23) One (1) Clamshell Wash Water Tank, identified as 15V2, constructed in 1991, exhausting to stack 24;
- (24) One (1) Clamshell Starch Receiver Tank, identified as 15V42, constructed in 1966, exhausting to stack 24;
- (25) One (1) Second Grind Receiver Tank, identified as 15V24, constructed in 1966, exhausting to stack 24;
- (26) One (1) First Grind receiver Tank, identified as 15V22, constructed in 1966, exhausting to stack 24;
- (27) One (1) Steeped Corn Tank, identified as 14V17, constructed in 1966, exhausting to stack 24;
- (28) One (1) Germ Water Tank, identified as 15V139, constructed in 1966, exhausting to stack 24;
- (29) Thirty-six (36) Fiber Wash Screens, identified as 1st Stage through 5th Stage Fiber Wash Screens, constructed in 1966, exhausting to stack 24;
- (30) One (1) Dent Starch Slurry Storage Tank, identified as 15V43, constructed in 1966, exhausting to stack 24;
- (31) One (1) Steepwater Head Tank, identified as 14V18, constructed in 1966, exhausting to stack 24;
- (32) One (1) Mill Acid Tank, identified as 14V96, constructed in 1966, exhausting to stack 24;
- (33) One (1) Primary Wash Box, identified as 15V17, constructed in 1966, exhausting to stack 24;
- (34) One (1) Primary Wash Box, identified as 15V19, constructed in 1966, exhausting to stack 24;

- (35) Five (5) Fiber Wash Receivers, identified as 15V110 through 15V114, constructed in 1966, exhausting to stack 24;
- (36) One (1) Process Water Tank, identified as 15V30, constructed in 1966, exhausting to stack 24;
- (37) One (1) Primary Wash Water Tank, identified as 15V41, constructed in 1966, exhausting to stack 24;
- (38) One (1) Wash Water Surge Tank, identified as 15V38, constructed in 1966, exhausting to stack 24;
- (39) One (1) Primary Feed Tank, identified as 15V34, constructed in 1966, exhausting to stack 24;
- (40) One (1) Primary Underflow Tank, identified as 15V35, constructed in 1966, exhausting to stack 24;
- (41) One (1) Gluten Thickener Feed Tank, identified as 15V36, constructed in 1966, exhausting to stack 24;
- (42) One (1) Heavy Gluten Tank, identified as 15V37, constructed in 1966, exhausting to stack 24;
- (43) One (1) Clarifier Feed Tank, identified as 15V40, constructed in 1966, exhausting to stack 24;
- (44) One (1) MST Feed Tank, identified as 15V31, constructed in 1966, exhausting to stack 24;
- (45) One (1) Vacuum Filter Pump, identified as 21C7, constructed in 1966, exhausting to stack 340;
- (46) One (1) Vacuum Filter Pump, identified as 21C8, constructed in 1966, exhausting to stack 341;
- (47) One (1) Vacuum Filter Pump, identified as 21C9, constructed in 1966, exhausting to stack 342;
- (48) One (1) Vacuum Filter Pump, identified as 21C10, constructed in 1966, exhausting to stack 343;
- (49) One (1) Gluten Vacuum Filter, identified as 21F7, constructed in 1966, exhausting to stack 340;
- (50) One (1) Gluten Vacuum Filter, identified as 21F8, constructed in 1966, exhausting to stack 341;
- (51) One (1) Gluten Vacuum Filter, identified as 21F9, constructed in 1966, exhausting to stack 342; and
- (52) One (1) Gluten Vacuum Filter, identified as 21F10, constructed in 1966, exhausting to stack 343;
- (53) One (1) High DS Starch Filter, identified as 18F510, constructed in 1995, exhausting to stack 348;

- (54) One (1) High DS Starch Tank, identified as 18V520, constructed in 1995, exhausting to stack 348;
 - (55) One (1) High DS Starch Wash Water Tank, identified as 18V522, constructed in 1995, exhausting to stack 348;
 - (56) Two (2) Second Grind Screens, identified as 15J14, and 15J24, constructed in 1966, exhausting to stack 24;
 - (57) Six (6) Sixth Stage Fiber Wash Screens, identified as 15J86, 15J87, 15J88, 15J89, 15J220, and 15J221, constructed in 1966, exhausting to stack 347;
 - (58) One (1) Steep Acid Tank, identified as 14V20, constructed in 1966, exhausting to stack 24.
 - (59) One (1) Fiber Supply Tank, identified as 15V33, constructed in 2000, exhausting to stack 347.
- (c) Feed/Meal/Germ Production Operations, consisting of:
- (1) One (1) Feed Hopper, identified as 21V60, constructed in 1965, with emissions controlled by baghouse 21F14, exhausting indoors to stack 1;
 - (2) One (1) Meal Hopper, identified as 21V61, constructed in 1965, with emissions controlled by baghouse 21F15, exhausting indoors to stack 2;
 - (3) One (1) Rail Loadout Conveyor, identified as 12U11, constructed in 1991, with emissions controlled by baghouse 12F40, exhausting to stack 3;
 - (4) One (1) 21D1 Steam Tube Germ Dryer, identified as 21D1, constructed in 1966, with emissions controlled by scrubber 21F13, exhausting to stack 17;
 - (5) One (1) 21D2 Steam Tube Germ Dryer, identified as 21D2, constructed in 1966, with emissions controlled by scrubber 21F13, exhausting to stack 17;
 - (6) One (1) 21D3 Steam Tube Germ Dryer, identified as 21D3, constructed in 1966, with emissions controlled by scrubber 21F13, exhausting to stack 17;
 - (7) One (1) 21D6 natural gas, No. 2 fuel oil, or biogas fired Feed Dryer, identified as 21D6, constructed in 1966, a heat input capacity of 22 MMBtu/hr, with emissions controlled by integral product collector/cyclone 21F26 and scrubber 21F13, exhausting to stack 17;
 - (8) One (1) 21D7 natural gas, No. 2 fuel oil, or biogas fired Feed or Meal Dryer, identified as 21D7, constructed in 1966, a heat input capacity of 22 MMBtu/hr, with emissions controlled by integral product collector/cyclone 21F27 and scrubber 21F13, exhausting to stack 17;
 - (9) One (1) 21D8 natural gas or No. 2 fuel oil fired Meal Dryer, identified as 21D8, constructed in 1966, a heat input capacity of 22 MMBtu/hr, with emissions controlled by integral product collector/cyclone 21F28 and scrubber 21F13, exhausting to stack 17;
 - (10) One (1) Feed Storage Bin, identified as 8V121, constructed in 1966, with emissions controlled by baghouse 8F1, exhausting to stack 110;

- (11) One (1) Feed Storage Bin, identified as 8V122, constructed in 1966, with emissions controlled by baghouse 8F2, exhausting to stack 111;
 - (12) One (1) Feed Storage Bin, identified as 8V123, constructed in 1966, with emissions controlled by baghouse 8F3, exhausting to stack 112;
 - (13) One (1) Feed Storage Bin, identified as 8V124, constructed in 1966, with emissions controlled by baghouse 8F4, exhausting to stack 113;
 - (14) One (1) Feed/Meal Storage Bin, identified as 8V62, constructed in 1966, with emissions controlled by baghouse 8F62, exhausting to stack 114;
 - (15) One (1) Meal Storage Bin, identified as 8V63, constructed in 1966, with emissions controlled by baghouse 8F63, exhausting to stack 115;
 - (16) One (1) Meal/Germ Storage Bin, identified as 8V53, constructed in 1966, with emissions controlled by baghouse 8F53, exhausting to stack 116;
 - (17) One (1) Germ Storage Bin, identified as 8V54, constructed in 1966, with emissions controlled by baghouse 8F54, exhausting to stack 117;
 - (18) Two (2) Air Conveying Lines to Loadout, identified as AC23 and AC24, constructed in 1966, with emissions controlled by baghouse 12F39, exhausting to stack 125;
 - (19) One (1) Feed Mill, identified as 21G51, constructed in 1965, with emissions controlled by baghouse 21F37, exhausting to stack 141;
 - (20) One (1) Feed Mill, identified as 21G52, constructed in 1965, with emissions controlled by baghouse 21F38, exhausting to stack 142;
 - (21) One (1) D6 Dryer Air Conveying Line to Feed Mill, identified as AC6, constructed in 1966, with emissions controlled by baghouse 21F32, exhausting to stack 143;
 - (22) One (1) D7 Dryer Air Conveying Line to Feed Mill, identified as AC7, constructed in 1966, with emissions controlled by baghouse 21F35, exhausting to stack 144;
 - (23) One (1) D8 Dryer Air Conveying Line to Feed Mill, identified as AC8, constructed in 1966, with emissions controlled by baghouse 21F36, exhausting to stack 145; and
 - (24) One (1) Bag Dump Station, identified as 8V99, constructed in 1966, with emissions controlled by baghouse 8F99, exhausting indoors to stack 285;
- (d) Syrup Refining Operations, consisting of:
- (1) One (1) Filteraid Storage Silo, identified as 9V32, constructed in 1966, with emissions controlled by baghouse 9F32, exhausting to stack 119;
 - (2) One (1) Filteraid Storage Silo, identified as 9V31, constructed in 1966, with emissions controlled by baghouse 9F31, exhausting to stack 123;
 - (3) One (1) Powdered Carbon Unloading, identified as 9C30, constructed in 1966, with emissions controlled by baghouse 9F30, exhausting to stack 124;

- (4) One (1) Filteraid Conveying System to Precoat Makeup Tank, identified as 18C18, constructed in 1966, with emissions controlled by baghouse 18F118, exhausting to stack 129;
 - (5) One (1) Soda Ash Storage Tank, identified as 9C40, constructed in 1966, with emissions controlled by eductor/scrubber 9E1, exhausting to stack 149;
 - (6) One (1) HCl Storage Tank (Concentrated), identified as 9V101, constructed in 1995, with emissions controlled by scrubber 9F102, exhausting to stack 156;
 - (7) One (1) Jet Cooker system/Jet Conversion Flash Chamber, identified as 18V413, constructed in 1966, with emissions uncontrolled, exhausting to stack 166;
 - (8) One (1) Jet Cooker system/Acid Reject Flash Chamber, identified as 18V312, constructed in 1966, with emissions uncontrolled, exhausting to stack 320;
 - (9) One (1) Powdered Carbon Storage Silo, identified as 9V30, constructed in 1966, with emissions controlled by baghouse 9F37, exhausting to stack 321;
 - (10) One (1) Refinery Reprocess Bag Dump, identified as 45C43, constructed in 2000, with emissions controlled by baghouse 45F43, exhausting indoors to stack 351;
- (e) Starch Modification Operations, consisting of:
- (1) One (1) Non-PO Reactor, identified as 45V115, constructed in 1966, exhausting to stack 11;
 - (2) One (1) Non-PO Reactor, identified as 45V116, constructed in 1966, exhausting to stack 12;
 - (3) One (1) Non-PO Reactor, identified as 45V222, constructed in 1973, exhausting to stack 31;
 - (4) One (1) PO Reactor, identified as 45V223, constructed in 1973, with emissions controlled by scrubber 45F212, exhausting to stack 50;
 - (5) One (1) PO Reactor, identified as 45V240, constructed in 1986, with emissions controlled by scrubber 45F212, exhausting to stack 50;
 - (6) One (1) PO Reactor, identified as 45V241, constructed in 1986, with emissions controlled by scrubber 45F212, exhausting to stack 50;
 - (7) One (1) PO Reactor, identified as 45V242, constructed in 1986, with emissions controlled by scrubber 45F212, exhausting to stack 50;
 - (8) One (1) PO Reactor, identified as 45V243, constructed in 1986, with emissions controlled by scrubber 45F212, exhausting to stack 50;
 - (9) One (1) PO Reactor, identified as 45V246, constructed in 1988, with emissions controlled by scrubber 45F212, exhausting to stack 50;
 - (10) One (1) PO Reactor, identified as 45V247, constructed in 1988, with emissions controlled by scrubber 45F212, exhausting to stack 50;

- (11) One (1) PO Reactor, identified as 45V248, constructed in 1991, with emissions controlled by scrubber 45F212, exhausting to stack 50;
- (12) One (1) PO Reactor, identified as 45V270, constructed in 1995, with emissions controlled by scrubber 45F212, exhausting to stack 50;
- (13) One (1) PO Reactor, identified as 45V271, constructed in 1995, with emissions controlled by scrubber 45F212, exhausting to stack 50;
- (14) One (1) PO Reactor, identified as 45V280, constructed in 2002, with emissions controlled by scrubber 45F212, exhausting to stack 50;
- (15) One (1) PO Reactor, identified as 45V281, constructed in 2002, with emissions controlled by scrubber 45F212, exhausting to stack 50;
- (16) One (1) Sodium Sulfate Storage Bin, identified as 45V250, constructed in 1985, with emissions controlled by two baghouses, 45F25 and 45F25a, exhausting to stack 64;
- (17) One (1) Tri-Polyphosphate Storage Bin, identified as 9V103, constructed in 1988, with emissions controlled by baghouse 9F103, exhausting to stack 68;
- (18) Two (2) Flash 2 Slurry Hold Tanks, identified as 40V20 and 40V21, constructed in 1990, with emissions uncontrolled, exhausting to stack 80;
- (19) Four (4) Belt Dryer Feed Tanks, identified as 45V117 through 45V120, constructed in 1966, with emissions uncontrolled, exhausting to stack 180;
- (20) Two (2) Spray Dryer Feed Tanks, identified as 30V1 and 30V2, constructed in 1986, with emissions uncontrolled, exhausting to stack 195;
- (21) Three (3) Spray Dryer Process Tanks, identified as 40V11, 40V12, and 40V14, constructed in 1988, with emissions uncontrolled, exhausting to stack 222;
- (22) Four (4) Flash 2 Larox Filters, identified as 40F51, 40F52, and 40F53, constructed in 1995, and 40F54, constructed in 2002, with emissions uncontrolled, exhausting to stack 249;
- (23) One (1) Dryer Starch Feed Conveyor/Flash 2 Paddle Mixer, identified as 40U23, constructed in 1995, with emissions uncontrolled, exhausting to stack 249;
- (24) One (1) Flash 2 Air Release Tank, identified as 40V15, constructed in 1995, with emissions uncontrolled, exhausting to stack 250;
- (25) Three (3) Flash 3 Larox Filters, identified as 43F71, 43F72, and 43F73, constructed in 1995, with emissions uncontrolled, exhausting to stack 260;
- (26) One (1) Flash 3 Larox Air Release Tank, identified as 43V85, constructed in 1995, with emissions uncontrolled, exhausting to stack 261;
- (27) Two (2) Flash 3 Slurry Hold Tanks, identified as 43V71 and 43V72, constructed in 1995, with emissions uncontrolled, exhausting to stack 273;
- (28) One (1) Flash 1 Starch Hold Tank, identified as 40V50, constructed in 1996, with emissions uncontrolled, exhausting to stack 289;

- (29) One (1) Conveyor 40U2, identified as 40U2, constructed in 1985, with emissions uncontrolled, exhausting to stack 315;
 - (30) One (1) Flash 1 Slurry Hold Tank, identified as 40V1, constructed in 1985, with emissions uncontrolled, exhausting to stack 315;
 - (31) One (1) Filtrate Reineveldt Centrifuge Flash Dryer 1, identified as 40Y1, with emissions uncontrolled, constructed in 1985, exhausting to stack 315;
 - (32) One (1) Flash 3 Larox Air Release Tank, identified as 43V86, constructed in 1995, with emissions uncontrolled, exhausting to stack 318;
 - (33) One (1) Starch Feed Bin, identified as 33V1, constructed in 1995, with emissions controlled by baghouse 33F1, exhausting to stack 236;
 - (34) One (1) Starch Feed Bin, identified as 33V2, constructed in 1995, with emissions controlled by baghouse 33F2, exhausting to stack 237;
 - (35) One (1) Low Pressure Dry Starch Reactor, identified as 33R1, constructed in 1995, with emissions controlled by baghouses 33F101 and 33F102, exhausting to stack 238;
 - (36) One (1) Catalyst Bin, identified as 33V5, constructed in 1995, with emissions controlled by baghouse 33F5, exhausting to stack 239;
 - (37) One (1) High Pressure Dry Starch Reactor, identified as 33R2, constructed in 1995, with emissions controlled by baghouses 33F201 and 33F202, exhausting to stack 240;
 - (38) One (1) Reactor Surge Bin, identified as 50V61, constructed in 1997, with emissions controlled by baghouse 50F161, exhausting to stack 241;
 - (39) One (1) Reactor Surge Bin, identified as 50V62, constructed in 1997, with emissions controlled by baghouse 50F162, exhausting to stack 242;
 - (40) One (1) Dry Starch Product Screening Receiver, identified as 50F48, constructed in 1997, with emissions controlled by baghouse 50F48, exhausting to stack 243;
 - (41) One (1) Dry Starch Blend Bin, identified as 33V42, constructed in 1995, with emissions controlled by baghouse 33F42, exhausting to stack 244;
 - (42) One (1) Dry Starch Blend Bin, identified as 33V43, constructed in 1995, with emissions controlled by baghouse 33F43, exhausting to stack 245;
 - (43) One (1) Dry Starch Blend Bin, identified as 33V40, constructed in 1995, with emissions controlled by baghouse 33F40, exhausting to stack 246;
 - (44) One (1) Dry Starch Blend Bin, identified as 33V41, constructed in 1995, with emissions controlled by baghouse 33F41, exhausting to stack 247;
 - (45) One (1) Dry Starch Product Screening Receiver, identified as 50F45, constructed in 1997, with emissions controlled by baghouse 50F45, exhausting to stack 262;
 - (46) One (1) Flash 2 Air Release Tank, identified as 40V16, constructed in 2002, with emissions uncontrolled, exhausting to stack 251.
- (f) Starch Drying and Handling Operation, consisting of:

- (1) One (1) Starch Flash Dryer #1, identified as 40D1, constructed in 1986, a heat input capacity of 14.4 MMBtu/hr, with emissions controlled by integral product collector/cyclones 40F1 and 40F2 and scrubber 40F3, exhausting to stack 69;
- (2) One (1) Pneumatic Product Transfer, identified as 40F7, constructed in 1986, with emissions controlled by 40F7, exhausting to stack 70;
- (3) One (1) Starch Storage Bin #8, identified as 7V8, constructed in 1986, with emissions controlled by baghouse 7F8, exhausting to stack 71;
- (4) One (1) Starch Storage Bin #9, identified as 7V9, constructed in 1986, with emissions controlled by baghouse 7F9, exhausting to stack 72;
- (5) One (1) Starch Flash Dryer #2, identified as 40D20, constructed in 1990 and modified in 1991, a heat input capacity of 40 MMBtu/hr, with emissions controlled by integral product collector/cyclones 40F20 through 40F25 and scrubber 40F26, exhausting to stack 73;
- (6) One (1) Starch Product Bin #20, identified as 7V20, constructed in 1992, with emissions controlled by baghouse 7F20, exhausting to stack 76;
- (7) One (1) Starch Product Bin #21, identified as 7V21, constructed in 1992, with emissions controlled by baghouse 7F21, exhausting to stack 77;
- (8) One (1) Starch Product Bin #22, identified as 7V22, constructed in 1992, with emissions controlled by baghouse 7F22, exhausting to stack 78;
- (9) One (1) Starch Grinder/Mill #1, identified as 40G20, constructed in 1990, with emissions controlled by baghouse 40F28, exhausting to stack 286;
- (10) One (1) Starch Grinder/Mill #2, identified as 40G21, constructed in 1990, with emissions controlled by baghouse 40F29, exhausting to stack 287;
- (11) One (1) Grinder Feed Collector 40F27, identified as 40F27, constructed in 1990, with emissions exhausting to the intake of bins 7V20, 7V21, 7V22 and 7V23;
- (12) One (1) Starch Flash Dryer #3, identified as 43D71, constructed in 1995, a heat input capacity of 40 MMBtu/hr, with emissions controlled by integral product collector/cyclones 40F81 through 40F86 and scrubber 43F80, exhausting to stack 265;
- (13) One (1) Flash #3 Mill, identified as 40G88, constructed in 1996, with emissions controlled by baghouse 40F88, exhausting to stack 266;
- (14) One (1) Starch Bin #33, identified as 7V23 (formerly identified as 7V33), constructed in 1995, with emissions controlled by baghouse 7F33, exhausting to stack 267;
- (15) One (1) Starch Bin #34, identified as 7V34, constructed in 1995, with emissions controlled by baghouse 7F34, exhausting to stack 268;
- (16) One (1) Starch Bin #35, identified as 7V35, constructed in 1995, with emissions controlled by baghouse 7F35, exhausting to stack 269;
- (17) One (1) Adipic Acid Storage Bin, identified as 43V90, constructed in 1996, with emissions controlled by baghouse 43F90, exhausting to stack 274;

- (18) One (1) Starch Transfer Bin #91, identified as 7V91, constructed in 1999, with emissions controlled by baghouse 7F91, exhausting to stack 345;
- (19) One (1) Starch Transfer Bin #92, identified as 7V92, constructed in 1999, with emissions controlled by baghouse 7F92, exhausting to stack 346;
- (20) One (1) Starch Roll Dryer #1, identified as 41D1, constructed in 1986, with emissions uncontrolled, exhausting to stack 91;
- (21) One (1) Starch Roll Dryer #2, identified as 41D2, constructed in 1986, with emissions uncontrolled, exhausting to stack 92;
- (22) One (1) Starch Roll Dryer #3, identified as 41D3, constructed in 1986, with emissions uncontrolled, exhausting to stack 93;
- (23) One (1) Starch Roll Dryer #4, identified as 41D4, constructed in 1993, with emissions uncontrolled, exhausting to stack 94;
- (24) One (1) Starch Roll Dryer #5, identified as 41D5, constructed in 1995, with emissions uncontrolled, exhausting to stack 232;
- (25) One (1) Starch Roll Dryer #6, identified as 41D6, constructed in 1995, with emissions uncontrolled, exhausting to stack 233;
- (26) One (1) Starch Roll Dryer #7, identified as 41D7, constructed in 1997, with emissions uncontrolled, exhausting to stack 234;
- (27) One (1) Starch Roll Dryer #8, identified as 41D8, constructed in 2000, with emissions uncontrolled, exhausting to stack 235;
- (28) One (1) Pneumatic Product Transfer Roll Dryer, identified as 41F210, constructed in 1986, with emissions controlled by baghouse 41F210, exhausting to stack 95;
- (29) One (1) Roll Dryer Mill, identified as 41G200, constructed in 1986, with emissions controlled by baghouse 41F200, exhausting to stack 96;
- (30) One (1) Product Bin #10, identified as 41V10, constructed in 1993, with emissions controlled by baghouse 41F10, exhausting to stack 97;
- (31) One (1) Product Bin #11, identified as 41V11, constructed in 1993, with emissions controlled by baghouse 41F11, exhausting to stack 98;
- (32) One (1) Roll Dryer Mill, identified as 41G201, constructed in 1993, with emissions controlled by baghouse 41F211, exhausting to stack 100;
- (33) One (1) Pneumatic Product Transfer Roll Dryer, identified as 41F201, constructed in 1993, with emissions controlled by baghouse 41F201, exhausting to stack 101;
- (34) One (1) Starch Bin #44, identified as 33V44, constructed in 1995, with emissions controlled by baghouse 33F44, exhausting indoors to stack 248;

- (35) One (1) Bulk Bag Dump Station, identified as 41F13, constructed in 2000, with emissions controlled by baghouse 41F13, exhausting to stack 344;
- (36) One (1) Spray Dryer, identified as 30D1, constructed in 1984, a heat input capacity of 24 MMBtu/hr, with emissions controlled by integral product collector/cyclones 30F7 and 30F8 and baghouses 30F2 and 30F3, exhausting to stack 82;
- (37) One (1) Product Transfer to Milling, identified as 30F13, constructed in 1987, with emissions controlled by baghouse 30F13, exhausting to stack 83;
- (38) One (1) Dryer Mill, identified as 30G1, constructed in 1987, with emissions controlled by baghouse 30F15, exhausting to stack 84;
- (39) One (1) Product Transfer to Bins #14 & #15, identified as 41C30, constructed in 1987, with emissions controlled by baghouses 41F14 and 41F15, exhausting to stack 85;
- (40) One (1) Product Transfer to Bins #17, #18, and #44, identified as 41C35, constructed in 1987, with emissions controlled by baghouses 41F20, 41F21, and 41F54, exhausting to stack 86;
- (41) One (1) Product Bin #14, identified as 41V14, constructed in 1987, with emissions controlled by baghouse 41F16, exhausting to stack 87;
- (42) One (1) Product Bin #15, identified as 41V15, constructed in 1987, with emissions controlled by baghouse 41F17, exhausting to stack 88;
- (43) One (1) Product Bin #17, identified as 41V17, constructed in 1987, with emissions controlled by baghouse 41F22, exhausting to stack 89;
- (44) One (1) Product Bin #18, identified as 41V18, constructed in 1987, with emissions controlled by baghouse 41F23, exhausting to stack 90;
- (45) One (1) Belts Product Conveying Mill Product to Bins #3, #4, and #5, identified as 7F25, constructed in 1966, with emissions controlled by 7F25, exhausting to stack 103;
- (46) One (1) Belts Product Conveying Mill Product to Bins #1, #2, and #3, identified as 7F26, constructed in 1966, with emissions controlled by 7F26, exhausting to stack 104;
- (47) One (1) Product Bin #5, identified as 7V46, constructed in 1966, with emissions controlled by baghouse 7F69, exhausting to stack 105;
- (48) One (1) Product Bin #4, identified as 7V47, constructed in 1966, with emissions controlled by baghouse 7F70, exhausting to stack 106;
- (49) One (1) Product Bin #3, identified as 7V48, constructed in 1966, with emissions controlled by baghouse 7F71, exhausting to stack 107;
- (50) One (1) Product Bin #2, identified as 7V49, constructed in 1966, with emissions controlled by baghouse 7F72, exhausting to stack 108;
- (51) One (1) Product Bin #1, identified as 7V50, constructed in 1966, with emissions controlled by baghouse 7F73, exhausting to stack 109;

- (52) One (1) Belt Dryer Mill, identified as 25G1, constructed in 1968, with emissions controlled by baghouse 25F2, exhausting to stack 146;
- (53) One (1) Pneumatic Conveying to Mill Feed Receiver, identified as 25F1, constructed in 1968, with emissions controlled by baghouse 25F1, exhausting to stack 147;
- (54) One (1) Regular Belt Dryer D4 and one (1) Special Belt Dryer D5, identified as 16D4 and 16D5, constructed in 1966, with emissions controlled by rotoclone scrubbers 16F26, 17F78, 16F27, and 17F79, exhausting to stack 177;
- (55) One (1) Spray Agglomeration System, identified as 50D101, constructed in 2001, a heat input capacity of 6.2 MMBtu/hr, with emissions controlled by integral product collector/cyclones 50F111 and 50F112 and baghouse 50F102, exhausting to stack 349; and
- (56) One (1) Agglomeration Blender Receiver/Baghouse, identified as 50F106, constructed in 2001, with emissions controlled by baghouse 50F106, exhausting to stack 350;
- (g) Starch Packaging and Loadout Operations, consisting of:
 - (1) One (1) Product Bin #6 and Cyclonic Product Collector, identified as 17V6 and 17F5, constructed in 1984, with emissions controlled by baghouse 17F6, exhausting to stack 190;
 - (2) One (1) Product Transfer to Main Packer #1, identified as 16F5, constructed in 1966, with emissions controlled by baghouse 16F5, exhausting to stack 102;
 - (3) One (1) Cationic Product Receiver for Packer #1, identified as 17F27, constructed in 1966, with emissions controlled by baghouse 17F27, exhausting to stack 102;
 - (4) One (1) Packer #1, identified as 17Z38, constructed in 1966, with emissions controlled by baghouse 17F10, exhausting to stack 177;
 - ((5) One (1) Reprocess Bag/Tote Dump, identified as 17U58, constructed in 1997, with emissions controlled by baghouse 17F58, exhausting indoors to stack 334;
 - (6) One (1) Bag Packer #2 House Dust Collector, identified as 17F2, constructed in 1995, with emissions controlled by baghouse 17F2, exhausting to stack 177;
 - (7) One (1) Bag Packer #2, identified as 17Z01, constructed in 1995, with emissions controlled by baghouse 17F01, exhausting to stack 177;
 - (8) One (1) Spray Dryer Product Transfer to Bag Packer #3, identified as 41F7, constructed in 1986, with emissions controlled by baghouse 41F7, exhausting to stack 184;
 - (9) One (1) Spray Dryer Product Starch Bag Packer (North Spouts Packer #3), identified as 41Z3, constructed in 1986, with emissions controlled by baghouse 41F7, exhausting to stack 184;
 - (10) One (1) Roll Dried & Dry Starch Reaction System Products Malto Product Transfer to Bag Packer #3, identified as 41F18, constructed in 1986, with emissions controlled by baghouse 41F18, exhausting to stack 186;

- (11) One (1) Roll Dried & Dry Starch Reaction System Products Malto Bag Packer (South Spouts Packer #3), identified as 41Z5, constructed in 1986, with emissions controlled by baghouse 41F18, exhausting to stack 186;
 - (12) One (1) Bag Packer #4, identified as 17Z03, constructed in 1995, with emissions controlled by baghouses 17F03 and 17F04, exhausting to stack 332;
 - (13) One (1) House Dust Collection System for Bag Packer #4, identified as 17F15, constructed in 1995, with emissions controlled by baghouse 17F15, exhausting to stack 333;
 - (14) One (1) Bag Packer #3 House, identified as 41F44, constructed in 1995, with emissions controlled by baghouse 41F44, exhausting to stack 256;
 - (15) One (1) Product Transfer for #1 Bulk Bagger, identified as 16F25, constructed in 1988, with emissions controlled by baghouse 16F25, exhausting to stack 191;
 - (16) One (1) Bulk Bagger #2, identified as 17Z14, constructed in 1996, with emissions controlled by baghouse 17F14, exhausting to stack 254;
 - (17) Three (3) Product Receivers for #3 Bulk Bagger, identified as 41F8, 41F81, and 41F82, constructed in 1988, 1997, and 1997 respectively, with emissions controlled by baghouses 41F8, 41F81, and 41F82, exhausting to stack 208;
 - (18) One (1) Bulk Starch Rail Loadout (Track #10), identified as 20F60, constructed in 1993, with emissions controlled by baghouse 20F60, exhausting to stack 79;
 - (19) One (1) Starch Truck/Rail Loadout, identified as 20F61, constructed in 1966, with emissions controlled by baghouse 20F61, exhausting to stack 135;
 - (20) One (1) J4 Starch Rail Loadout System, identified as 16F100, constructed in 1989, with emissions controlled by baghouse 16F100, exhausting to stack 183;
 - (21) One (1) Dextrin/Roll/Spray Cooked Starch Bulk Truck Loadout, identified as 41F6, constructed in 1988, with emissions controlled by baghouse 41F6, exhausting to stack 189;
 - (22) One (1) Pneumatic Truck Loadout, identified as Truck Loadout, constructed in 1997, with emissions controlled by baghouses 20F78 and 20F79, exhausting to stack 264;
 - (23) One (1) Bulk #1 Product Screening System, identified as 20F1, constructed in 1997, with emissions controlled by baghouse 20F1, exhausting to stack 330;
 - (24) One (1) Bulk #2 Product Screening System, identified as 20F50, constructed in 1997, with emissions controlled by baghouse 20F50, exhausting to stack 331; and
- (h) Boiler support facilities, consisting of:
- (1) One (1) Boiler Ash Silo and Truck Loading, identified as 31V1, constructed in 1984, with emissions controlled by baghouse 31F1, exhausting to stack 199;
 - (2) One (1) Boiler Ash Pneumatic Transfer to Ash Silo, identified as 31F10, constructed in 1984, with emissions controlled by baghouse 31F22, exhausting to stack 200;

- (3) One (1) Coal Storage Silo, identified as 31V3, constructed in 1984, with emissions controlled by baghouse 31F21, exhausting to stack 203;
 - (4) One (1) Coal Day Bin, identified as 31V4, constructed in 1984, with emissions controlled by baghouse 31F19, exhausting to stack 204;
 - (5) One (1) Coal Day Bin, identified as 31V5, constructed in 1984, with emissions controlled by baghouse 31F20, exhausting to stack 205;
 - (6) One (1) Utilities Lime Storage Silo, identified as 31V10, constructed in 1984, with emissions controlled by baghouse 31F18, exhausting to stack 201;
- (i) Utility area, consisting of:
- (1) Three (3) natural gas or No. 2 fuel oil-fired Boilers, identified as 11B1, 11B2 and 11B3, each with a heat input capacity of 125 MMBtu/hr, constructed in 1966, with emissions uncontrolled, exhausting to stack 197;
 - (2) One (1) coal-fired Boiler, identified as 31B1, with a heat input capacity of 231 MMBtu/hr, constructed in 1984, with low-NO_x burners fueled by natural gas or No. 2 fuel oil, with emissions controlled by baghouse 31F2, exhausting to stack 202;
- (j) One (1) Wastewater Treatment Anaerobic Digester, identified as 34V10, constructed in 1985, with emissions controlled by: a scrubber (34V11) and main flare (21Z1) which exhaust to stack 271, and an emergency flare (34Z1) which exhausts to stack 272. Note that the biogas is used by dryers 21D6 and 21D7 and if the biogas produced exceeds the dryers' capacity, then the gas is flared off.

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) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (c) Structural steel and bridge fabrication activities using 80 tons or less of welding consumables. [326 IAC 6-3-2]
- (d) Covered conveyors for coal or coke conveying of less than or equal to 360 tons per day. [326 IAC 6-3-2]
- (e) Uncovered coal conveying of less than or equal to 120 tons per day. [326 IAC 6-3-2]
- (f) Coal bunker and coal scale exhausts and associated dust collector vents. [326 IAC 6-3-2]
- (g) Vents from ash transport systems not operated at positive pressure. [326 IAC 6-3-2]

- (h) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 10 tons per year SO₂, NO_x, or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs: Corn Storage Silo Bins (13V1 through 13V5) and ten dewatering presses. [326 IAC 6-3-2]
- (i) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

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

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

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

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

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

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

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

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the

status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1st of each year to:

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

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

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this

permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 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.

- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source,

except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

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

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

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

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

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

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

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

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

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-17-3-2][IC13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, any records that must be kept under the conditions of this permit;

- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section (BLT)), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

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

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

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

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Demolition and renovation

The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

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

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

C.9 Performance Testing [326 IAC 3-6]

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment.
- (b) In the event that a breakdown of a continuous opacity monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (c) Whenever a continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup COM shall be brought online within four (4) hours of shutdown of the primary COM, if possible. If this is not possible, visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of one (1) hour beginning four (4) hours after the start of the malfunction or down time.
 - (1) If the reading period begins less than one hour before sunset, readings shall be performed until sunset. If the first required reading period would occur between sunset and sunrise, the first reading shall be performed as soon as there is sufficient daylight.
 - (2) Method 9 opacity readings shall be repeated for a minimum of one (1) hour at least once every four (4) hours during daylight operations, until such time that the continuous opacity monitor is back in operation.
 - (3) All of the opacity readings during this period shall be reported in the Quarterly Deviation and Compliance Monitoring Reports.
- (d) Nothing in this permit, shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5.

C.13 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

- (b) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment in accordance with applicable federal regulations and 326 IAC 3-5.
- (c) The CEMS shall be operated at all times as specified in Section D, except during CEMS malfunctions, reasonable periods of necessary CEMS calibration or CEMS maintenance activities. CEMS calibration and maintenance activities shall be properly documented and shall be conducted pursuant to the standard operating procedures under 326 IAC 3-5-4(a).
- (d) The Permittee shall keep records in accordance with 326 IAC 3-5-6(b) that includes the following:
 - (1) All documentation relating to:
 - (A) design, installation, and testing of all elements of the monitoring system; and
 - (B) required corrective action or compliance plan activities.
 - (2) All maintenance logs, calibration checks, and other required quality assurance activities.
 - (3) All records of corrective and preventive action.
 - (4) A log of plant operations, including the following:
 - (A) Date of facility downtime.
 - (B) Time of commencement and completion of each downtime.
 - (C) Reason for each downtime.
- (e) In accordance with 326 IAC 3-5-7(5), the Permittee shall submit reports of continuous monitoring system instrument downtime, except for zero (0) and span checks, which shall be reported separately. The reports shall include the following:
 - (1) Date of downtime.
 - (2) Time of commencement.
 - (3) Duration of each downtime.
 - (4) Reasons for each downtime.
 - (5) Nature of system repairs and adjustments.

- (f) Except where permit conditions streamline similar applicable requirements pursuant to 326 IAC 2-7-24, nothing in this permit shall excuse the Permittee from complying with 326 IAC 3-5.

C.14 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.15 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (" 2%) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (" 2%) of full scale reading.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on June 29, 1999.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.18 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63 , such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.19 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 response action documents submitted pursuant to this condition do 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.20 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)(2), starting in 2005 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 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 purposes 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 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.21 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this Permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

Part 2 MACT Application Submittal Requirement

C.24 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e) and 326 IAC 2-7-12]

- (a) The Permittee shall submit a Part 2 Maximum Achievable Control Technology (MACT) Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).
- (b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:
 - (1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;
 - (2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or
 - (3) The MACT standard or standards for the affected source categories included at the source are promulgated.
- (c) Notwithstanding paragraph (a), the Permittee shall comply with an applicable promulgated MACT standard, including the initial notification requirements of the MACT standard, in accordance with the schedule provided in the MACT standard, if the MACT standard is promulgated prior to the Part 2 MACT Application deadline. If a MACT has been promulgated and the source is subject to the MACT, the Permittee shall submit an application for a significant permit modification under 326 IAC 2-7-12 no later than nine (9) months prior to the compliance date for the MACT. The application should include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed. If a permit renewal application is due before the date that a significant permit modification application would be due, the Permittee shall include the required information in the renewal application in lieu of submitting an application for a significant permit modification.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Corn Receiving and Handling Operations

- (a) Corn Receiving and Handling Operations, consisting of:
- (1) One (1) Railcar Corn Dump Hopper, identified as 12V101, constructed in 1966, with emissions controlled by baghouses 21F1 and 21F17, exhausting to stack 136;
 - (2) One (1) Truck Corn Dump Hopper, identified as 12V102, constructed in 1966, with emissions controlled by baghouses 21F1 and 21F17, exhausting to stack 136;
 - (3) One (1) Bucket Corn Elevator, identified as 12U2, constructed in 1976, with emissions controlled by baghouses 21F1 and 21F17, exhausting to stack 136;
 - (4) Two (2) Corn Transfer Conveyors, identified as 12U4 and 12U5, constructed in 1966, with emissions controlled by baghouses 21F1 and 21F17, exhausting to stack 136;
 - (5) Three (3) Corn Transfer Conveyors, identified as 13U6 through 13U8, constructed in 1986, with emissions controlled by baghouses 21F1 and 21F17, exhausting to stack 136;
 - (6) Two (2) Co-Product Loadout Conveyors, identified as 8U39 and 8U41, constructed in 1966, with emissions controlled by baghouses 21F1 and 21F17, exhausting to stack 136;
 - (7) One (1) Bucket Elevator from Silos to Steeps, identified as 14U9, constructed in 1966, with emissions controlled by baghouse 14F2, exhausting to stack 126;
 - (8) One (1) Corn Weigher, identified as 14V1, constructed in 1986, with emissions controlled by baghouse 14F2, exhausting to stack 126;
 - (9) Two (2) Corn Cleaners, identified as 14J4 and 14J5, constructed in 1992, with emissions controlled by baghouse 14F2, exhausting to stack 126; and
 - (10) One (1) Corn Cleanings Pneumatic Transfer, identified as 21F2, constructed in 1966, with emissions controlled by baghouse 21F2, exhausting to stack 137.

(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 Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, particulate emissions from facilities 12V101, 12V102, 12U2, 12U4, 12U5, 13U6, 13U7, 13U8, 8U39, 8U41, 14V1, 14J4, 14J5, 14U9, and 21F2 (exhausting to stacks 136, 126, and 137) shall be limited using one of the following equations (as applicable):

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

Or depending on the process weight rate:

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

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

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughput of the respective facilities is treated as confidential.

D.1.2 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 baghouses.

Compliance Determination Requirements

D.1.3 Particulate Control

In order to comply with Condition D.1.1, baghouses 21F1, 21F17, 14F2, and 21F2 for particulate control shall be in operation and control particulate emissions from facilities 12V101, 12V102, 12U2, 12U4, 12U5, 13U6, 13U7, 13U8, 8U39, 8U41, 14V1, 14J4, 14J5, 14U9, and 21F2 at all times those facilities are in operation.

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 exhaust from stack 136 shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the exhaust from stack 126 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (c) 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.
- (d) 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.
- (e) 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.
- (f) 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.1.5 Monitoring for Baghouses

- (a) The Permittee shall record the total static pressure drop across baghouse 21F1, used in conjunction with facilities 12V101, 12V102, 12U2, 12U4, 12U5, at least once per shift when the respective facilities are in operation.

- (b) The Permittee shall record the total static pressure drop across baghouses 21F17 and 14F2, used in conjunction with facilities 13U6, 13U7, 13U8, 8U39, 8U41, 14V1, 14J4, 14J5, and 14U9, at least once per day when the respective facilities are in operation.
- (c) When, for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the last 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.
- (d) 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.1.6 Baghouse Inspections

- (a) An external inspection of all bags, controlling particulate emissions from facilities 12V101, 12V102, 12U2, 12U4, and 12U5, shall be performed at least once per calendar quarter. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (b) An internal inspection of all bags, controlling particulate emissions from facilities 12V101, 12V102, 12U2, 12U4, 12U5, 13U6, 13U7, 13U8, 8U39, 8U41, 14V1, 14J4, 14J5, 14U9, and 21F2, shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (c) Inspections shall also be performed before a respective baghouse that has been secured and tagged as being out of service is returned to service. All defective bags shall be replaced.

D.1.7 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. 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 deviation from this permit. If operations continue after bag failure has been observed and it will be 10 (ten) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (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 Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of the total static pressure drop during normal operation.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections.
- (c) To document compliance with Condition D.1.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (b) Wet Milling Operations, consisting of:
- (1) One (1) Fiber Dewatering Screen, identified as 21F100, constructed in 1990, exhausting to stack 4;
 - (2) One (1) Fiber Dewatering Screen, identified as 21F101, constructed in 1997, exhausting to stack 4;
 - (3) One (1) Germ Distribution Conveyor, identified as 21U23, constructed in 1978, exhausting to stack 4;
 - (4) One (1) Gluten Filter Receiver Tank, identified as 21V57, constructed in 1966, exhausting to stack 4;
 - (5) One (1) Germ Scrubber Water Tank, identified as 21V130, constructed in 1966, exhausting to stack 4;
 - (6) One (1) Gluten Filter Bowl Drain Tank, identified as 21V159, constructed in 1990, exhausting to stack 4;
 - (7) One (1) Gluten Filter Wash Bar Trough Drain Tank, identified as 21V59, constructed in 1966, exhausting to stack 4;
 - (8) One (1) Fiber Filtrate Tank, identified as 21V58, constructed in 1990, exhausting to stack 4;
 - (9) One (1) Heavy Steepwater Tank, identified as 21V56, constructed in 1966, exhausting to stack 4;
 - (10) One (1) Monitor Tank, identified as 15V210, constructed in 1990, exhausting to stack 4;
 - (11) Fourteen (14) Corn Steeps, identified as 14V3 through 14V16, constructed in 1966, exhausting to stack 348;
 - (12) Seven (7) Grit Starch Screens, identified as Grit Starch Screens 15J15 through 15J22, constructed in 1990, exhausting to stack 347;
 - (13) One (1) Steeped Corn Separator, identified as 15J5A, constructed in 1966, exhausting to stack 24;
 - (14) One (1) First Pass Germ Feed Tank, identified as 15V23, constructed in 1966, exhausting to stack 24;

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

SECTION D.2 FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]: Wet Milling Operations (continued)

- (15) Steeped Corn Surge Hopper, identified as 15V21, constructed in 1966, exhausting to stack 24;
- (16) One (1) Second Pass Germ Feed Tank, identified as 15V25, constructed in 1966, exhausting to stack 347;
- (17) One (1) Grit Starch Feed Tank, identified as 15V26, constructed in 1966, exhausting to stack 347;
- (18) Two (2) Germ Wash Screens, identified as 15J99 and 15J100, constructed in 1966, exhausting to stack 347;
- (19) Three (3) Germ Washing Screens, identified as 15J101, 15J200, and 15J201, constructed in 1966, exhausting to stack 348;
- (20) One (1) Light Steepwater Receiver, identified as 14V19, constructed in 1966, exhausting to stack 348;
- (21) Germ Wash Screens, identified as 15J53, constructed in 1966, exhausting to stack 24;
- (22) One (1) Third Grind Tank, identified as 15V27, constructed in 1966, exhausting to stack 24;
- (23) One (1) Clamshell Wash Water Tank, identified as 15V2, constructed in 1991, exhausting to stack 24;
- (24) One (1) Clamshell Starch Receiver Tank, identified as 15V42, constructed in 1966, exhausting to stack 24;
- (25) One (1) Second Grind Receiver Tank, identified as 15V24, constructed in 1966, exhausting to stack 24;
- (26) One (1) First Grind receiver Tank, identified as 15V22, constructed in 1966, exhausting to stack 24;
- (27) One (1) Steeped Corn Tank, identified as 14V17, constructed in 1966, exhausting to stack 24;
- (28) One (1) Germ Water Tank, identified as 15V139, constructed in 1966, exhausting to stack 24;
- (29) Thirty-six (36) Fiber Wash Screens, identified as 1st Stage through 5th Stage Fiber Wash Screens, constructed in 1966, exhausting to stack 24;
- (30) One (1) Dent Starch Slurry Storage Tank, identified as 15V43, constructed in 1966, exhausting to stack 24;

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

SECTION D.2 FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]: Wet Milling Operations (continued)

- (31) One (1) Steepwater Head Tank, identified as 14V18, constructed in 1966, exhausting to stack 24;
- (32) One (1) Mill Acid Tank, identified as 14V96, constructed in 1966, exhausting to stack 24;
- (33) One (1) Primary Wash Box, identified as 15V17, constructed in 1966, exhausting to stack 24;
- (34) One (1) Primary Wash Box, identified as 15V19, constructed in 1966, exhausting to stack 24;
- (35) Five (5) Fiber Wash Receivers, identified as 15V110 through 15V114, constructed in 1966, exhausting to stack 24;
- (36) One (1) Process Water Tank, identified as 15V30, constructed in 1966, exhausting to stack 24;
- (37) One (1) Primary Wash Water Tank, identified as 15V41, constructed in 1966, exhausting to stack 24;
- (38) One (1) Wash Water Surge Tank, identified as 15V38, constructed in 1966, exhausting to stack 24;
- (39) One (1) Primary Feed Tank, identified as 15V34, constructed in 1966, exhausting to stack 24;
- (40) One (1) Primary Underflow Tank, identified as 15V35, constructed in 1966, exhausting to stack 24;
- (41) One (1) Gluten Thickener Feed Tank, identified as 15V36, constructed in 1966, exhausting to stack 24;
- (42) One (1) Heavy Gluten Tank, identified as 15V37, constructed in 1966, exhausting to stack 24;
- (43) One (1) Clarifier Feed Tank, identified as 15V40, constructed in 1966, exhausting to stack 24;
- (44) One (1) MST Feed Tank, identified as 15V31, constructed in 1966, exhausting to stack 24;
- (45) One (1) Vacuum Filter Pump, identified as 21C7, constructed in 1966, exhausting to stack 340;
- (46) One (1) Vacuum Filter Pump, identified as 21C8, constructed in 1966, exhausting to stack 341;

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

SECTION D.2 FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]: Wet Milling Operations (continued)

- (47) One (1) Vacuum Filter Pump, identified as 21C9, constructed in 1966, exhausting to stack 342;
- (48) One (1) Vacuum Filter Pump, identified as 21C10, constructed in 1966, exhausting to stack 343;
- (49) One (1) Gluten Vacuum Filter, identified as 21F7, constructed in 1966, exhausting to stack 340;
- (50) One (1) Gluten Vacuum Filter, identified as 21F8, constructed in 1966, exhausting to stack 341;
- (51) One (1) Gluten Vacuum Filter, identified as 21F9, constructed in 1966, exhausting to stack 342; and
- (52) One (1) Gluten Vacuum Filter, identified as 21F10, constructed in 1966, exhausting to stack 343;
- (53) One (1) High DS Starch Filter, identified as 18F510, constructed in 1995, exhausting to stack 348;
- (54) One (1) High DS Starch Tank, identified as 18V520, constructed in 1995, exhausting to stack 348;
- (55) One (1) High DS Starch Wash Water Tank, identified as 18V522, constructed in 1995, exhausting to stack 348;
- (56) Two (2) Second Grind Screens, identified as 15J14, and 15J24, constructed in 1966, exhausting to stack 24;
- (57) Six (6) Sixth Stage Fiber Wash Screens, identified as 15J86, 15J87, 15J88, 15J89, 15J220, and 15J221, constructed in 1966, exhausting to stack 347;
- (58) One (1) Steep Acid Tank, identified as 14V20, constructed in 1966, exhausting to stack 24.
- (59) One (1) Fiber Supply Tank, identified as 15V33, constructed in 2000, exhausting to stack 347.

(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)]

There are no specifically applicable requirements.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Feed/Meal/Germ Production Operations

- (c) Feed/Meal/Germ Production Operations, consisting of:
- (1) One (1) Feed Hopper, identified as 21V60, constructed in 1965, with emissions controlled by baghouse 21F14, exhausting indoors to stack 1;
 - (2) One (1) Meal Hopper, identified as 21V61, constructed in 1965, with emissions controlled by baghouse 21F15, exhausting indoors to stack 2;
 - (3) One (1) Rail Loadout Conveyor, identified as 12U11, constructed in 1991, with emissions controlled by baghouse 12F40, exhausting to stack 3;
 - (4) One (1) 21D1 Steam Tube Germ Dryer, identified as 21D1, constructed in 1966, with emissions controlled by scrubber 21F13, exhausting to stack 17;
 - (5) One (1) 21D2 Steam Tube Germ Dryer, identified as 21D2, constructed in 1966, with emissions controlled by scrubber 21F13, exhausting to stack 17;
 - (6) One (1) 21D3 Steam Tube Germ Dryer, identified as 21D3, constructed in 1966, with emissions controlled by scrubber 21F13, exhausting to stack 17;
 - (7) One (1) 21D6 natural gas, No. 2 fuel oil, or biogas fired Feed Dryer, identified as 21D6, constructed in 1966, a heat input capacity of 22 MMBtu/hr, with emissions controlled by integral product collector/cyclone 21F26 and scrubber 21F13, exhausting to stack 17;
 - (8) One (1) 21D7 natural gas, No. 2 fuel oil, or biogas fired Feed or Meal Dryer, identified as 21D7, constructed in 1966, a heat input capacity of 22 MMBtu/hr, with emissions controlled by integral product collector/cyclone 21F27 and scrubber 21F13, exhausting to stack 17;
 - (9) One (1) 21D8 natural gas or No. 2 fuel oil fired Meal Dryer, identified as 21D8, constructed in 1966, a heat input capacity of 22 MMBtu/hr, with emissions controlled by integral product collector/cyclone 21F28 and scrubber 21F13, exhausting to stack 17;
 - (10) One (1) Feed Storage Bin, identified as 8V121, constructed in 1966, with emissions controlled by baghouse 8F1, exhausting to stack 110;
 - (11) One (1) Feed Storage Bin, identified as 8V122, constructed in 1966, with emissions controlled by baghouse 8F2, exhausting to stack 111;
 - (12) One (1) Feed Storage Bin, identified as 8V123, constructed in 1966, with emissions controlled by baghouse 8F3, exhausting to stack 112;
 - (13) One (1) Feed Storage Bin, identified as 8V124, constructed in 1966, with emissions controlled by baghouse 8F4, exhausting to stack 113;
 - (14) One (1) Feed/Meal Storage Bin, identified as 8V62, constructed in 1966, with emissions controlled by baghouse 8F62, exhausting to stack 114;

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

SECTION D.3

FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]: Feed/Meal/Germ Production Operations (continued)

- (15) One (1) Meal Storage Bin, identified as 8V63, constructed in 1966, with emissions controlled by baghouse 8F63, exhausting to stack 115;
- (16) One (1) Meal/Germ Storage Bin, identified as 8V53, constructed in 1966, with emissions controlled by baghouse 8F53, exhausting to stack 116;
- (17) One (1) Germ Storage Bin, identified as 8V54, constructed in 1966, with emissions controlled by baghouse 8F54, exhausting to stack 117;
- (18) One (1) Air Conveying Lines to Loadout, identified as AC23 and AC24, constructed in 1966, with emissions controlled by baghouse 12F39, exhausting to stack 125;
- (19) One (1) Feed Mill, identified as 21G51, constructed in 1965, with emissions controlled by baghouse 21F37, exhausting to stack 141;
- (20) One (1) Feed Mill, identified as 21G52, constructed in 1965, with emissions controlled by baghouse 21F38, exhausting to stack 142;
- (21) One (1) D6 Dryer Air Conveying Line to Feed Mill, identified as AC6, constructed in 1966, with emissions controlled by baghouse 21F32, exhausting to stack 143;
- (22) One (1) D7 Dryer Air Conveying Line to Feed Mill, identified as AC7, constructed in 1966, with emissions controlled by baghouse 21F35, exhausting to stack 144;
- (23) One (1) D8 Dryer Air Conveying Line to Feed Mill, identified as AC8, constructed in 1966, with emissions controlled by baghouse 21F36, exhausting to stack 145; and
- (24) One (1) Bag Dump Station, identified as 8V99, constructed in 1966, with emissions controlled by baghouse 8F99, exhausting indoors to stack 285;

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

Pursuant to CP 157-4160-00003, issued April 5, 1995, the PM/PM10 emissions from scrubber 21F13 (used to control emissions from dryers 21D1, 21D2, 21D3, 21D6, 21D7, and 21D8) shall not exceed 11.5 pounds per hour. Compliance with this limit is equivalent to PM/PM10 emissions of less than or equal to 50.4 tons per year and renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.3.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, particulate emissions from facilities 21D1, 21D2, 21D3, 21D6, 21D7, 21D8, 21V60, 21V61, 12U11, 8V121 through 8V124, 8V62, 8V63, 8V53, 8V54, AC23, AC24, 21G51, 21G52, AC6, AC7, AC8, and 8V99 shall be limited using one of the following equations (as applicable):

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

Or depending on the process weight rate:

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

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

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughput of the respective facilities is treated as confidential.

D.3.3 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-2] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1-2 (SO₂ Emissions Limitations), the SO₂ emissions from dryers 21D6, 21D7, and 21D8 shall not exceed five-tenths (0.5) pounds per million Btu (MMBtu) per dryer when combusting No. 2 fuel oil. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average. 326 IAC 7-1.1 and 326 IAC 7-2-1 are not federally enforceable.

D.3.4 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.3.5 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions from dryers 21D6, 21D7, and 21D8 do not exceed five-tenths (0.5) pounds per million Btu heat input, when burning distillate oil, by:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

A determination of noncompliance pursuant to the methods specified above shall not be refuted by evidence of compliance pursuant to the other method.

D.3.6 Particulate and Sulfur Dioxide (SO₂) Control

In order to comply with Conditions D.3.1, D.3.2 and D.3.3, scrubber 21F13 for particulate and SO₂ control shall be in operation and control emissions from dryers 21D1, 21D2, 21D3, 21D6, 21D7, and 21D8 at all times any dryer is in operation.

D.3.7 Particulate Control

In order to comply with Condition D.3.2, baghouses, including those integral to the process, 21F14, 21F15, 12F40, 8F1, 8F2, 8F3, 8F4, 8F62, 8F63, 8F53, 8F54, 12F39, 21F37, 21F38, 21F32, 21F35, 21F36, and 8F99 for particulate control shall be in operation and control particulate emissions from facilities 21V60, 21V61, 12U11, 8V121 through 8V124, 8V62, 8V63, 8V53, 8V54, AC23, AC24, 21G51, 21G52, AC6, AC7, AC8, and 8V99 at all times those facilities are in operation.

D.3.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.3.1, no later than 36 months after issuance of this Part 70 permit, the Permittee shall perform PM and PM-10 testing on stack 17 (exhausting emissions from facilities 21D1, 21D2, 21D3, 21D6, 21D7, and 21D8) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of valid compliance demonstration. If PM-10 is assumed to be 100% of PM, only PM tests need be performed. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.3.9 Monitoring for Scrubbers

- (a) The permittee shall monitor the pH of the scrubbing liquor and scrubber recirculation rate at least once per shift from scrubber 21F13 controlling emissions from facilities 21D1, 21D2, 21D3, 21D6, 21D7, and 21D8.
- (b) The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when the pH and flow rate readings are outside of the normal range for any one reading. A pH or flow reading that is outside the normal 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.
- (b) The instruments used for determining the pH and flow rate shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.3.10 Scrubber Inspections

An inspection of the scrubber used to control emissions from facilities 21D1, 21D2, 21D3, 21D6, 21D7, and 21D8 shall be performed semiannually. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.

D.3.11 Scrubber Malfunction

In the event that a scrubber malfunction has been observed:

- (a) The affected unit will be shut down immediately in accordance with safe operating procedures until the failed unit has been repaired or the appropriate components replaced".
- (b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.3.12 Visible Emissions Notations

- (a) Visible emission notations of the exhaust from stacks 3 and 17 shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the exhaust from stacks 110, 111, 112, 113, 114, 115, 116, and 117 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (c) 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.
- (d) 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.

- (e) 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.
- (f) 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.3.13 Monitoring for Baghouses

- (a) The Permittee shall record the total static pressure drop across the baghouse, used in conjunction with facility 12U11 at least once per shift when the respective facilities are in operation.
- (b) The Permittee shall record the total static pressure drop across the baghouses, used in conjunction with facilities 8V121 through 8V124, 8V62, 8V63, 8V53, and 8V54 at least once per day when the respective facilities are in operation.
- (c) When, for any one reading, the pressure drop across the baghouses are outside the normal range of 3.0 and 6.0 inches of water or a range established during the last 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.
- (d) 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.3.14 Baghouse Inspections

- (a) An external inspection of all bags, controlling particulate emissions from facility 12U11, shall be performed at least once per calendar quarter. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (b) An internal inspection of all bags, controlling particulate emissions from facilities 12U11, 8V121 through 8V124, 8V62, 8V63, 8V53, and 8V54, shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (c) Inspections shall also be performed before a respective baghouse that has been secured and tagged as being out of service is returned to service. All defective bags shall be replaced.

D.3.15 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. 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 deviation from this permit. If operations continue after bag failure has been observed and it will be 10 (ten) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (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 Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.16 Record Keeping Requirements

- (a) To document compliance with Condition D.3.3, the Permittee shall maintain records in accordance with (1) through (6) below.
- (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions; and
 - (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.3.9(a), the Permittee shall maintain records of the pH and scrubber recirculation rate at least once per shift from the scrubber controlling emissions from facilities 21D1, 21D2, 21D3, 21D6, 21D7, and 21D8.
- (c) To document compliance with Condition D.3.12, the Permittee shall maintain records of the visible emission notations of the stack exhaust.
- (d) To document compliance with Condition D.3.13, the Permittee shall maintain records of the total static pressure drop during normal operation.

- (e) To document compliance with Conditions D.3.10 and D.3.14, the Permittee shall maintain records of the results of the inspections.
- (f) To document compliance with Condition D.3.4, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

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

- (d) Syrup Refining Operations, consisting of:
- (1) One (1) Filteraid Storage Silo, identified as 9V32, constructed in 1966, with emissions controlled by baghouse 9F32, exhausting to stack 119;
 - (2) One (1) Filteraid Storage Silo, identified as 9V31, constructed in 1966, with emissions controlled by baghouse 9F31, exhausting to stack 123;
 - (3) One (1) Powdered Carbon Unloading, identified as 9C30, constructed in 1966, with emissions controlled by baghouse 9F30, exhausting to stack 124;
 - (4) One (1) Filteraid Conveying System to Precoat Makeup Tank, identified as 18C18, constructed in 1966, with emissions controlled by baghouse 18F118, exhausting to stack 129;
 - (5) One (1) Soda Ash Storage Tank, identified as 9C40, constructed in 1966, with emissions controlled by eductor/scrubber 9E1, exhausting to stack 149;
 - (6) One (1) HCl Storage Tank (Concentrated), identified as 9V101, constructed in 1995, with emissions controlled by scrubber 9F102, exhausting to stack 156;
 - (7) One (1) Jet Cooker system/Jet Conversion Flash Chamber, identified as 18V413, constructed in 1966, with emissions uncontrolled, exhausting to stack 166;
 - (8) One (1) Jet Cooker system/Acid Reject Flash Chamber, identified as 18V312, constructed in 1966, with emissions uncontrolled, exhausting to stack 320;
 - (9) One (1) Powdered Carbon Storage Silo, identified as 9V30, constructed in 1966, with emissions controlled by baghouse 9F37, exhausting to stack 321;
 - (10) One (1) Refinery Reprocess Bag Dump, identified as 45C43, constructed in 2000, with emissions controlled by baghouse 45F43, exhausting indoors to stack 351;

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

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

D.4.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, particulate emissions from facilities 9V31, 9V32, 9C30, 18C18, 9C40, 9V30, and 45C43 shall be limited using one of the following equations (as applicable):

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

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

Or depending on the process weight rate:

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

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

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughputs of the respective facilities is treated as confidential.

D.4.2 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.4.3 Particulate Control

- (a) In order to comply with Condition D.4.1, scrubber 9E1 for particulate control shall be in operation and control particulate emissions from facility 9C40 at all times the respective facilities are in operation.
- (b) In order to comply with Condition D.4.1, baghouses 9F31, 9F32, 18F118, 9F37, 9F30, and 45F43 for particulate control shall be in operation and control particulate emissions from facilities 9V31, 9V32, 18C18, 9V30, 9C30, and 45C43 at all times those facilities are in operation.

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

D.4.4 Monitoring for Eductor/Scrubber

- (a) The permittee shall make a visible observation for the presence of scrubber recirculation flow each time that soda ash is unloaded through eductor/scrubber 9E1 controlling emissions from facility 9C40.
- (b) The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when an inadequate scrubber recirculation flow is observed. An inadequate flow reading 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.
- (c) The instrument used for determining the flow rate 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.4.5 Scrubber Inspections

An inspection of scrubbers 9E1 and 9F102 shall be performed semi-annually. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.

D.4.6 Scrubber Malfunction

In the event that a scrubber malfunction has been observed:

- (a) The affected unit will be shut down immediately in accordance with safe operating procedures until the failed unit has been repaired or the appropriate components replaced.
- (b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.4.7 Visible Emissions Notations

- (a) Visible emission notations of the exhaust from stack 321 shall be performed once per day

during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

- (b) Visible emission notations of the exhaust from stacks 149, 123, 119, and 124 shall be performed each time rail or truck unloading operations occur. A trained employee shall record whether emissions are normal or abnormal.
- (c) 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.
- (d) 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.
- (e) 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.
- (f) 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.4.8 Monitoring for Baghouses

- (a) The Permittee shall record the total static pressure drop across baghouses 9F31, 9F32, 9F37, and 9F30, used in conjunction with facilities 9V31, 9V32, 9V30, and 9C30, at least once per day when the respective facilities are in operation.
- (b) When, for any one reading, the pressure drop across the baghouses are outside the normal range of 3.0 and 6.0 inches of water or a range established during the last 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.
- (c) 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.4.9 Baghouse Inspections

- (a) An internal inspection of all bags, controlling particulate emissions from facilities 9V31, 9V32, 18C18, 9V30, and 9C30, shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (b) Inspections shall also be performed before a respective baghouse that has been secured and tagged as being out of service is returned to service. All defective bags shall be replaced.

D.4.10 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. 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 deviation from this permit. If operations continue after bag failure has been observed and it will be 10 (ten) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (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 Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.11 Record Keeping Requirements

- (a) To document compliance with Condition D.4.4, the Permittee shall maintain observations of scrubber recirculation flow each time soda ash is unloaded from the scrubbers controlling emissions from facility 9C40.
- (b) To document compliance with Condition D.4.7, the Permittee shall maintain records of the visible emission notations of the stack exhaust.
- (c) To document compliance with Condition D.4.8, the Permittee shall maintain records of the total static pressure drop during normal operation.
- (d) To document compliance with Conditions D.4.5 and D.4.9, the Permittee shall maintain records of the results of the inspections.
- (e) To document compliance with Condition D.4.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (f) 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 2-7-5(15)]: Starch Modification Operations

- (e) Starch Modification Operations, consisting of:
- (1) One (1) Non-PO Reactor, identified as 45V115, constructed in 1966, with emissions uncontrolled, exhausting to stack 11;
 - (2) One (1) Non-PO Reactor, identified as 45V116, constructed in 1966, with emissions uncontrolled, exhausting to stack 12;
 - (3) One (1) Non-PO Reactor, identified as 45V222, constructed in 1973, with emissions uncontrolled, exhausting to stack 31;
 - (4) One (1) PO Reactor, identified as 45V223, constructed in 1973, with emissions controlled by scrubber 45F212, exhausting to stack 50;
 - (5) One (1) PO Reactor, identified as 45V240, constructed in 1986, with emissions controlled by scrubber 45F212, exhausting to stack 50;
 - (6) One (1) PO Reactor, identified as 45V241, constructed in 1986, with emissions controlled by scrubber 45F212, exhausting to stack 50;
 - (7) One (1) PO Reactor, identified as 45V242, constructed in 1986, with emissions controlled by scrubber 45F212, exhausting to stack 50;
 - (8) One (1) PO Reactor, identified as 45V243, constructed in 1986, with emissions controlled by scrubber 45F212, exhausting to stack 50;
 - (9) One (1) PO Reactor, identified as 45V246, constructed in 1988, with emissions controlled by scrubber 45F212, exhausting to stack 50;
 - (10) One (1) PO Reactor, identified as 45V247, constructed in 1988, with emissions controlled by scrubber 45F212, exhausting to stack 50;
 - (11) One (1) PO Reactor, identified as 45V248, constructed in 1991, with emissions controlled by scrubber 45F212, exhausting to stack 50;
 - (12) One (1) PO Reactor, identified as 45V270, constructed in 1995, with emissions controlled by scrubber 45F212, exhausting to stack 50;
 - (13) One (1) PO Reactor, identified as 45V271, constructed in 1995, with emissions controlled by scrubber 45F212, exhausting to stack 50;
 - (14) One (1) PO Reactor, identified as 45V280, constructed in 2002, with emissions controlled by scrubber 45F212, exhausting to stack 50;

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

SECTION D.5

FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]: Starch Modification Operations (continued)

- (15) One (1) PO Reactor, identified as 45V281, constructed in 2002, with emissions controlled by scrubber 45F212, exhausting to stack 50;
- (16) One (1) Sodium Sulfate Storage Bin, identified as 45V250, constructed in 1985, with emissions controlled by two baghouses, 45F25 and 45F25a, exhausting to stack 64;
- (17) One (1) Tri-Polyphosphate Storage Bin, identified as 9V103, constructed in 1988, with emissions controlled by baghouse 9F103, exhausting to stack 68;
- (18) Two (2) Flash 2 Slurry Hold Tanks, identified as 40V20 and 40V21, constructed in 1990, with emissions uncontrolled, exhausting to stack 80;
- (19) Four (4) Belt Dryer Feed Tanks, identified as 45V117 through 45V120, constructed in 1966, with emissions uncontrolled, exhausting to stack 180;
- (20) Two (2) Spray Dryer Feed Tanks, identified as 30V1 and 30V2, constructed in 1986, with emissions uncontrolled, exhausting to stack 195;
- (21) Three (3) Spray Dryer Process Tanks, identified as 40V11, 40V12, and 40V14, constructed in 1988, with emissions uncontrolled, exhausting to stack 222;
- (22) Four (4) Flash 2 Larox Filters, identified as 40F51, 40F52, and 40F53, constructed in 1995, and 40F54, constructed in 2002, with emissions uncontrolled, exhausting to stack 249;
- (23) One (1) Dryer Starch Feed Conveyor/Flash 2 Paddle Mixer, identified as 40U23, constructed in 1995, with emissions uncontrolled, exhausting to stack 249;
- (24) One (1) Flash 2 Air Release Tank, identified as 40V15, constructed in 1995, with emissions uncontrolled, exhausting to stack 250;
- (25) Three (3) Flash 3 Larox Filters, identified as 43F71, 43F72, and 43F73, constructed in 1995, with emissions uncontrolled, exhausting to stack 260;
- (26) One (1) Flash 3 Larox Air Release Tank, identified as 43V85, constructed in 1995, with emissions uncontrolled, exhausting to stack 261;
- (27) Two (2) Flash 3 Slurry Hold Tanks, identified as 43V71 and 43V72, constructed in 1995, with emissions uncontrolled, exhausting to stack 273;
- (28) One (1) Flash 1 Starch Hold Tank, identified as 40V50, constructed in 1996, with emissions uncontrolled, exhausting to stack 289;
- (29) One (1) Conveyor 40U2, identified as 40U2, constructed in 1985, with emissions uncontrolled, exhausting to stack 315;

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

SECTION D.5 FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]: Starch Modification Operations (continued)

- (30) One (1) Flash 1 Slurry Hold Tank, identified as 40V1, constructed in 1985, with emissions uncontrolled, exhausting to stack 315;
- (31) One (1) Filtrate Reineveldt Centrifuge Flash Dryer 1, identified as 40Y1, with emissions uncontrolled, constructed in 1985, exhausting to stack 315;
- (32) One (1) Flash 3 Larox Air Release Tank, identified as 43V86, constructed in 1995, with emissions uncontrolled, exhausting to stack 318;
- (33) One (1) Starch Feed Bin, identified as 33V1, constructed in 1995, with emissions controlled by baghouse 33F1, exhausting to stack 236;
- (34) One (1) Starch Feed Bin, identified as 33V2, constructed in 1995, with emissions controlled by baghouse 33F2, exhausting to stack 237;
- (35) One (1) Low Pressure Dry Starch Reactor, identified as 33R1, constructed in 1995, with emissions controlled by baghouses 33F101 and 33F102, exhausting to stack 238;
- (36) One (1) Catalyst Bin, identified as 33V5, constructed in 1995, with emissions controlled by baghouse 33F5, exhausting to stack 239;
- (37) One (1) High Pressure Dry Starch Reactor, identified as 33R2, constructed in 1995, with emissions controlled by baghouses 33F201 and 33F202, exhausting to stack 240;
- (38) One (1) Reactor Surge Bin, identified as 50V61, constructed in 1997, with emissions controlled by baghouse 50F161, exhausting to stack 241;
- (39) One (1) Reactor Surge Bin, identified as 50V62, constructed in 1997, with emissions controlled by baghouse 50F162, exhausting to stack 242;
- (40) One (1) Dry Starch Product Screening Receiver, identified as 50F48, constructed in 1997, with emissions controlled by baghouse 50F48, exhausting to stack 243;
- (41) One (1) Dry Starch Blend Bin, identified as 33V42, constructed in 1995, with emissions controlled by baghouse 33F42, exhausting to stack 244;
- (42) One (1) Dry Starch Blend Bin, identified as 33V43, constructed in 1995, with emissions controlled by baghouse 33F43, exhausting to stack 245;
- (43) One (1) Dry Starch Blend Bin, identified as 33V40, constructed in 1995, with emissions controlled by baghouse 33F40, exhausting to stack 246;
- (44) One (1) Dry Starch Blend Bin, identified as 33V41, constructed in 1995, with emissions controlled by baghouse 33F41, exhausting to stack 247;
- (45) One (1) Dry Starch Product Screening Receiver, identified as 50F45, constructed in 1997, with emissions controlled by baghouse 50F45, exhausting to stack 262; and
- (46) One (1) Flash 2 Air Release Tank, identified as 40V16, constructed in 2002, with emissions uncontrolled, exhausting to stack 251.

(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.5.1 Prevention of Significant Deterioration [326 IAC 2-2]

Pursuant to CP 157-4195-00003, issued August 25, 1995, A 157-6170-00003, issued July 26, 1996, the particulate matter emissions are limited as indicated in the table below:

<u>Facility</u>	<u>Stack</u>	<u>PM/PM10 emission limit (lb/hr)</u>	<u>PM/PM10 emission limit (ton/12mo*)</u>
Starch Feed Bin (33V1)	236	0.29	1.26
Starch Feed Bin (33V2)	237	0.29	1.26
Low Pressure Dry Starch Reactor (33R1)	238	0.078	0.34
Catalyst Storage Bin (33V5)	239	0.034	0.15
Dry Starch Blend Bins (33V42, 33V43, 33V40, and 33V41)	244, 245, 246, 247	0.55	2.4
Dry Starch Product Screening Receiver (50F45)	262	0.07	0.31

*12 mo - Twelve consecutive month period with compliance determined at the end of each month.

Compliance with these limits shall render the requirements of 326 IAC 2-2 not applicable.

D.5.2 Sulfur Dioxide (SO₂) Emission Limitation

The amount of acid-thinned starch produced from the reactors 45V115, 45V116, and 45V222 is limited to fifty million (50,000,000) pounds per twelve (12) consecutive month period with compliance determined at the end of each month.

This voluntary limit, based on sulfur dioxide (SO₂) emissions of 43 pounds SO₂ per 100,000 pounds of acid-thinned starch, has been incorporated to limit the potential to emit SO₂ from reactors 45V115, 45V116, and 45V222 to 10.8 tons per year.

D.5.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, particulate emissions from facilities 45V250, 9V103, 33V1, 33V2, 33R1, 33V5, 33R2, 50V61, 50V62, 33V42, 33V43, 33V40, 33V41, 50F45, and 50F48 shall be limited using one of the following equations (as applicable):

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

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

Or depending on the process weight rate:

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

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

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughput of the respective facilities is treated as confidential.

D.5.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [40 CFR 52.21] [326 IAC 2-2]

Pursuant to 326 IAC 8-1-6, and CP 157-10232-00003, issued October 12, 1999:

- (a) The combined propylene oxide input to facilities (listed in Section D.5) 40V1, 40U2, 40Y1, 40V50, 40V20, 40V21, 40V15, 40V16, 40F51, 40F52, 40F53, 40F54, 40U23, 43V71, 43V72, 43F71, 43F72, 43F73, 43V85, 43V86, 45V117, 45V118, 45V119, 45V120, 30V1, 30V2, 40V12, 40V11, 40V14, 45V223, 45V240, 45V241, 45V242, 45V243, 45V246, 45V247, 45V248, 45V270, 45V271, 45V280, 45V281, (listed in Section D.6) 40D1, 40D20, 43D71, 41D1, 41D2, 41D3, 41D4, 41D5, 41D6, 41D7, 41D8, 30D1, 16D4 and 16D5 shall not exceed 15,000 tons per twelve consecutive month period with compliance determined at the end of each month.
- (b) The VOC emissions from scrubber 45F212, controlling emissions from facilities 45V223, 45V240, 45V241, 45V242, 45V243, 45V246, 45V247, 45V248, 45V270, 45V271, 45V280, and 45V281, shall not exceed 3.25 lb per 100,000 lb of acid-killed starch and 6.0 lb per 100,000 lb of non-acid-killed starch (equivalent to a minimum 95% overall control efficiency).

Compliance with this limit is equivalent to total VOC emissions of less than 5.15 tons per year, will satisfy the requirements of 326 IAC 8-1-6, and render the requirements of 326 IAC 2-2 and 40 CFR 52.21 not applicable.

D.5.5 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.5.6 Volatile Organic Compounds (VOC) Control

Pursuant to CP 157-10232-00003, issued October 12, 1999, and in order to comply with Condition D.5.4(b), scrubber 45F212, determined to be BACT, for VOC control shall be in operation and control emissions from facilities 45V223, 45V240, 45V241, 45V242, 45V243, 45V246, 45V247, 45V248, 45V270, 45V271, 45V280, and 45V281 at all times any of those facilities are in operation. The scrubber must maintain a minimum reduction efficiency of 95% and a minimum flow rate of 390 gallons of liquid per minute.

D.5.7 Particulate Control

In order to comply with Conditions D.5.1 and D.5.2, baghouses, including those integral to the process, 45F25, 45F25a, 9F103, 33F1, 33F2, 33F101, 33F102, 33F5, 33F201, 33F202, 50F161, 50F162, 50F48, 33F42, 33F43, 33F40, 33F41, and 50F45 for particulate control shall be in operation and control particulate emissions from facilities 45V250, 9V103, 33V1, 33V2, 33R1, 33V5, 50V61, 50V62, 50F48, 33V42, 33V43, 33V40, 33V41, 50F45, and 33R2 at all times those facilities are in operation.

D.5.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

To demonstrate compliance with Condition D.5.4, no later than 36 months after issuance of this permit, the Permittee shall perform VOC testing on stack 50 (exhausting VOC emissions from facilities 45V223, 45V240, 45V241, 45V242, 45V243, 45V246, 45V247, 45V248, 45V270, 45V271, 45V280, and 45V281) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.5.9 Visible Emissions Notations

- (a) Visible emission notations of the exhaust from stacks 241 and 242 shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the exhaust from stacks 64, 68, and 240 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (c) 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.
- (d) 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.
- (e) 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.
- (f) 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.5.10 Monitoring for Scrubbers

- (a) The Permittee shall monitor the pH of the scrubbing liquid and exhaust air stream pressure drop across the scrubber at least once per shift from scrubber 45F212 controlling emissions from facilities 45V223, 45V240, 45V241, 45V242, 45V243, 45V246, 45V247, 45V248, 45V270, 45V271, 45V280, and 45V281. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when the pH or pressure drop readings are outside of the normal range for any one reading. A pH or pressure drop reading that is outside the normal 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.
- (b) A continuous monitoring system shall be installed and operated at all times scrubber 45F212 is in operation. The monitoring system shall continuously measure and record the scrubber recirculation rate from scrubber 45F212 controlling emissions from facilities 45V223, 45V240, 45V241, 45V242, 45V243, 45V246, 45V247, 45V248, 45V270, 45V271, 45V280, and 45V281. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when any 1-hr average flow rate is below the minimum flow rate specified in Condition D.5.6. A flow rate reading that is below the minimum flow rate 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.
- (c) The instruments used for determining the pH, pressure drop and flow rate shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.5.11 Scrubber Inspections

An inspection of scrubber 45F212 shall be performed semi-annually. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.

D.5.12 Scrubber Malfunction

In the event that a scrubber malfunction has been observed:

- (a) The affected unit will be shut down immediately in accordance with safe operating procedures until the failed unit has been repaired or the appropriate components replaced".
- (b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.5.13 Monitoring for Baghouses

- (a) The Permittee shall record the total static pressure drop across baghouses 50F161 and 50F162, used in conjunction with facilities 50V61 and 50V62, at least once per shift when the respective facilities are in operation.
- (b) The Permittee shall record the total static pressure drop across baghouses 45F25, 45F25a, 9F103, 33F201, and 33F202, used in conjunction with facilities 45V250, 9V103, and 33R2, at least once per day when the respective facilities are in operation.
- (c) When, for any one reading, the pressure drop across the baghouses are outside the normal range of 3.0 and 6.0 inches of water or a range established during the last 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.
- (d) 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.5.14 Baghouse Inspections

- (a) An external inspection of all bags, controlling particulate emissions from facilities 50V61 and 50V62, shall be performed at least once per calendar quarter. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (b) An internal inspection of all bags, controlling particulate emissions from facilities 50V61, 50V62 45V250, 9V103, and 33R2, shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (c) Inspections shall also be performed before a respective baghouse that has been secured and tagged as being out of service is returned to service. All defective bags shall be replaced.

D.5.15 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. 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 deviation from this permit. If operations continue after bag failure has been observed and it will be 10 (ten) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (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 Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.16 Record Keeping Requirements

- (a) To document compliance with Condition D.5.2, the Permittee shall maintain monthly records of the amount of acid-thinned starch produced from 45V115, 45V116, and 45V222.
- (b) To document compliance with Condition D.5.4, the Permittee shall maintain monthly records of the input propylene oxide to facilities 40V1, 40U2, 40Y1, 40V50, 40V20, 40V21, 40V15, 40V16, 40F51, 40F52, 40F53, 40F54, 40U23, 43V71, 43V72, 43F71, 43F72, 43F73, 43V85, 43V86, 45V117, 45V118, 45V119, 45V120, 30V1, 30V2, 40V12, 40V11, 40V14, 45V223, 45V240, 45V241, 45V242, 45V243, 45V246, 45V247, 45V248, 45V270, 45V271, 45V280, 45V281, 40D1, 40D20, 43D71, 41D1, 41D2, 41D3, 41D4, 41D5, 41D6, 41D7, 41D8, 30D1, 16D4, and 16D5. Note that this record is the same record as required in Condition D.6.14(b).
- (c) To document compliance with Condition D.5.9, the Permittee shall maintain records of visible emission notations of the stacks' exhaust.
- (d) To document compliance with Condition D.5.10, the Permittee shall maintain records of the following with respect to scrubber 45F212:
 - (1) The pH of the scrubbing liquid and exhaust air stream pressure drop across the scrubber at least once per shift, and
 - (2) The scrubber recirculation rate as read by the continuous monitor.
- (e) To document compliance with Condition D.5.13, the Permittee shall maintain records of the total static pressure drop during normal operation.
- (f) To document compliance with Conditions D.5.11 and D.5.14, the Permittee shall maintain records of the results of the inspections.

- (g) To document compliance with Condition D.5.5, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (h) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.17 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the three (3) month period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Note that this report is the same report as required in Condition D.6.15.

SECTION D.6

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Starch Drying and Handling Operations

- (f) Starch Drying and Handling Operation, consisting of:
- (1) One (1) Starch Flash Dryer #1, identified as 40D1, constructed in 1986, a heat input capacity of 14.4 MMBtu/hr, with emissions controlled by integral product collector/cyclones 40F1 and 40F2 and scrubber 40F3, exhausting to stack 69;
 - (2) One (1) Pneumatic Product Transfer, identified as 40F7, constructed in 1986, with emissions controlled by baghouse 40F7, exhausting to stack 70;
 - (3) One (1) Starch Storage Bin #8, identified as 7V8, constructed in 1986, with emissions controlled by baghouse 7F8, exhausting to stack 71;
 - (4) One (1) Starch Storage Bin #9, identified as 7V9, constructed in 1986, with emissions controlled by baghouse 7F9, exhausting to stack 72;
 - (5) One (1) Starch Flash Dryer #2, identified as 40D20, constructed in 1990 and modified in 1991, a heat input capacity of 40 MMBtu/hr, with emissions controlled by integral product collector/cyclones 40F20 through 40F25 and scrubber 40F26, exhausting to stack 73;
 - (6) One (1) Starch Product Bin #20, identified as 7V20, constructed in 1992, with emissions controlled by baghouse 7F20, exhausting to stack 76;
 - (7) One (1) Starch Product Bin #21, identified as 7V21, constructed in 1992, with emissions controlled by baghouse 7F21, exhausting to stack 77;
 - (8) One (1) Starch Product Bin #22, identified as 7V22, constructed in 1992, with emissions controlled by baghouse 7F22, exhausting to stack 78;
 - (9) One (1) Starch Grinder/Mill #1, identified as 40G20, constructed in 1990, with emissions controlled by baghouse 40F28, exhausting to stack 286;
 - (10) One (1) Starch Grinder/Mill #2, identified as 40G21, constructed in 1990, with emissions controlled by baghouse 40F29, exhausting to stack 287;
 - (11) One (1) Grinder Feed Collector 40F27, identified as 40F27, constructed in 1990, with emissions exhausting to the intake of bins 7V20, 7V21, 7V22 and 7V23;
 - (12) One (1) Starch Flash Dryer #3, identified as 43D71, constructed in 1995, a heat input capacity of 40 MMBtu/hr, with emissions controlled by integral product collector/cyclones 40F81 through 40F86 and scrubber 43F80, exhausting to stack 265;
 - (13) One (1) Flash #3 Mill, identified as 40G88, constructed in 1996, with emissions controlled by baghouse 40F88, exhausting to stack 266;
 - (14) One (1) Starch Bin #33, identified as 7V23 (formerly identified as 7V33), constructed in 1995, with emissions controlled by baghouse 7F33, exhausting to stack 267;

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

SECTION D.6

FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]: Starch Drying and Handling Operations (continued)

- (15) One (1) Starch Bin #34, identified as 7V34, constructed in 1995, with emissions controlled by baghouse 7F34, exhausting to stack 268;
- (16) One (1) Starch Bin #35, identified as 7V35, constructed in 1995, with emissions controlled by baghouse 7F35, exhausting to stack 269;
- (17) One (1) Adipic Acid Storage Bin, identified as 43V90, constructed in 1996, with emissions controlled by baghouse 43F90, exhausting to stack 274;
- (18) One (1) Starch Transfer Bin #91, identified as 7V91, constructed in 1999, with emissions controlled by baghouse 7F91, exhausting to stack 345;
- (19) One (1) Starch Transfer Bin #92, identified as 7V92, constructed in 1999, with emissions controlled by baghouse 7F92, exhausting to stack 346;
- (20) One (1) Starch Roll Dryer #1, identified as 41D1, constructed in 1986, with emissions uncontrolled, exhausting to stack 91;
- (21) One (1) Starch Roll Dryer #2, identified as 41D2, constructed in 1986, with emissions uncontrolled, exhausting to stack 92;
- (22) One (1) Starch Roll Dryer #3, identified as 41D3, constructed in 1986, with emissions uncontrolled, exhausting to stack 93;
- (23) One (1) Starch Roll Dryer #4, identified as 41D4, constructed in 1993, with emissions uncontrolled, exhausting to stack 94;
- (24) One (1) Starch Roll Dryer #5, identified as 41D5, constructed in 1995, with emissions uncontrolled, exhausting to stack 232;
- (25) One (1) Starch Roll Dryer #6, identified as 41D6, constructed in 1995, with emissions uncontrolled, exhausting to stack 233;
- (26) One (1) Starch Roll Dryer #7, identified as 41D7, constructed in 1997, with emissions uncontrolled, exhausting to stack 234;
- (27) One (1) Starch Roll Dryer #8, identified as 41D8, constructed in 2000, with emissions uncontrolled, exhausting to stack 235;
- (28) One (1) Pneumatic Product Transfer Roll Dryer, identified as 41F210, constructed in 1986, with emissions controlled by baghouse 41F210, exhausting to stack 95;
- (29) One (1) Roll Dryer Mill, identified as 41G200, constructed in 1986, with emissions controlled by baghouse 41F200, exhausting to stack 96;
- (30) One (1) Product Bin #10, identified as 41V10, constructed in 1993, with emissions controlled by baghouse 41F10, exhausting to stack 97;

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

SECTION D.6

FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]: Starch Drying and Handling Operations (continued)

- (31) One (1) Product Bin #11, identified as 41V11, constructed in 1993, with emissions controlled by baghouse 41F11, exhausting to stack 98;
- (32) One (1) Roll Dryer Mill, identified as 41G201, constructed in 1993, with emissions controlled by baghouse 41F211, exhausting to stack 100;
- (33) One (1) Pneumatic Product Transfer Roll Dryer, identified as 41F201, constructed in 1993, with emissions controlled by baghouse 41F201, exhausting to stack 101;
- (34) One (1) Starch Bin #44, identified as 33V44, constructed in 1995, with emissions controlled by baghouse 33F44, exhausting to stack 248;
- (35) One (1) Bulk Bag Dump Station, identified as 41F13, constructed in 2000, with emissions controlled by baghouse 41F13, exhausting indoors to stack 344;
- (36) One (1) Spray Dryer, identified as 30D1, constructed in 1984, a heat input capacity of 24 MMBtu/hr, with emissions controlled by integral product collector/cyclones 30F7 and 30F8 and baghouses 30F2 and 30F3, exhausting to stack 82;
- (37) One (1) Product Transfer to Milling, identified as 30F13, constructed in 1987, with emissions controlled by baghouse 30F13, exhausting to stack 83;
- (38) One (1) Dryer Mill, identified as 30G1, constructed in 1987, with emissions controlled by baghouse 30F15, exhausting to stack 84;
- (39) One (1) Product Transfer to Bins #14 & #15, identified as 41C30, constructed in 1987, with emissions controlled by baghouses 41F14 and 41F15, exhausting to stack 85;
- (40) One (1) Product Transfer to Bins #17, #18, and #44 identified as 41C35, constructed in 1987, with emissions controlled by baghouses 41F20, 41F21, and 41F54, exhausting to stack 86;
- (41) One (1) Product Bin #14, identified as 41V14, constructed in 1987, with emissions controlled by baghouse 41F16, exhausting to stack 87;
- (42) One (1) Product Bin #15, identified as 41V15, constructed in 1987, with emissions controlled by baghouse 41F17, exhausting to stack 88;
- (43) One (1) Product Bin #17, identified as 41V17, constructed in 1987, with emissions controlled by baghouse 41F22, exhausting to stack 89;
- (44) One (1) Product Bin #18, identified as 41V18, constructed in 1987, with emissions controlled by baghouse 41F23, exhausting to stack 90;
- (45) One (1) Belts Product Conveying Mill Product to Bins #3, #4, and #5, identified as 7F25, constructed in 1966, with emissions controlled by 7F25, exhausting to stack 103;

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

SECTION D.6

FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]: Starch Drying and Handling Operations (continued)

- (46) One (1) Belts Product Conveying Mill Product to Bins #1, #2, and #3, identified as 7F26, constructed in 1966, with emissions controlled by baghouse 7F26, exhausting to stack 104;
- (47) One (1) Product Bin #5, identified as 7V46, constructed in 1966, with emissions controlled by baghouse 7F69, exhausting to stack 105;
- (48) One (1) Product Bin #4, identified as 7V47, constructed in 1966, with emissions controlled by baghouse 7F70, exhausting to stack 106;
- (49) One (1) Product Bin #3, identified as 7V48, constructed in 1966, with emissions controlled by baghouse 7F71, exhausting to stack 107;
- (50) One (1) Product Bin #2, identified as 7V49, constructed in 1966, with emissions controlled by baghouse 7F72, exhausting to stack 108;
- (51) One (1) Product Bin #1, identified as 7V50, constructed in 1966, with emissions controlled by baghouse 7F73, exhausting to stack 109;
- (52) One (1) Belt Dryer Mill, identified as 25G1, constructed in 1968, with emissions controlled by baghouse 25F2, exhausting to stack 146;
- (53) One (1) Pneumatic Conveying to Mill Feed Receiver, identified as 25F1, constructed in 1968, with emissions controlled by baghouse 25F1, exhausting to stack 147;
- (54) One (1) Regular Belt Dryer D4 and one (1) Special Belt Dryer D5, identified as 16D4 and 16D5, constructed in 1966, with emissions controlled by rotoclone scrubbers 16F26, 17F78, 16F27, and 17F79, exhausting to stack 177;
- (55) One (1) Spray Agglomeration System, identified as 50D101, constructed in 2001, a heat input capacity of 6.2 MMBtu/hr, with emissions controlled by integral product collector/cyclones 50F111 and 50F112 and baghouse 50F102, exhausting to stack 349; and
- (56) One (1) Agglomeration Blender Receiver/Baghouse, identified as 50F106, constructed in 2001, with emissions controlled by baghouse 50F106, exhausting to stack 350;

(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.6.1 Prevention of Significant Deterioration [40 CFR 52.21] [326 IAC 2-2]

- (a) Pursuant to CP 157-9182-00003, issued April 2, 1998, A 157-10447-00003, issued October 26, 1999, A 157-15029-00003, issued October 24, 2001, and SSM 157-14974-00003, issued December 17, 2002, the PM emissions from facilities 43D71, 40G88, 7V23, 7V34, 7V35, 7V91, and 7V92 are limited as indicated in the table below:

<u>Facility</u>	<u>Stacks</u>	<u>PM/PM10 Limit (pounds per hour)</u>	<u>PM/PM10 Limit (tons per 12 mo)</u>
Starch Flash Dryer #3 (43D71)	265	7.54	33.0
Flash #3 Mill (40G88)	266	0.23	0.99
Starch Product Bins (7V23, 7V34, 7V35, 7V91, 7V92)	267, 268, 269, 345, 346	0.2 each	0.89 each

*12 mo - Twelve consecutive month period with compliance determined at the end of each month.

Compliance with these limits will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable.

- (b) Pursuant to SSM 157-14974-00003, issued December 17, 2002, and CP 157-1872-00003, issued on August 10, 1990, amended on November 1, 1991:
- (1) The PM/PM10 emissions from the Starch Flash Dryer #2 (40D20) shall not exceed 3.30 pounds per hour. Compliance with this limit, and the on-stream time limit below, is equivalent to PM/PM10 emissions of less than 12.5 tons per year.
 - (2) The PM/PM10 emissions from Starch Grinder/Mill #1 (40G20) shall not exceed 0.22 pounds per hour. Compliance with this limit, and the on-stream time limit below, is equivalent to PM/PM10 emissions of less than 0.83 tons per year.
 - (3) The PM/PM10 emissions from Starch Grinder/Mill #2 (40G21) shall not exceed 0.22 pounds per hour of PM or PM-10. Compliance with this limit, and the on-stream time limit below, is equivalent to PM/PM10 emissions of less than 0.83 tons per year.
 - (4) On-stream time for the #2 Flash Dryer System (consisting of 40D20, 40G20, 40G21, and 40F27) and bins 7V20, 7V21, 7V22, and 7V23 shall be limited to 7534 hours of operation per twelve consecutive month period with compliance determined at the end of each month. The "on-stream time" is the amount of time that the #2 Flash Dryer System's dryer starch feed conveyor and the Starch Flash Dryer #2 (40D20) fan are both in operation.
 - (5) The Grinder Feed Collector (40F27) shall vent to the intake of the Starch Storage and Transfer Bin System.
 - (6) Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the flow rate of the wet scrubber controlling Starch Flash Dryer #2 shall be maintained at a minimum of 300 gallons of liquid per minute.
 - (7) Only one of bins 7V20, 7V21, 7V22, and 7V23 shall be loaded at any one time.
- Compliance with these limits will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable.
- (c) Pursuant to CP (79) 1599, issued February 28, 1986, and OP 79-10-90-0406, issued October 16, 1987, the PM emissions from 40D1 shall not exceed 1.2 lb/hr and 5.3 tons per twelve month consecutive period with compliance determined at the end of each

month. Compliance with this limit shall render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable.

- (d) Pursuant to A 157-6180-00003, issued on August 12, 1996, and CP 157-4569-00003, issued September 21, 1995:

- (1) The PM/PM10 emissions from 43V90 shall not exceed 1.2 lb/hr;

Compliance with these limits is equivalent to total PM/PM10 emissions of less than 15 tons per year and will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable.

D.6.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, particulate emissions from facilities 40D1, 40F7, 7V8, 7V9, 40D20, 7V20, 7V21, 7V22, 40G20, 40G21, 43D71, 40G88, 7V23, 7V34, 7V35, 43V90, 7V91, 7V92, 41F210, 41G200, 41V10, 41V11, 41G201, 41F201, 33V44, 41F13, 30D1, 30F13, 30G1, 41C30, 41C35, 41V14, 41V15, 41V17, 41V18, 7F25, 7F26, 7V46, 7V47, 7V48, 7V49, 7V50, 25G1, 25F1, 16D4, 16D5, 50D101, and 50F106 shall be limited using one of the following equations (as applicable):

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

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

Or depending on the process weight rate:

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

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

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughput of the respective facilities is treated as confidential.

- (b) Pursuant to CP 157-5294-00003, issued September 5, 1996, A157-6170-00003, issued July 26, 1996, A 157-6571-00003, issued October 3, 1996, and in order to comply with 326 IAC 6-3-2:

- (1) The PM-10 emissions from facilities 41F210, 41G200, 41V10, 41V11, 41G201, 41F201, 41F13, 30D1, 30F13, 30G1, 41C30, 41C35, 41V14, 41V15, 41V17, 41V18, AND 33V44 are limited as indicated in the table below:

<u>Facility</u>	<u>Stack</u>	<u>PM-10 emission limit (pounds per hour)</u>	<u>PM-10 emission limit (tons per 12 mo)</u>
Pneumatic Product Transfer Roll Dryer 41F210	95	0.21	0.94
Roll Dryer Mill 41G200	96	0.28	1.22
Product Bin #10 (41V10) and Product Bin #11 (41V11)	97 98	0.03	0.14

<u>Facility</u>	<u>Stack</u>	<u>PM-10 emission limit (pounds per hour)</u>	<u>PM-10 emission limit (tons per 12 mo)</u>
Roll Dryer Mill 41G201	100	0.39	1.69
Pneumatic Product Transfer to Roll Dryer 41G201	101	0.3	1.3
Bulk Bag Dump Station (41F13)	344	0.03	0.11
Spray Dryer (30D1)	82	4.45	19.49
Product Transfer to Milling (30F13)	83	0.07	0.31
Dryer Mill (30G1)	84	0.95	4.17
Product Transfer to Bins #14, #15 (41C30), Product Transfer to Bins #17, #18 and #44	85 86	0.13	0.57
Product Bin #14 (41V14), Product Bin #15 (41V15), Product Bin #17 (41V17) and Product Bin #18 (41V18)	87 88 89 90	0.02	0.22
Product Bin #44 (33V44)	285	0.05	

*12 mo - Twelve consecutive month period with compliance determined at the end of each month.

(2) The opacity from facilities 41F210, 41G200, 41F201, 41G201, and 33V44 shall not exceed zero percent (0%).

(c) Pursuant to MSM 157-11907-00003, issued May 16, 2000, and in order to ensure compliance with 326 IAC 6-3-2, the allowable PM emission rate from facilities 50D101 and 50F106 shall not exceed 1.10 and 0.10 pounds per hour, respectively.

D.6.3 Volatile Organic Compounds: Best Available Control Technology [326 IAC 8-1-6] [40 CFR 52.21] [326 IAC 2-2]

Pursuant to 326 IAC 8-1-6, and CP 157-10232-00003, issued October 12, 1999:

(a) The combined propylene oxide input to facilities (listed in Section D.5) 40V1, 40U2, 40Y1, 40V50, 40V20, 40V21, 40V15, 40V16, 40F51, 40F52, 40F53, 40F54, 40U23, 43V71, 43V72, 43F71, 43F72, 43F73, 43V85, 43V86, 45V117, 45V118, 45V119, 45V120, 30V1, 30V2, 40V12, 40V11, 40V14, 45V223, 45V240, 45V241, 45V242, 45V243, 45V246, 45V247, 45V248, 45V270, 45V271, 45V280, 45V281, (listed in Section D.6) 40D1, 40D20, 43D71, 41D1, 41D2, 41D3, 41D4, 41D5, 41D6, 41D7, 41D8, 30D1, 16D4, and 16D5 shall not exceed 15,000 tons per twelve consecutive month period with compliance determined at the end of each month.

(b) The VOC emissions from scrubber 45F212, controlling emissions from facilities 45V223, 45V240, 45V241, 45V242, 45V243, 45V246, 45V247, 45V248, 45V270, 45V271, 45V280, and 45V281, shall not exceed 3.25 lb per 100,000 lb of acid-killed starch and 6.0 lb per 100,000 lb of non-acid-killed starch (equivalent to a minimum 95% overall control efficiency).

Compliance with these limitations is equivalent to total VOC emissions of less than 5.15 tons per year, will satisfy the requirements of 326 IAC 8-1-6, and render the requirements of 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration) not applicable.

D.6.4 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.6.5 Particulate Control

- (a) In order to comply with Conditions D.6.1 and D.6.2, baghouses, including those integral to the process, 40F7, 7F8, 7F9, 7F20, 7F21, 7F22, 40F28, 40F29, 7F33, 7F34, 7F35, 40F88, 43F90, 7F91, 7F92, 41F210, 41G200, 41F1, 41F2, 41F10, 41F11, 41F211, 41F201, 33F44, 41F13, 30F2, 30F3, 30F13, 30F15, 41F14, 41F15, 41F20, 41F21, 41F16, 41F17, 41F22, 41F23, 25F1, 25F2, 7F73, 7F72, 7F71, 7F70, 7F69, 7F26, 7F25, 50F102, and 50F106 for particulate control shall be in operation and control particulate emissions from facilities 40F7, 7V8, 7V9, 7V20, 7V21, 7V22, 40G20, 40G21, 40G88, 7V23, 7V34, 7V35, 43V90, 7V91, 7V92, 41F210, 41G200, 41V10, 41V11, 41G201, 41F201, 33V44, 41F13, 30D1, 30F13, 30G1, 41C30, 41C35, 41V14, 41V15, 41V17, 41V18, 7F25, 7F26, 7V46, 7V47, 7V48, 7V49, 7V50, 25G1, 25F1, 50D101, and 50F106 at all times those facilities are in operation.
- (b) Pursuant to CP 157-5294-00003, issued September 5, 1996, A 157-6571-00003, issued October 3, 1996, and in order to comply with Condition D.6.2, the particulate emissions from facilities 41F210, 41G200, 41V10, 41V11, 41G210, 41F201, 41F13, 30D1, 30F13, 30G1, 41C30, 41C35, 41V14, 41V15, 41V17, 41V18 and 33V44 shall be considered in compliance that:
- (1) The respective baghouses shall be operated at all times when the facilities are in operation. To facilitate compliance, opacity shall not exceed zero percent (0%).
 - (2) The Product Transfer to Bins #14, #15 (41C30), Product Transfer to Bins #17, #18, and #44 (41C35) shall not be operated simultaneously, and only one of the product storage bins (41V14, 41V15, 41V17, 41V18 and 33V44) shall be loaded at any one time.
 - (3) Only one of the Product Bins (41V10 or 41V11) shall be loaded at any one time.
- (c) In order to comply with Condition D.6.1 and Condition D.6.2, scrubbers 40F3, 40F26, 16F26, 17F78, 16F27, 17F79 and 43F80 for particulate control shall be in operation and control emissions from facilities 40D1, 40D20, 16D4, 16D5, and 43D71 at all times the respective facilities are in operation.

D.6.6 Testing Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

Pursuant to SSM 157-14974-00003, issued December 17, 2002, the Permittee shall perform PM and PM-10 testing on the Starch Flash Dryer #2 (40D20) and either Grinder Mill #1 (40G20) or Grinder Mill #2 (40G21) within 60 days after achieving the maximum production rate. Testing shall be completed utilizing methods approved by the Commissioner. If filterable PM10 is assumed to be 100% of filterable PM, only PM tests need to be performed. This testing is necessary to demonstrate compliance with Condition D.6.1(b) and shall be repeated at least once every five (5) years from the date of the valid compliance demonstration.

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

D.6.7 Visible Emissions Notations

- (a) Visible emission notations of the exhaust from stacks 265 and 177 shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the exhaust from stacks 73, 76, 77, 78, 105, 106, 107, 108, 109, 266, 267, 268, 269, 274, 286, 287, 345, 346, 349, and 350 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (c) For processes operated continuously, not including operations associated with 50D101 or 50F106, "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.
- (d) In the case of batch or discontinuous operations, not including operations associated with 50D101 or 50F106, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (e) 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.
- (f) The Compliance Response Plan for these units, not including 50D101 or 50F106, 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.
- (g) For units 50D101 and 50F106, when an abnormal emission is observed, the Permittee shall complete a Pollution Control Equipment Maintenance and Inspection Log sheet.

D.6.8 Monitoring for Scrubbers

- (a) A continuous monitoring system shall be installed and operated at all times scrubber 40F26 is in operation. The monitoring system shall continuously measure and record the scrubber recirculation rate from scrubber 40F26 controlling emissions from facility 40D20. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when any 1-hr average recirculation rate below 300 gallons per minute for any one reading. A flow rate reading that is below the minimum flow rate 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.
- (b) A continuous monitoring system shall be installed and operated at all times scrubber 43F80 is in operation. The monitoring system shall continuously measure and record the scrubber recirculation rate from scrubber 43F80 controlling emissions from facility 43D71. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when any 1-hr average recirculation rate is below 300 gallons per minute. A flow rate reading that is below the minimum flow rate 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.

- (c) The Permittee shall monitor the scrubber recirculation rate at least once per shift from scrubbers 40F3, 16F26, 17F78, 16F27, and 17F79 controlling emissions from facilities 40D1, 16D4, and 16D5. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when the flow rate readings are outside of the normal range, as specified by the manufacturer, for any one reading. A flow rate reading that is outside the normal 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.
- (d) The instruments used for determining the flow rate shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.6.9 Scrubber Inspections

- (a) An inspection of the scrubber controlling emissions from facilities 40D20 and 43D71 shall be performed at least semi-annually. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.
- (b) An inspection of the scrubbers controlling emissions from facilities 40D1, 16D4, and 16D5 shall be performed at least semi-annually. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.

D.6.10 Scrubber Malfunction

In the event that a scrubber malfunction has been observed:

- (a) The affected unit will be shut down immediately in accordance with safe operating procedures until the failed unit has been repaired or the appropriate components replaced”.
- (b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.6.11 Monitoring for Baghouses

- (a) The Permittee shall record the total static pressure drop across baghouses 40F88, 43F90, 7F73, 7F72, 7F71, 7F70, and 7F69, used in conjunction with facilities 40G88, 43V90, 7V46, 7V47, 7V48, 7V49, and 7V50, at least once per day when the respective facilities are in operation.
- (b) When, for any one reading, the pressure drop across the baghouses are outside the normal range of 3.0 and 6.0 inches of water or a range established during the last 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.
- (d) 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.6.12 Baghouse Inspections

- (a) An external inspection of all bags, controlling emissions from facilities 50D101, and 50F106, shall be performed at least semi-annually. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (b) An internal inspection of all bags, controlling emissions from facilities 50D101, 50F106, 40G88, 43V90, 7V46, 7V47, 7V48, 7V49, and 7V50, shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (c) Inspections shall also be performed before a respective baghouse that has been secured and tagged as being out of service is returned to service. All defective bags shall be replaced.

D.6.13 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. 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 deviation from this permit. If operations continue after bag failure has been observed and it will be 10 (ten) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, not including baghouses 50F102 and 50F106, 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).
- (c) The affected compartments of baghouses 50F102 and 50F106 will be shut down immediately until the failed units have been repaired or replaced. If appropriate, an investigation regarding the cause of bag failure will be conducted and an appropriate response will be initiated within 24 hours of discovery.

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

D.6.14 Record Keeping Requirements

- (a) To document compliance with Condition D.6.1(b), records shall be made and kept of the:
 - (1) Scrubbant flow rate for the wet scrubber controlling emissions from facility 40D20.
 - (2) On-stream time for 40D20, 40G20, 40G21, 40F27, and 7V20 through 7V23 per calendar month.

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

- (b) To document compliance with Condition D.6.3, the Permittee shall maintain monthly records of the input propylene oxide to facilities 40V1, 40U2, 40Y1, 40V50, 40V20, 40V21, 40V15, 40V16, 40F51, 40F52, 40F53, 40F54, 40U23, 43V71, 43V72, 43F71, 43F72, 43F73, 43V85, 43V86, 45V117, 45V118, 45V119, 45V120, 30V1, 30V2, 40V12, 40V11, 40V14, 45V223, 45V240, 45V241, 45V242, 45V243, 45V246, 45V247, 45V248, 45V270, 45V271, 45V280, 45V281, 40D1, 40D20, 43D71, 41D1, 41D2, 41D3, 41D4, 41D5, 41D6, 41D7, 41D8, 30D1, 16D4 and 16D5. This record is the same record as required in Condition D.5.15(b).
- (c) A log of the information necessary to document compliance with Condition D.6.5 shall be maintained.
- (d) The maximum production capacity of the #2 Flash Dryer System is treated as confidential and shall be kept at the emission source for the life of the facility.
- (e) To document compliance with Condition D.6.7, the Permittee shall maintain records of the visible emission notations of the stack exhaust.
- (f) To document compliance with Conditions D.6.8(a) and D.6.8(b), the Permittee shall maintain records of the scrubber recirculation rate as read by the continuous monitor for 40F26 and 43F80.
- (g) To document compliance with Condition D.6.8(c), the Permittee shall maintain records of the scrubber recirculation rate at least once per shift from scrubbers 40F3, 16F26, 17F78, 16F27, and 17F79 controlling emissions from facilities 40D1, 16D4, and 16D5.
- (h) To document compliance with Condition D.6.11, the Permittee shall maintain records of the total static pressure drop during normal operation.
- (i) To document compliance with Condition D.6.9 and D.6.12, the Permittee shall maintain records of the results of the inspections
- (j) A record shall be kept of the number of filters replaced from the baghouses controlling emissions from facilities 7V20, 7V21, 7V22, 7V23, 7V34, 7V35, 7V90, and 7V91 in order to document compliance with Condition D.6.1(b).
- (k) To document compliance with Condition D.6.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (l) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.15 Reporting Requirements

A quarterly summary of the information used to document compliance with Conditions D.6.1(b) and D.6.3 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Note that the report for Condition D.6.3 is the same report as required in Condition D.5.16(b).

SECTION D.7

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Starch Packaging and Loadout Operations

- (g) Starch Packaging and Loadout Operations, consisting of:
- (1) One (1) Product Bin #6 and Cyclonic Product Collector, identified as 17V6 and 17F5, constructed in 1984, with emissions controlled by baghouse 17F6, exhausting to stack 190;
 - (2) One (1) Product Transfer to Main Packer #1, identified as 16F5, constructed in 1966, with emissions controlled by baghouse 16F5, exhausting to stack 102;
 - (3) One (1) Cationic Product Receiver for Packer #1, identified as 17F27, constructed in 1966, with emissions controlled by baghouse 17F27, exhausting to stack 102;
 - (4) One (1) Packer #1, identified as 17Z38, constructed in 1966, with emissions controlled by baghouse 17F10, exhausting to stack 177;
 - (5) One (1) Reprocess Bag/Tote Dump, identified as 17U58, constructed in 1997, with emissions controlled by baghouse 17F58, exhausting indoors to stack 334;
 - (6) One (1) Bag Packer #2 House Dust Collector, identified as 17F2, constructed in 1995, with emissions controlled by baghouse 17F2, exhausting to stack 177;
 - (7) One (1) Bag Packer #2, identified as 17Z01, constructed in 1995, with emissions controlled by baghouse 17F01, exhausting to stack 177;
 - (8) One (1) Spray Dryer Product Transfer to Bag Packer #3, identified as 41F7, constructed in 1986, with emissions controlled by baghouse 41F7, exhausting to stack 184;
 - (9) One (1) Spray Dryer Product Starch Bag Packer (North Spouts Packer #3), identified as 41Z3, constructed in 1986, with emissions controlled by baghouse 41F7, exhausting to stack 184;
 - (10) One (1) Roll Dried & Dry Starch Reaction System Products Malto Product Transfer to Bag Packer #3, identified as 41F18, constructed in 1986, with emissions controlled by baghouse 41F18, exhausting to stack 186;
 - (11) One (1) Roll Dried & Dry Starch Reaction System Products Malto Bag Packer (South Spouts Packer #3), identified as 41Z5, constructed in 1986, with emissions controlled by baghouse 41F18, exhausting to stack 186;
 - (12) One (1) Bag Packer #4, identified as 17Z03, constructed in 1995, with emissions controlled by baghouses 17F03 and 17F04, exhausting to stack 332;
 - (13) One (1) House Dust Collection System for Bag Packer #4, identified as 17F15, constructed in 1995, with emissions controlled by baghouse 17F15, exhausting to stack 333;
 - (14) One (1) Bag Packer #3 House, identified as 41F44, constructed in 1995, with emissions controlled by baghouse 41F44, exhausting to stack 256;

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

SECTION D.7 FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]: Starch Packaging and Loadout Operations (continued)

- (15) One (1) Product Transfer for #1 Bulk Bagger, identified as 16F25, constructed in 1988, with emissions controlled by baghouse 16F25, exhausting to stack 191;
- (16) One (1) Bulk Bagger #2, identified as 17Z14, constructed in 1996, with emissions controlled by baghouse 17F14, exhausting to stack 254;
- (17) Three (3) Product Receivers for #3 Bulk Bagger, identified as 41F8, 41F81, and 41F82, constructed in 1988, 1997, and 1997 respectively, with emissions controlled by baghouses 41F8, 41F81, and 41F82, exhausting to stack 208;
- (18) One (1) Bulk Starch Rail Loadout (Track #10), identified as 20F60, constructed in 1993, with emissions controlled by baghouse 20F60, exhausting to stack 79;
- (19) One (1) Starch Truck/Rail Loadout, identified as 20F61, constructed in 1966, with emissions controlled by baghouse 20F61, exhausting to stack 135;
- (20) One (1) J4 Starch Rail Loadout System, identified as 16F100, constructed in 1989, with emissions controlled by baghouse 16F100, exhausting to stack 183;
- (21) One (1) Dextrin/Roll/Spray Cooked Starch Bulk Truck Loadout, identified as 41F6, constructed in 1988, with emissions controlled by baghouse 41F6, exhausting to stack 189;
- (22) One (1) Pneumatic Truck Loadout, identified as Truck Loadout, constructed in 1997, with emissions controlled by baghouses 20F78 and 20F79, exhausting to stack 264;
- (23) One (1) Bulk #1 Product Screening System, identified as 20F1, constructed in 1997, with emissions controlled by baghouse 20F1, exhausting to stack 330;
- (24) One (1) Bulk #2 Product Screening System, identified as 20F50, constructed in 1997, with emissions controlled by baghouse 20F50, exhausting to stack 331; and

(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.7.1 Prevention of Significant Deterioration [326 IAC 2-2] [40 CFR 52.21]

Pursuant to SSM 157-14974-00003, issued December 17, 2002, and CP 157-1872-00003, issued on August 10, 1990, amended on November 1, 1991:

- (a) The PM/PM10 emissions from facility 20F60 shall not exceed 0.15 pounds per hour. Compliance with this limit, and the on-stream time limit below, is equivalent to PM/PM10 emissions of less than 0.33 tons per year.
- (b) On-stream time for facility 20F60 shall not exceed 4380 hours of operation per twelve consecutive month period with compliance determined at the end of each month. For this facility, the "on-stream time" is defined as the amount of time that the loadout blower is in operation.

Compliance with these limitation renders the requirements of 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration) not applicable.

D.7.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, particulate emissions from facilities 17V6, 17F5, 16F5, 17F27, 17Z38, 17U58, 17Z01, 17F2, 41F7, 41Z5, 41F18, 41Z3, 41F44, 17Z03, 17F15, 16F25, 17Z14, 41F8, 41F81, 41F82, 20F60, 20F61, 16F100, 41F6, 20F78, 20F79, 20F1, and 20F50 shall be limited using one of the following equations (as applicable):

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

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

Or depending on the process weight rate:

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

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

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughputs of the respective facilities is treated as confidential.

- (b) Pursuant to CP 157-4160-00003, issued April 5, 1995, and in order to ensure compliance with 326 IAC 6-3-2, the PM emissions from facilities 17Z01, 17F2, 17Z14, and Truck Loadout, are limited as indicated in the table below:

Facility	Stack	PM emission limit (tons per 12 mo)
Bag Packer #2 (17Z01)	177	0.77
House Dust Collector Bag Packer #2 (17F2)	177	4.81
Bulk Bagger #2 (17Z14)	254	0.39
Pneumatic Truck Loadout (Truck Loadout)	264	0.64

*12 mo - Twelve consecutive month period with compliance determined at the end of each month.

- (c) Pursuant to CP 157-5294-00003, issued September 5, 1996, A 157-6571-00003, issued October 3, 1996, revised through the Part 70 permit, and in order to comply with 326 IAC 6-3-2, the particulate matter emissions from facilities 41F7, 41Z5, 41F18, 41Z3, 41F8, 41F81, 41F82, and 41F6 are limited as indicated in the table below:

<u>Facility</u>	<u>Stack</u>	<u>PM10 emission limit (pounds per hour)</u>	<u>PM10 emission limit (tons per 12 mo)</u>
Spray Dryer Product Transfer to Bag Packer #3 (41F7) and Spray Dryer Products Starch Bag Packer #3 North Sprouts Packer #3 (41Z3)	184	0.12	0.80
Roll Dried & Dry Starch Reaction System Product Transfer to Bag Packer #3 (41F18) and Roll Dried & Dry Starch Reaction System Products Bag Packer (South Spouts Packer #3) (41Z5)	186	0.18	
Product Transfer System for #3 Bulk Bagger (41F8, 41F81, and 41F82)	208	0.11	0.50
Dextrin/Roll/Spray Cooked Starch Bulk Truck Loadout (41F6)	189	0.04	0.18

*12 mo - Twelve consecutive month period with compliance determined at the end of each month.

- (d) Pursuant to E 157-8071-00003, issued February 7, 1997, the PM emissions from 20F1 and 20F50 are each limited to 1.0 pounds per hour to ensure compliance with 326 IAC 6-3-2.
- (e) Pursuant to CP 157-4569-00003, issued September 21, 1995, and A 157-6180-00003:
 - (1) The PM emissions from 17Z03 (controlled by baghouses 17F15, 17F03 and 17F04) shall not exceed 2.2 pounds per hour (equivalent to less than or equal to 9.63 tons per year) to ensure compliance with 326 IAC 6-3-2.
 - (2) Only one of the baghouses, 17F03 or 17F04, shall be operated at a time.

D.7.3 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 their baghouses.

Compliance Determination Requirements

D.7.4 Particulate Control

- (a) In order to comply with Condition D.7.1 and Condition D.7.2, baghouses, including those integral to the process, 17F6, 17F5, 16F5, 17F27, 17F10, 17F58, 17F01, 17F2, 41F7, 41F18, 41F44, 17F03, 17F04, 17F15, 16F25, 17F14, 41F8, 41F81, 41F82, 20F60, 20F61, 16F100, 41F6, 20F78, 20F79, 20F1, and 20F50 for particulate control shall be in operation and control particulate emissions from facilities 17V6, 17F5, 16F5, 17F27, 17Z38, 17U58, 17Z01, 17F2, 41F7, 41Z5, 41F18, 41Z3, 41F44, 17Z03, 17F15, 16F25, 17Z14, 41F8, 41F81, 41F82, 20F60, 20F61, 16F100, 41F6, Truck Loadout, 20F1, and 20F50 at all times those facilities are in operation.
- (b) Pursuant to CP 157-5294-00003, issued September 5, 1996, A 157-6571-00003, issued

October 3, 1996, and in order to comply with Condition D.7.1, the particulate emissions from facilities 41F7, 41Z5, 41F18, 41Z3, 41F8, 41F81, 41F82, and 41F6 shall be considered in compliance that:

- (1) the respective baghouses shall be operated at all times when the facilities are in operation. To facilitate compliance, opacity shall not exceed zero percent (0%); and
- (2) only one of the tote packer product receivers (41F8, 41F81, and 41F82) shall be operated at any one time.

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

D.7.5 Visible Emissions Notations

- (a) Visible emission notations of the exhaust from stacks 177, 333, and 256 shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the exhaust from stacks 79, 190, 102, 135, and 183 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (c) 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.
- (d) 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.
- (e) 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.
- (f) 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.7.6 Monitoring for Baghouses

- (a) The Permittee shall record the total static pressure drop across baghouses 17F10, 17F01, 41F44, and 17F15, used in conjunction with facilities 17Z38, 17Z01, 41F44, and 17F15, at least once per shift when the respective facilities are in operation.
- (b) The Permittee shall record the total static pressure drop across baghouses 17F6, 16F5, 17F27, 20F60, 20F61 and 16F100, used in conjunction with facilities 17V6, 17F5, 17F27, 20F60, 20F61, and 16F100, at least once per day when the respective facilities are in operation.
- (c) When, for any one reading, the pressure drop across the baghouses are outside the normal range of 3.0 and 6.0 inches of water or a range established during the last 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.

- (d) 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.7.7 Baghouse Inspections

- (a) An external inspection of all bags, controlling emissions from 20F60, shall be performed at least semi-annually. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (b) An external inspection of all bags, controlling particulate emissions from facilities 17Z38, 17Z01, 41F44, and 17F15, shall be performed at least once per calendar quarter. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (c) An internal inspection of all bags, controlling particulate emissions from facilities 20F60, 17Z38, 17Z01, 41F44, 17F15, 17V6, 17F5, 17F27, 20F61, and 16F100, shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (d) Inspections shall also be performed before a respective baghouse that has been secured and tagged as being out of service is returned to service. All defective bags shall be replaced.

D.7.8 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. 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 deviation from this permit. If operations continue after bag failure has been observed and it will be 10 (ten) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (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 Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.9 Record Keeping Requirements

- (a) To document compliance with Condition D.7.1:
 - (1) Records shall be made and kept of the on-stream time for 20F60 per calendar month.
 - (2) The maximum production capacity of facility 20F60, is treated as confidential and shall be kept at the emission source for the life of the facility.
- (b) To document compliance with Condition D.7.5, the Permittee shall maintain records of visible emission notations of the stack exhaust.
- (c) To document compliance with Condition D.7.6, the Permittee shall maintain records of the total static pressure drop during normal operation.
- (d) To document compliance with Condition D.7.7, the Permittee shall maintain records of the results of the inspections.
- (e) To document compliance with Condition D.7.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.7.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.7.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the Aresponsible official@ as defined by 326 IAC 2-7-1(34).

SECTION D.8 FACILITY OPERATION CONDITIONS

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

- (h) Boiler support facilities, consisting of:
- (1) One (1) Boiler Ash Silo and Truck Loading, identified as 31V1, constructed in 1984, with emissions controlled by baghouse 31F1, exhausting to stack 199;
 - (2) One (1) Boiler Ash Pneumatic Transfer to Ash Silo, identified as 31F10, constructed in 1984, with emissions controlled by baghouse 31F22, exhausting to stack 200;
 - (3) One (1) Coal Storage Silo, identified as 31V3, constructed in 1984, with emissions controlled by baghouse 31F21, exhausting to stack 203;
 - (4) One (1) Coal Day Bin, identified as 31V4, constructed in 1984, with emissions controlled by baghouse 31F19, exhausting to stack 204;
 - (5) One (1) Coal Day Bin, identified as 31V5, constructed in 1984, with emissions controlled by baghouse 31F20, exhausting to stack 205;
 - (6) One (1) Utilities Lime Storage Silo, identified as 31V10, constructed in 1984, with emissions controlled by baghouse 31F18, exhausting to stack 201;

(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.8.1 Prevention of Significant Deterioration [326 IAC 2-2]

Pursuant to PSD (79) 1557, issued June 21, 1984, OP 79-08-89-0354, issued February 5, 1986, and in order to comply with the requirements of 326 IAC 2-2:

- (a) The PM emissions from the coal/ash handling system (facilities 31V1, 31F10, 31V3, 31V4, and 31V5) shall not exceed 0.51 pounds per hour, equivalent to less than or equal to 2.24 tons per year.

This limit, in conjunction with the limited PM emissions from boiler 31B1 (Condition D.9.1), is equivalent to combined PM emissions of less than or equal to 56.0 tons per year.

- (b) The particulate matter emissions from the coal/ash handling system (facilities 31V1, 31F10, 31V3, 31V4, and 31V5) shall be controlled by a bag filter providing at least a 99.9% collection efficiency.

D.8.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, particulate emissions from facilities 31V1, 31F10, 31V10, 31V3, 31V4, and 31V5 shall be limited using one of the following equations (as applicable):

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

Or depending on the process weight rate:

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

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

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughputs of the respective facilities is treated as confidential.

D.8.3 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 their control devices.

Compliance Determination Requirements

D.8.4 Particulate Control

In order to comply with Conditions D.8.1 and D.8.2, baghouses 31F1, 31F22, 31F18, 31F21, 31F19, and 31F20 for particulate control shall be in operation and control particulate emissions from facilities 31V1, 31F10, 31V10, 31V3, 31V4, and 31V5 at all times those facilities are in operation.

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

D.8.5 Visible Emissions Notations

- (a) Visible emission notations of the exhaust from stacks 199 and 200 shall be performed once per shift during normal daylight operations when the respective facilities are in operation. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the exhaust from stacks 201, 203, 204, and 205 shall be performed once per day during normal daylight operations when the respective facilities are in operation. 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.8.6 Monitoring for Baghouses

- (a) The Permittee shall record the total static pressure drop across baghouses 31F1 and 31F22, used in conjunction with facilities 31V1 and 31F10, at least once per shift when the respective facilities are in operation.
- (b) The Permittee shall record the total static pressure drop across baghouses 31F18, 31F21, 31F19, and 31F20, used in conjunction with facilities 31V10, 31V3, 31V4, and 31V5, at least once per day when the respective facilities are in operation.

- (c) When, for any one reading, the pressure drop across the baghouses are outside the normal range of 3.0 and 6.0 inches of water or a range established during the last 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.
- (d) 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.8.7 Baghouse Inspections

- (a) An external inspection of all bags, controlling particulate emissions from facilities 31V1 and 31F10, shall be performed at least once per calendar quarter. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (b) An internal inspection of all bags, controlling particulate emissions from facilities 31V1, 31F10, 31V10, 31V3, 31V4, and 31V5, shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (c) Inspections shall also be performed before a respective baghouse that has been secured and tagged as being out of service is returned to service. All defective bags shall be replaced.

D.8.8 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. 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 deviation from this permit. If operations continue after bag failure has been observed and it will be 10 (ten) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (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 2-7-5(3)] [326 IAC 2-7-19]

D.8.9 Record Keeping Requirements

- (a) To document compliance with Condition D.8.5, the Permittee shall maintain records of visible emission notations of the stack exhaust.
- (b) To document compliance with Condition D.8.6, the Permittee shall maintain records of the total static pressure drop during normal operation.
- (c) To document compliance with Condition D.8.7, the Permittee shall maintain records of the results of the inspections.
- (d) To document compliance with Condition D.8.3, the Permittee shall maintain of 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.9

FACILITY OPERATION CONDITIONS

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

- (i) Utility area, consisting of:
- (1) Three (3) natural gas or No. 2 fuel oil-fired Boilers, identified as 11B1, 11B2 and 11B3, each with a heat input capacity of 125 MMBtu/hr, constructed in 1966, with emissions uncontrolled, exhausting to stack 197;
 - (2) One (1) coal-fired Boiler, identified as 31B1, with a heat input capacity of 231 MMBtu/hr, constructed in 1984, with low-NO_x burners fueled by natural gas or No. 2 fuel oil, with emissions controlled by baghouse 31F2, exhausting to stack 202;

(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.9.1 Prevention of Significant Deterioration: Best Available Control Technology [326 IAC 2-2]

Pursuant to PSD (79) 1557, issued June 21, 1984, and OP 79-08-89-0354, issued February 5, 1986:

- (a) The controlled particulate matter (PM) emissions from boiler 31B1 shall not exceed 0.05 pounds per MMBtu heat input. Compliance with this limit, in conjunction with the limited PM emissions from the coal/ash handling system (31V1, 31F10, 31V3, 31V4, and 31V5) (Condition D.8.1), is equivalent to total PM emissions of less than 56.0 tons per year.
- (b) The sulfur dioxide (SO₂) emissions from boiler 31B1 shall not exceed 1.2 pounds per MMBtu heat input and 1,215 tons per 12 month consecutive period with compliance determined at the end of each month by burning low sulfur coal.
- (c) The nitrogen oxides (NO_x) emissions from boiler 31B1 shall not exceed 0.7 pounds per MMBtu and 782 tons per 12 month consecutive period with compliance determined at the end of each month by boiler feed method and combustion techniques.
- (d) The carbon monoxide (CO) emissions from boiler 31B1 shall not exceed 10.2 pounds per hour and 45 tons per 12 month consecutive period with compliance determined at the end of each month.
- (e) The volatile organic compounds (VOC) emissions from boiler 31B1 shall not exceed 1.1 pounds per hour and 5.0 tons per 12 month consecutive period with compliance determined at the end of each month.
- (f) Only one of the identical gas/oil-fired boilers (11B1, 11B2, or 11B3) will be operated when the coal-fired boiler, 31B1, is operating. The only exception is the period of time required to replace the operation of boiler 31B1 with the operation of the two remaining standby gas/oil boilers. In no case will this period of time exceed eight (8) hours.
- (g) Boilers 11B1, 11B2, or 11B3 will combust only natural gas when fired in conjunction with the coal-fired boiler (31B1).
- (h) In order to ensure compliance with (a) through (e) above, the total amount of coal consumed by boiler 31B1 and the average coal heating value shall be determined on a monthly basis with compliance determined, per twelve consecutive month period, at the end of each month.

Compliance with these requirements will satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

D.9.2 Particulate Matter (Sources of Indirect Heating) [326 IAC 6-2-3(d)]

Boilers 11B1, 11B2, and 11B3 were constructed in 1966. Therefore, pursuant to 326 IAC 6-2-3(d) the particulate matter emissions from boilers 11B1, 11B2, and 11B3 shall not exceed 0.8 pounds per MMBtu heat input each.

D.9.3 Particulate Matter (Sources of Indirect Heating) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate matter emissions from boiler 31B1, constructed in 1985, shall not exceed 0.21 pounds per MMBtu heat input.

This limitation is based on the following equation:

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

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used (Q = 606 MMBtu/hr).

D.9.4 Sulfur Dioxide [326 IAC 7-1.1-2] [326 IAC 7-2-1]

- (a) Pursuant to 326 IAC 7-1.1-2(a)(3), the sulfur dioxide emissions from each boiler (11B1, 11B2, and 11B3) shall not exceed 0.5 pounds per MMBtu heat input when combusting #2 fuel oil. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average. 326 IAC 7-1.1 and 326 IAC 7-2-1 are not federally enforceable.
- (b) Pursuant to 326 IAC 7-1.1-2(a)(1), the sulfur dioxide emissions from boiler 31B1 shall not exceed 6.0 pounds per MMBtu heat input when combusting coal. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average. 326 IAC 7-1.1 and 326 IAC 7-2-1 are not federally enforceable. Compliance with Condition D.9.1(b) will ensure compliance with 326 IAC 7-1.1.

D.9.5 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 baghouses.

Compliance Determination Requirements

D.9.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

No later than 36 months after issuance of this Part 70 permit, and in order to demonstrate compliance with Condition D.9.1, the Permittee shall perform PM testing on boiler 31B1 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.9.7 Particulate Control

In order to comply with Conditions D.9.1 and D.9.3, baghouse 31F2 for particulate control shall be in operation and control particulate emissions from facility 31B1 at all times facility 31B1 is in operation.

D.9.8 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 3-7-4]

Compliance with Condition D.9.4 shall be determined utilizing one of the following options:

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions from boilers 11B1, 11B2, and 11B3 do not exceed five-tenths (0.5) pound per million Btu heat input when combusting #2 fuel oil by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank used in conjunction with the boilers immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

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

D.9.9 Sulfur Dioxide (SO₂) Emissions Monitoring [326 IAC 3-5] [326 IAC 7-2-1(g)]

The Permittee shall install, maintain, calibrate and operate a continuous emission monitoring system (CEMS) for sulfur dioxide from boiler 31B1. This system shall be certified in accordance with 326 IAC 3-5-2 and 326 IAC 3-5-3. A standard operating procedure detailing quality assurance/quality control activities shall be submitted to the department for approval in accordance with 326 IAC 3-5-4. Relative accuracy tests and routine quarterly audits shall be performed in accordance with the contents of the standard operating procedures (SOP) pursuant to 326 IAC 3-5-5. The continuous emission monitor (CEM) results shall be used to determine compliance with the sulfur dioxide emissions limit on the basis of three-hour block periods. The continuous emission monitoring data shall be used to determine compliance with the sulfur dioxide emission limitations in Conditions D.9.1 and D.9.4 on the basis of three (3) hour block periods.

D.9.10 Nitrogen Oxides (NO_x) Emissions Monitoring [326 IAC 3-5] [326 IAC 3-5-1(d)]

The Permittee shall install, maintain, calibrate and operate a continuous emission monitoring system (CEMS) for nitrogen oxides from boiler 31B1. This system shall be certified in accordance with 326 IAC 3-5-2 and 326 IAC 3-5-3. A standard operating procedure detailing quality assurance/quality control activities shall be submitted to the department for approval in accordance with 326 IAC 3-5-4. Relative accuracy tests and routine quarterly audits shall be performed in accordance with the contents of the standard operating procedures (SOP) pursuant to 326 IAC 3-5-5. The continuous emission monitor (CEM) results shall be used to determine compliance with the nitrogen oxides emissions limit on the basis of a 30-day rolling average emission rate calculated each steam generating unit operating day as the average of all of the hourly nitrogen oxides emission data for the preceding thirty (30) steam generating unit operating days. The continuous emission monitoring data shall be used to determine compliance with the nitrogen oxide emission limitations in Conditions D.9.1 on the basis of a 30-day rolling average emission rate calculated each steam generating unit operating day as the average of all of the hourly nitrogen oxides emission data for the preceding thirty (30) steam generating unit operating days.

D.9.11 Continuous Opacity Monitoring [326 IAC 3-5]

Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), and 326 IAC 2, a continuous monitoring system shall be installed, calibrated, maintained, and operated to measure the opacity of the exhaust from boiler 31B1. The continuous opacity monitoring system shall meet the performance specifications of 326 IAC 3-5-2.

D.9.12 Opacity Readings

The ability of the continuous opacity monitor (COM) to monitor particulate emissions from boiler 31B1 shall be monitored by continuously measuring and recording the opacity of emissions from the stack exhaust.

- (a) Appropriate response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the opacity from the boiler exceeds twenty percent (20%) for any three (3) consecutive six-minute average period. 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.
- (b) The opacity shall be determined by the certified continuous opacity monitor required in Condition D.9.11.

D.9.13 Method 9 Opacity Readings and Visible Emissions Notations

- (a) Whenever a continuous opacity monitor (COM) is malfunctioning, the Permittee shall follow the procedures in accordance with Section C - Maintenance of Opacity Monitoring Equipment, until such time that the continuous opacity monitor is back in operation.
- (b) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed or whenever the opacity from a boiler exceeds twenty percent (20%) for any three (3) consecutive six-minute average periods. 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.9.14 SO₂ Monitor Downtime [326 IAC 2-7-6] [326 IAC 2-7-5(1)]

Whenever the SO₂ continuous emission monitor is malfunctioning or will be down for repairs or adjustments for a period of four (4) hours or more, a calibrated backup CEM shall be brought online within four (4) hours of shutdown of the primary CEM, if possible. If this is not possible, a fuel analysis, pursuant to 326 IAC 3-7-2(a) or (b), shall be conducted to allow for determination of compliance with all SO₂ emission limits.

D.9.15 Visible Emissions Notations

- (a) Visible emission notations of the exhaust from stack 197 (exhausting emissions from boilers 11B1, 11B2, and 11B3) shall be performed once per shift during normal daylight operations when fuel oil is fired in any one of the respective boilers. 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 these units 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.9.16 Baghouse Inspections

- (a) An external inspection shall be performed at least once per calendar quarter of all bags controlling the particulate emissions from facility 31B1. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (b) An internal inspection shall be performed at least once per calendar year of all bag controlling the particulate emissions from facility 31B1. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.9.17 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. 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 deviation from this permit. If operations continue after bag failure has been observed and it will be 10 (ten) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (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 2-7-5(3)] [326 IAC 2-7-19]

D.9.18 Record Keeping Requirements

- (a) To document compliance with Condition D.9.1, the Permittee shall maintain monthly records of the heating value and amount of coal consumed by boiler 31B1.
- (b) To document compliance with Condition D.9.4, the Permittee shall maintain records in accordance with (1) through (6) below.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and copies of all reports required by this permit.

- (c) To document compliance with Condition D.9.9 and D.9.10, the Permittee shall maintain records of the continuous emission monitoring data for SO₂ and NO_x in accordance with 326 IAC 3-5.
- (d) To document compliance with Conditions D.9.11 and D.9.12, the Permittee shall maintain records of the continuous opacity monitoring (COM) data in accordance with 326 IAC 3-5. Records shall be complete and sufficient to establish compliance with the limits established in this section. When the COM system is not functioning, the Permittee shall maintain records of visible emissions notations of the stack exhaust in accordance with Section C - Maintenance of Continuous Opacity Monitoring Equipment.
- (e) To document compliance with Condition D.9.15, the Permittee shall maintain records of once per shift visible emission notations of the stack exhaust when boilers 11B1, 11B2, or 11B3 are burning fuel oil.
- (f) To document compliance with Condition D.9.16, the Permittee shall maintain records of the results of the inspections.
- (g) To document compliance with Condition D.9.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (h) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.9.19 Reporting Requirements

- (a) The natural gas fired boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) A certification, signed by the responsible official, shall be submitted that certifies all of the fuels combusted during the twelve month period.

- (c) A quarterly summary of the information to document compliance with Condition D.9.1 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.10

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Anaerobic waste treatment system

- (j) One (1) Wastewater Treatment Anaerobic Digester, identified as 34V10, constructed in 1985, with emissions controlled by: a scrubber (34V11) and main flare (21Z1) which exhaust to stack 271, and an emergency flare (34Z1) which exhausts to stack 272. Note that the biogas is used by dryers 21D6 and 21D7 and if the biogas produced exceeds the dryers' capacity, then the gas is flared off.

(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.10.1 Prevention of Significant Deterioration [326 IAC 2-2] [40 CFR 52.21]

Pursuant to OP 79-08-89-0371, issued March 31, 1986:

- (a) The total quantity of biogas burned in feed dryers 21D6 and 21D7, the main flare (21Z1), and the emergency flare (34Z1) shall not result in total SO₂ emissions greater than or equal to 40 tons per twelve consecutive month period with compliance determined at the end of each month.
- (b) To determine compliance with Condition D.10.1(a), the hydrogen sulfide content of the biogas treated by the biogas scrubber (34V11), the temperature of the biogas at the time of testing, and the total amount of biogas treated by the scrubber (34V11) will be measured on a daily basis and used to calculate a daily sulfur dioxide emission rate. If the biogas is directed to the emergency flare (34Z1), the hydrogen sulfide content of the untreated biogas, the temperature of the untreated biogas at the time of testing, and the total amount of untreated biogas burned by the emergency flare (34Z1) will be measured on a daily basis and used to calculate a daily sulfur dioxide emission rate.
- (c) The Permittee shall notify the Air Pollution Control Board within two working days of any period if:
- (1) The sulfur dioxide emission rate exceeds 9.0 pounds per hour for more than three consecutive days; or
 - (2) Any H₂S is emitted directly to the atmosphere without being burned.

Compliance with these limits is equivalent to total SO₂ emissions from 34V10 of less than 40 tons per year and shall render the requirements of 326 IAC 2-2 not applicable.

D.10.2 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.10.3 Sulfur Dioxide (SO₂)

In order to comply with Condition D.10.1:

- (a) The scrubber (34V11), used to prevent SO₂ emissions by removing H₂S from biogas, shall be in operation at all times when biogas is produced from the anaerobic treatment system (34V10) and used by dryers 21D6 and 21D7.

- (b) The main flare (21Z1), used to control H₂S emissions from the exhaust of scrubber 34V11 shall be in operation at all times biogas is routed to scrubber 34V11.
- (c) When the amount of the biogas produced by anaerobic treatment system 34V10 exceeds the capacities of dryers 21D6, 21D7, and the main flare (21Z1), then the emergency flare (34Z1) shall operate to combust the biogas at all times when biogas may be vented to it.

D.10.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

No later than 36 months after issuance of this Part 70 permit, and in order to demonstrate compliance with Condition D.10.1, the Permittee shall perform SO₂ testing on flares 21Z1 and 34Z1 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 Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.10.5 Flare Pilot Flame

The presence of a flare pilot flame (for flares 21Z1 and 34Z1) shall be monitored using a thermocouple, or any other equivalent device, to detect the presence of a flame.

D.10.6 Monitoring for Scrubbers

- (a) The Permittee shall monitor the scrubber recirculation rate at least once per shift from scrubber 34V11 used to scrub the biogas from 34V10.
- (b) The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when the flow rate readings are outside of the normal range, as specified by the manufacturer, for any one reading. The Preventive Maintenance Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when the recirculation rate readings are outside of the normal range for any one reading. A flow rate reading that is outside the normal 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.
- (c) The instruments used for determining the flow rate shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.10.7 Scrubber Inspections

An inspection of scrubber 34V11 shall be performed annually. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.

D.10.8 Scrubber Malfunction

In the event that a scrubber malfunction has been observed:

- (a) The affected unit will be shut down immediately in accordance with safe operating procedures until the failed unit has been repaired or the appropriate components replaced".
- (b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

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

D.10.9 Record Keeping Requirements

- (a) To document compliance with Condition D.10.1, the Permittee shall maintain:
- (1) A log of the daily H₂S content, temperature, and the total amount of the biogas burned in the main flare (21Z1), feed dryers (21D6 and 21D7), or emergency flare (34Z1). The log shall be kept for at least the past twenty-four (24) month period; and
 - (2) Records of all calculations used to determine the SO₂ emissions from the combustion of biogas in the main flare (21Z1), feed dryers (21D6 and 21D7), and emergency flare (34Z1).
- (b) To document compliance with Condition D.10.6, the Permittee shall maintain once per shift records of the scrubber recirculation rate from scrubber 34V11.
- (c) To document compliance with Condition D.10.7, the Permittee shall maintain records of the results of the inspections.
- (d) To document compliance with Condition D.10.2, the Permittee shall maintain of 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.

D.10.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.10.1 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.11

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Specifically Regulated Insignificant Activities

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (c) Structural steel and bridge fabrication activities using 80 tons or less of welding consumables. [326 IAC 6-3-2]
- (d) Covered conveyors for coal or coke conveying of less than or equal to 360 tons per day. [326 IAC 6-3-2]
- (e) Uncovered coal conveying of less than or equal to 120 tons per day. [326 IAC 6-3-2]
- (f) Coal bunker and coal scale exhausts and associated dust collector vents. [326 IAC 6-3-2]
- (g) Vents from ash transport systems not operated at positive pressure. [326 IAC 6-3-2]
- (h) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM₁₀, 10 tons per year SO₂, NO_x, or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs: Corn Storage Silo Bins (13V1 through 13V5) and ten dewatering presses. [326 IAC 6-3-2]
- (i) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(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.11.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements; and
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.11.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^oC) (one hundred twenty degrees Fahrenheit (120^oF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.11.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, particulate emissions from the insignificant brazing equipment, cutting torches, soldering equipment, welding equipment, structural steel and bridge fabrication activities, coal and coke conveying, coal bunker, ash transport systems, corn storage silos and dewatering presses shall be limited using one of the following equations (as applicable):

Those activities with a process weight rate of less than 100 pounds per hour shall be limited to 0.551 pounds per hour;

Or depending on the process weight rate:

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

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

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughputs of the respective facilities is treated as confidential.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: A.E. Staley Manufacturing Company - Sagamore Plant
Source Address: 2245 North Sagamore Parkway, Lafayette, IN 47902
Mailing Address: 2200 E. Eldorado St., Decatur, IL 62521
Part 70 Permit No.: T157-6009-00003

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: A.E. Staley Manufacturing Company - Sagamore Plant
Source Address: 2245 North Sagamore Parkway, Lafayette, IN 47902
Mailing Address: 2200 E. Eldorado St., Decatur, IL 62521
Part 70 Permit No.: T157-6009-00003

This form consists of 2 pages

Page 1 of 2

<p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section**

**PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: A.E. Staley Manufacturing Company - Sagamore Plant
Source Address: 2245 North Sagamore Parkway, Lafayette, IN 47902
Mailing Address: 2200 E. Eldorado St., Decatur, IL 62521
Part 70 Permit No.: T157-6009-00003

<input checked="" type="checkbox"/> Natural Gas Only
<input checked="" type="checkbox"/> Alternate Fuel burned
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: _____
Phone: _____
Date: _____

(reproduce this form as necessary)

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY Compliance Data Section

Part 70 Quarterly Report

Source Name: A.E. Staley Manufacturing Company - Sagamore Plant
 Source Address: 2245 North Sagamore Parkway, Lafayette, IN 47902
 Mailing Address: 2200 E. Eldorado St., Decatur, IL 62521
 Part 70 Permit No.: T157-6009-00003
 Facility: Starch production facilities 40V1, 40U2, 40Y1, 40V50, 40V20, 40V21, 40V15, 40V16, 40F51, 40F52, 40F53, 40F54, 40U23, 43V71, 43V72, 43F71, 43F72, 43F73, 43U74, 43V85, 43V86, 45V117, 45V118, 45V119, 45V120, 30V1, 30V2, 40V12, 40V11, 40V14, 45V223, 45V240, 45V241, 45V242, 45V243, 45V246, 45V247, 45V248, 45V270, 45V271, 45V280, 45V281, 40D1, 40D20, 43D71, 41D1, 41D2, 41D3, 41D4, 41D5, 41D6, 41D7, 41D8, 30D1, 16D4 and
 Parameter: Propylene oxide (PO) input
 Limit: Fifteen thousand (15,000) tons propylene oxide per twelve consecutive month period with compliance determined at the end of each month.

YEAR:

Month	VOC Usage	VOC Usage	VOC Usage
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on:

Submitted by:
 Title / Position:
 Signature:
 Date:
 Phone:

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: A.E. Staley Manufacturing Company - Sagamore Plant
 Source Address: 2245 North Sagamore Parkway, Lafayette, IN 47902
 Mailing Address: 2200 E. Eldorado St., Decatur, IL 62521
 Part 70 Permit No.: T157-6009-00003
 Facilities: 40D20, 40G20, 40G21, 40F27, and 7V20 through 7V23
 Parameter: On-stream time (hours of operation)
 Limit: 7534 hours per twelve consecutive month period with compliance determined at the end of each month.

Months: _____ to _____ Year: _____

Month	On-stream time	On-stream time	On-stream time
	This Month	Previous 11 Months	12 Month Total

9 No deviation from the limit occurred in this quarter.

9 Deviations occurred in this quarter.
 Deviation has been reported on:

Submitted by:
 Title / Position:
 Signature:
 Date:
 Phone:

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: A.E. Staley Manufacturing Company - Sagamore Plant
 Source Address: 2245 North Sagamore Parkway, Lafayette, IN 47902
 Mailing Address: 2200 E. Eldorado St., Decatur, IL 62521
 Part 70 Permit No.: T157-6009-00003
 Facility: Bulk Starch Railcar Loadout (20F60)
 Parameter: On-stream time (hours of operation)
 Limit: 4380 hours per twelve consecutive month period with compliance determined for the end of each month.

Months: _____ to _____ Year: _____

Month	On-stream time	On-stream time	On-stream time
	This Month	Previous 11 Months	12 Month Total

9 No deviation from the limit occurred in this quarter.

9 Deviations occurred in this quarter.
 Deviation has been reported on:

Submitted by:
 Title / Position:
 Signature:
 Date:
 Phone:

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: A.E. Staley Manufacturing Company - Sagamore Plant
 Source Address: 2245 North Sagamore Parkway, Lafayette, IN 47902
 Mailing Address: 2200 E. Eldorado St., Decatur, IL 62521
 Part 70 Permit No.: T157-6009-00003
 Facility: 34V10 (including flares 21Z1 and 34Z1) and dryers 21D6 and 21D7
 Parameter: biogas combusted
 Limit: The total quantity of biogas burned in feed dryers 21D6 and 21D7, the main flare (21Z1), and the emergency flare (34Z1), the main flare biogas limit shall be reduced be 200 MMSCF.

Months: _____ to _____ Year: _____

Month	SO ₂ emissions from biogas combusted in 21Z1, 21D6 and 21D7	SO ₂ emissions from biogas combusted in 34Z1	SO ₂ emissions from biogas combusted in 21Z1, 21D6 and 21D7	SO ₂ emissions from biogas combusted in 34Z1	SO ₂ emissions from biogas combusted in 21Z1, 21D6 and 21D7	SO ₂ emissions from biogas combusted in 34Z1
	This Month	This Month	Previous 11 Months	Previous 11 Months	12 Month Total	12 Month Total

9 No deviation from the limit occurred in this quarter.

9 Deviations occurred in this quarter.
 Deviation has been reported on:

Submitted by:
 Title / Position:
 Signature:
 Date:
 Phone:

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY Compliance Data Section

PART 70 OPERATING PERMIT QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: A.E. Staley Manufacturing Company - Sagamore Plant
Source Address: 2245 North Sagamore Parkway, Lafayette, IN 47902
Mailing Address: 2200 E. Eldorado St., Decatur, IL 62521
Part 70 Permit No.: T157-6009-00003

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name: A. E. Staley Manufacturing Company
Source Location: 2245 North Sagamore Parkway, Lafayette, IN 47904-1620
County: Tippecanoe
SIC Code: 2046
Part 70 Permit No.: 157-6009-00003
Issuance Date: December 31, 2003
Application No.: 157-19702-00003
Permit Reviewer: Allen R. Davidson

On July 8, 2004, the Office of Air Quality (OAQ) received an application from A. E. Staley Manufacturing Company relating to the operation of the Flash Dryer #3 Mill, identified as Unit 40G88. Maximum airflow will increase from 2,200 acfm to 3,300 acfm. Grain loading will remain at 0.008 gr/acf.

History

A. E. Staley Manufacturing Company was issued a Part 70 permit for a corn processing plant on December 31, 2003.

On April 14, 2004, the Office of Air Quality (OAQ) received an application from A. E. Staley Manufacturing Company relating to an increase in grind capacity and an expansion of the starch finishing system. That application, identified as Significant Source Modification (SSM) 157-18832-00003, is pending.

This application, which seeks a change which is unrelated to the changes being sought in SSM 157-18832-00003, will be the first revision to the Part 70 permit. The application seeks the following changes:

D.6.1 Prevention of Significant Deterioration [40 CFR 52.21] [326 IAC 2-2]

- (a) Pursuant to CP 157-9182-00003, issued April 2, 1998, A 157-10447-00003, issued October 26, 1999, A 157-15029-00003, issued October 24, 2001, and SSM 157-14974-00003, issued December 17, 2002, the PM emissions from facilities 43D71, 40G88, 7V23, 7V34, 7V35, 7V91, and 7V92 are limited as indicated in the table below:

<u>Facility</u>	<u>Stacks</u>	<u>PM/PM10 Limit (pounds per hour)</u>	<u>PM/PM10 Limit (tons per 12 mo)</u>
Starch Flash Dryer #3 (43D71)	265	7.54	33.0
Flash #3 Mill (40G88)	266	0.15 0.23	0.66 0.99
Starch Product Bins (7V23, 7V34, 7V35, 7V91, 7V92)	267, 268, 269, 345, 346	0.2 each	0.89 each

*12 mo - Twelve consecutive month period with compliance determined at the end of each month.

Compliance with these limits will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable.

[Items (b) through (d) remain unchanged.]

Enforcement Issues

IDEM received a letter from A. E. Staley dated August 5, 2004, disclosing that the company has exceeded sulfur dioxide emission limits placed on the wastewater treatment plant's biogas scrubber, identified as 34V11. The limits were placed to avoid the applicability of 326 IAC 2-2, and the exceeding of the limits constitute an alleged violation of 326 IAC 2-2. The Office of Enforcement is currently evaluating the severity of the alleged violation and will determine which enforcement actions to pursue.

Also, OAQ recently found evidence that A. E. Staley has exceeded carbon monoxide limits placed on Boiler 31B1, which is an alleged violation of 326 IAC 2-2. OAQ has referred the matter to OE, which will be responsible for pursuing enforcement actions.

Stack Summary

The existing stack information will be revised as follows:

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
266	Flash Dryer #3 Mill	70	0.67	3,300	120

No new stacks will be added to the emission source as a result of this modification.

Recommendation

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

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

An application for the purposes of this review was received on July 16, 2004.

Emission Calculations

See Appendix A of this document for detailed emissions calculations. (1 page)

Potential To Emit

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

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

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

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

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

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

The revision's potential to emit is follows:

Pollutant	Potential To Emit (tons/year)
PM	0.3
PM-10	0.3
SO ₂	0
VOC	0
CO	0
NO _x	0

HAP	Potential To Emit (tons/year)
TOTAL	0

The revision is being processed as a Significant Permit Modification under 326 IAC 2-7-12 because:

- (a) It is not classifiable as an administrative amendment under 326 IAC 2-7-11; and
- (b) It seeks to change federally enforceable conditions for which there is no corresponding requirement in 326 IAC which the applicant assumed to avoid 326 IAC 2-2. Thus, it expressly cannot be processed as a minor permit modification by 326 IAC 2-7-12(b)(1)(D).

This revision is not a major modification for Prevention of Significant Deterioration (PSD), 326 IAC 2-2, because

- (a) The increase in potential to emit every attainment pollutant is less than the PSD significant levels; and
- (b) Federally enforceable emission limits will not be increased to the point where 40 CFR 52.21(r)(4) becomes applicable.

Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

County Attainment Status

The source is located in Tippecanoe County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone (1-hour)	attainment
Ozone (8-hour)	attainment
CO	attainment
Lead	attainment

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

Federal Rule Applicability

There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this revision.

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

State Rule Applicability - Entire Source

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

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

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, this source is subject to 326 IAC 2-6 (Emission Reporting). The source also has potential to emit greater than the thresholds in 326 IAC 2-6-3(a)(1). Therefore, an emission statement covering the previous calendar year must be submitted by July 1 annually. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1-2 (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:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a

continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Flash Dryer #3 Mill (40G88)

This is an existing emission unit controlled by an existing particulate control device (baghouse 40F88), which vents to an existing stack identified as S/V 266. Maximum airflow will increase from 2,200 acfm to 3,300 acfm. Grain loading will remain at 0.008 gr/acf.

326 IAC 1-7 (Stack Height Provisions)

The existing stack is not subject to 326 IAC 1-7. It is not an exhaust gas stack through which a potential of twenty-five (25) tons per year or more of particulate matter will be emitted.

326 IAC 2-2 (Prevention of Significant Deterioration)

This emission unit was one of seven emission units approved under Construction Permit 157-9182-00003. That review included an analysis of contemporary increases and decreases over a contiguous five year period. Including the seven new units, 72.8 tons per year of PM-10 increases were totaled and 87.2 tons per year of PM-10 decreases were credited, indicating a net reduction of 14.4 tons per year of PM-10 emissions over the contemporary period. Increasing the limit on the Flash Dryer #3 Mill by 0.33 tons per year of PM-10 will have no effect on PSD rule applicability.

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

This emission unit is subject to 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2:

- (a) Particulate matter (PM) emissions shall be limited by the following equation for process weight rates up to sixty thousand (60,000) pounds per hour:

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

- (b) Particulate matter (PM) emissions shall be limited by the following equation for process weight rates greater than sixty thousand (60,000) pounds per hour:

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

Due to claims of confidentiality regarding process weight rates, the calculation does not appear in Appendix A - Emission Calculations. However, the control equipment shall be in operation at all times the emission unit is in operation, in order to comply with this rule.

Conclusion

The operation of the Flash Dryer #3 Mill shall be subject to the conditions of the attached Significant Permit Modification, No. 157-19702-00003.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	A. E. Staley Manufacturing Company
Source Location:	2245 North Sagamore Parkway, Lafayette, IN 47904-1620
County:	Tippecanoe
SIC Code:	2046
Operation Permit No.:	157-6009-00003
Issuance Date:	June 28, 2004
Revision No.:	157-19702-00003
Permit Reviewer:	Allen R. Davidson

On September 2, 2004, the Office of Air Quality (OAQ) had a notice published in the *Lafayette Journal & Courier* stating that A. E. Staley Manufacturing Company, a corn wet milling plant located at 2245 North Sagamore Parkway, Lafayette, IN 47904-1620, had applied for a Significant Permit Modification to the Part 70 Operating Permit. The application related to the operation of the Flash Dryer #3 Mill, identified as Unit 40G88. Maximum airflow would increase from 2,200 acfm to 3,300 acfm. Grain loading would remain at 0.008 gr/acf. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, OAQ has decided to make the following corrections:

- (a) All instances of "First Significant Permit Modification" in SPM 157-19702-00003 have been changed to read "Second Significant Permit Modification". SPM 157-18915-00003, which would allow the combustion of waste starch as fuel in Boiler 31B1, will be known as the First Significant Permit Modification.
- (b) "Page 76 of 117" has been changed to read "Page 76 of 119" to reflect the fact that SPM 157-18915-00003 adds two pages to Section D.9 in the permit.
- (c) Page 2 of the Technical Support Document states that OAQ recently found evidence that A. E. Staley has exceeded carbon monoxide limits placed on Boiler 31B1. This statement is incorrect and should be disregarded. The coal-fired boiler on which evidence indicates an alleged violation of carbon monoxide limits is located at A. E. Staley's South plant. There are no issues with carbon monoxide emissions from Boiler 31B1 at the Sagamore plant.

On October 1, 2004, OAQ received written comments from the Sierra Club Wildcat Group regarding the proposed permit and a request for a public hearing. In addition, two of the group's members submitted comments by email. One person submitted a written disapproval during the comment period against issuing the permit but did not offer comments regarding the permit itself. The summary of the comments and responses follows.

Comment 1a:

Increased flow through the 40G88 Flash Dryer #3 Mill will result in higher throughput on the 40F88 Baghouse and the 266 Stack, yielding higher particulate emissions to the atmosphere.

Comment 1b:

The 40G88 Flash Dryer #3 Mill was constructed in 1996, and already the particulate emission rate for which it was originally permitted will be increased. Why is the increase necessary? Is the increase associated with a product capacity increase? We have reviewed the five-page Technical Support Document and did not find an explanation for the needed increase.

Response 1:

According to A. E. Staley, there are problems with plugging of the grinding mill by starch during its startup sequence. The company believes that an increased air flow rate will reduce the problems with plugging and improve the mill's reliability.

Air flow rate is one of the parameters used to calculate potential to emit from the grinding mill's baghouse. The increase in potential to emit is due solely to the increase in maximum air flow rate. Potential to emit assumes the maximum airflow rate at 8760 hours per year, regardless of whether or not A. E. Staley operates at the maximum airflow rate after startup.

Grain loading would remain unchanged. Maximum production capacity will not increase.

Comment 2a:

There is no mention in the IDEM notice of the problem of the "Staley stench."

Comment 2b:

In earlier correspondence, OAQ informed members of the Sierra Club Wildcat Group that odors from the Sagamore Plant can be released by the emission of particulate matter (PM-10). The PM-10 gives the "burnt com" odor. We are opposed to any increase in odor emissions from the Sagamore Plant, especially the "burnt corn" odor.

Response 2:

OAQ has no specific federal or state authority to regulate odors. At present, OAQ can only regulate the pollutants which may be contributing to the odors. OAQ does not have the authority to impose a moratorium on increased emissions or to deny a permit based on odors.

Comment 3:

Can the 40F88 Baghouse capacity be expanded or upgraded to avoid the increased emissions?

Response 3:

For this grinding mill, the best available control technology (BACT) would be the use of fabric filter dust collectors rated at a minimum 99% control efficiency and a maximum emission rate of 0.005 gr/dscf, based on current analysis. However, no applicable regulation requires the grinding mill to use BACT. The grinding mill's present emission rate of 0.008 gr/acf is sufficient for complying with state and federal regulations.

Comment 4:

There is no mention of correction of the error in their method of calculation of sulfur dioxide emissions that OAQ mentioned on Page 2 of the Technical Support Document. Thus, I am formally requesting a public hearing over this application on behalf of the public in order to understand whether A. E. Staley has corrected its methods and has a real plan to eliminate the emissions.

Response 4:

The problems with A. E. Staley's sulfur dioxide calculations pertain to the wastewater treatment plant's biogas scrubber (emission unit 34V11). For several years, A. E. Staley incorrectly calculated the amount of sulfur content in the biogas. This miscalculation resulted in an insufficient amount of caustic being added to the biogas scrubber, subsequently resulting in increased sulfur dioxide emissions as the biogas was either used as fuel or sent to a flare. A. E. Staley has corrected the formula and the biogas scrubber is now being operated with a sufficient amount of caustic to clean the biogas properly. The investigation by the Office of Enforcement is pending.

OAQ intends to hold a public hearing for Significant Source Modification (SSM) 157-18832-00003 and will discuss the wastewater treatment plant's biogas scrubber issues at the hearing. That source modification, which seeks an increase in corn grind capacity and an expansion of the starch finishing system, would increase the amount of wastewater sent to the treatment plant. The public hearing will be scheduled during the public comment period of SSM 157-18832-00003. The Sierra Club Wildcat Group and interested citizens will be notified by mail of the public comment period and the date, time and location of the public hearing.

Comment 5:

We appreciate the two Enforcement Issues that OAQ disclosed in the Technical Support Document. We would like to be informed regarding the Office of Enforcement's findings for these two issues. Can you tell us whom we should contact?

Response 5:

As mentioned earlier in this addendum, the statement in the Technical Support Document that OAQ recently found evidence that A.E. Staley exceeded carbon monoxide limits placed on Boiler 31B1 is incorrect. The coal-fired boiler on which evidence indicates an alleged violation of carbon monoxide limits is located at A. E. Staley's South plant. Nonetheless, the Office of Enforcement's Air Enforcement Section can be contacted about the enforcement issues at either plant by dialing Matt Stuckey at 317-233-1134, or toll free inside Indiana by dialing 800-451-6027 and asking for extension 3-1134.

Appendix A: Emissions Calculations

Company Name: A.E. Staley Manufacturing Company
Address City IN Zip: 2245 North Sagamore Parkway, Lafayette IN 47904-1620
ID: 157-19702-00003
Reviewer: Allen R. Davidson
Date: 08/19/04

Old Emission Limit

$$\frac{0.008 \text{ grain}^*}{\text{acf}} \times \frac{2200 \text{ acf}^*}{\text{min}} \times \frac{60 \text{ min}^*}{\text{hr}} \times \frac{\text{lb}}{7000 \text{ grain}} = \frac{0.15 \text{ lb}}{\text{hr}}$$
$$\frac{0.15 \text{ lb}^*}{\text{hr}} \times \frac{8760 \text{ hr}^*}{\text{yr}} \times \frac{\text{ton}}{2000 \text{ lb}} = \frac{0.66 \text{ ton}}{\text{yr}}$$

New Emisison Limit

$$\frac{0.008 \text{ grain}^*}{\text{acf}} \times \frac{3300 \text{ acf}^*}{\text{min}} \times \frac{60 \text{ min}^*}{\text{hr}} \times \frac{\text{lb}}{7000 \text{ grain}} = \frac{0.23 \text{ lb}}{\text{hr}}$$
$$\frac{0.23 \text{ lb}^*}{\text{hr}} \times \frac{8760 \text{ hr}^*}{\text{yr}} \times \frac{\text{ton}}{2000 \text{ lb}} = \frac{0.99 \text{ ton}}{\text{yr}}$$