



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

December 13, 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: Indiana Sugars, Inc. / 089-19805-00490

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

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

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

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

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

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

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

Enclosures
FNPER-AM.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Galen Hancock
 Indiana Sugars, Inc.
 911 Virginia Street
 Gary IN 46402-2705

Re: 089-19805-00490
 Revision to Registration 089-19053-00490

Dear Mr. Hancock:

Indiana Sugars, Inc. was issued a registration on July 30, 2004 for a sugar products and corn syrup blends manufacturing plant located at 911 Virginia Street, Gary IN 46402-2705. A letter requesting a revision was received by the Office of Air Quality (OAQ) on November 1, 2004. The request was made to install a new bulk sugar unloading station, consisting of one (1) silo with fabric filter, which will receive sugar pneumatically conveyed from bulk trucks.

Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that your emission source remains classified as registered. Because the unloading system is pneumatic, the particulate collection system is considered to be integral to the conveying process. Particulate matter (PM) and PM₁₀ emissions from the new station were calculated to be 0.53 tons per year, raising the emission source's potential to emit each of PM and PM₁₀ to 9.72 tons per year.

Pursuant to the provisions of 326 IAC 2-5.5-6(h), facility (b) of Registration 089-19053-00490 is hereby revised as follows:

(b) Grinding mill and product collection equipment consisting of:

[Items (1) through (6) remain unchanged.]

(7) One (1) truck unloading system (identified as Unit 7), with a maximum throughput capacity of 50,000 pounds per hour of granulated sugar, equipped with a fabric filter, which is integral to control, and exhausting at stack 7.

Also, the table in Condition (b) of the registration is hereby revised as follows:

Emission Unit	Maximum Throughput Rate		Particulate Emission Limit
	(lbs/hour)	(tons/hour)	(lbs/hour)
Each of the two (2) sugar Mills (Unit 1 and 2)	7,500	3.75	9.94
Each of the two bulk transport systems (Unit 1A and 2A)	7,500	3.75	9.94
Bagging operation (Unit 5)	15,000	7.50	15.8
Truck unloading system (Unit 6)	40,000	20	30.5
Truck unloading system (Unit 7)	50,000	25	35.4

All other conditions of the registration shall remain unchanged and in effect. Please find attached a copy of the revised registration.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Allen R. Davidson at (800) 451-6027, press 0 and ask for extension 3-5693, or dial (317) 233-5693.

Sincerely,

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

Attachments

ARD

cc: File-Lake County
Lake County Health Department
IDEM Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner



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Mr. Galen Hathcock
Indiana Sugars, Inc.
911 Virginia Street
Gary IN 46402-2705

Re: 089-19805-00490
Revised Registration 089-19053-00490

Dear Mr. Hathcock:

The application from Indiana Sugars, Inc., received on May 3, 2004, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following sugar products and corn syrup blends manufacturing plant located at 911 Virginia Street, Gary IN 46402-2705, is classified as registered:

- (a) Two (2) natural gas-fired boilers (identified as B1 and B2), each with a maximum heat input capacity of 4.18 MMBtu per hour. These units were constructed in 1982.
- (b) Grinding mill and product collection equipment consisting of:
 - (1) One (1) sugar mill (identified as Unit 1), constructed in 1982, with a maximum throughput rate of 7,500 pounds per hour of granulated sugar and corn starch, equipped with a fabric filter which serves as a product collector and is integral to the process. The fabric filter exhausts at stack 1.
 - (2) One (1) sugar mill (identified as Unit 2), constructed in 1982, with a maximum throughput rate of 7,500 pounds per hour of granulated sugar and corn starch, equipped with a fabric filter which serves as a product collector and is integral to the process. The fabric filter exhausts at stack 2.
 - (3) One (1) bulk transport system (identified as Unit 1A) used in conjunction with the sugar mill (identified as Unit 1), constructed in 1982, with a maximum throughput rate of 7,500 pounds per hour of granulated sugar and corn starch, equipped with a fabric filter, which is integral to the process. The fabric filter exhausts at stack 1A.
 - (4) One (1) bulk transport system (identified as Unit 2A) used in conjunction with the sugar mill (identified as Unit 2), constructed in 1982, with a maximum throughput rate of 7,500 pounds per hour of granulated sugar and corn starch, equipped with a fabric filter, which is integral to the process. The fabric filter exhausts at stack 2A.
 - (5) Bagging operations (identified as Unit 5), constructed in 1992, with a maximum throughput capacity of 15,000 pounds per hour of powdered sugar, equipped with a dust collector, which is integral to control, and exhausting at stack 5.
 - (6) One (1) truck unloading system (identified as Unit 6), constructed in 2002, with a maximum throughput capacity of 40,000 pounds per hour of granulated sugar, equipped with a fabric filter, which is integral to control, and exhausting at stack 6.

- (7) One (1) truck unloading system (identified as Unit 7), with a maximum throughput capacity of 50,000 pounds per hour of granulated sugar, equipped with a fabric filter, which is integral to control, and exhausting at stack 7.

The following conditions shall be applicable:

- (a) 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:
 - (1) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period 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.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the grinding mills and product collection equipment shall not exceed the pound per hour limit as shown in the table below:

Emission Unit	Maximum Throughput Rate		Particulate Emission Limit
	(lbs/hour)	(tons/hour)	(lbs/hour)
Each of the two (2) sugar Mills (Unit 1 and 2)	7,500	3.75	9.94
Each of the two bulk transport systems (Unit 1A and 2A)	7,500	3.75	9.94
Bagging operation (Unit 5)	15,000	7.50	15.8
Truck unloading system (Unit 6)	40,000	20	30.5
Truck unloading system (Unit 7)	50,000	25	35.4

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

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

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

The six (6) fabric filters shall be in operation at all times the grinding and product collection equipment is in operation, in order to comply with this limit.

- (c) Pursuant to 326 IAC 6-2-3(e) (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the two (2) 4.18 MMBtu per hour boilers, which were existing and in operation before September 21, 1983 shall each not exceed 0.6 pounds of particulate per MMBtu heat input.

This revised registration is the second revision to the air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Allen R. Davidson at (800) 451-6027, press 0 and ask for extension 3-5693, or dial (317) 233-5693.

Sincerely,

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

ARD

cc: File-Lake County
Lake County Health Department
IDEM Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

Company Name:	Indiana Sugars, Inc.
Address:	911 Virginia Street
City:	Gary, IN 46402-2705
Authorized individual:	Galen Hathcock
Phone #:	(219) 886-9151
Registration #:	089-19053-00490

I hereby certify that Indiana Sugars, Inc. is still in operation and is in compliance with the requirements of Registration 089-19053-00490.

Name (typed):
Title:
Signature:
Date:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration Revision

Source Background and Description

Source Name:	Indiana Sugars, Inc.
Source Location:	911 Virginia Street, Gary IN 46402-2705
County:	Lake
SIC Code:	2062
Operation Permit No.:	089-19053-00490
Operation Permit Issuance Date:	July 30, 2004
Application No.:	089-19805-00490
Permit Reviewer:	Allen R. Davidson

On November 1, 2004, the Office of Air Quality (OAQ) received an application from Indiana Sugars, Inc. relating to the construction and operation of a new bulk sugar unloading station, consisting of one (1) silo with fabric filter, which will receive sugar pneumatically conveyed from bulk trucks.

History

Indiana Sugars, Inc. was issued a registration for a sugar products and corn syrup blends manufacturing plant on July 30, 2004. The emission source received a revision on September 24, 2004. This application is the second revision to the original registration.

Enforcement Issues

There are no enforcement actions pending against this emission source.

Recommendation

The staff recommends to the Commissioner that the application be approved as a Registration Revision. 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 November 1, 2004.

Emission Calculations

Because the unloading system is pneumatic, the particulate collection system is considered to be integral to the conveying process. 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	9.19
PM ₁₀	9.19
SO ₂	0.02
VOC	0.20
CO	3.08
NO _x	3.67

HAP's	Potential To Emit (tons/year)
TOTAL	0

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of each criteria pollutant is less than 25 tons per year. However, the potential to emit PM and PM₁₀ is greater than five (5) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.5.

This source is not a major source for Prevention of Significant Deterioration, 326 IAC 2-2. No attainment regulated pollutant has the potential to emit at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

This source is not a major source for Emission Offset, 326 IAC 2-3. Although it is located in a severe ozone nonattainment area, the potential to emit volatile organic compounds is less than 25 tons per year.

The revision's potential to emit is follows:

Pollutant	Potential To Emit (tons/year)
PM	0.53
PM ₁₀	0.53
SO ₂	0
VOC	0
CO	0
NO _x	0

HAP	Potential To Emit (tons/year)
TOTAL	0

Justification for Registration Revision

The potential to emit particulate matter (PM) and PM₁₀ emissions from the new station were calculated to be 0.53 tons per year, raising the emission source's potential to emit each of PM and PM₁₀ to 9.72 tons per year. Since the potential to emit PM and PM₁₀ remains less than 25 tons per year, the emission source remains classified as registered.

This application is not classifiable as a notice-only change under 326 IAC 2-5.5-6(d). However, it can be processed as a revision under 326 IAC 2-5.5-6(h).

County Attainment Status

The source is located in Lake County.

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

Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are precursors for the formation of ozone. Lake County has been designated as nonattainment in Indiana for the 1-hour ozone standard and the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

Lake County has also been classified as nonattainment for sulfur dioxide (SO₂). Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

Lake County has been classified as attainment for carbon monoxide (CO), oxides of nitrogen (NO_x) and particulate matter less than 10 microns in diameter (PM₁₀). Therefore, CO, NO_x and PM₁₀ 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) included in this revision.

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

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This revision is not major for Prevention of Significant Deterioration, 326 IAC 2-2. No attainment regulated pollutant has the potential to emit at major source thresholds. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

326 IAC 2-3 (Emission Offset)

This revision is not major for Emission Offset, 326 IAC 2-3. Although it is located in a severe ozone nonattainment area, the revision does not emit VOC or NO_x.

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

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control). It does not have potential emissions, before controls, of 10 tons per year of any HAP or 25 tons per year of any combination of HAPs.

326 IAC 2-6 (Emission Reporting)

Although the source is located in Lake County, it does not have potential to emit VOC or NO_x greater than the thresholds in 326 IAC 2-6-1(a)(2). Also, this source is not required to have an operating permit under 326 IAC 2-7. Therefore, this source is not subject to 326 IAC 2-6 (Emission Reporting).

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of twenty percent (20%) 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 - Truck Unloading Station

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

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

The control equipment shall be in operation at all times this emission unit is in operation, in order to comply with this limit.

Conclusion

The operation of this facility shall be subject to the conditions of the attached registration revision, No. 089-19805-00490.

Appendix A: Emission Calculations

Company Name: Indiana Sugars, Inc.
Address City IN Zip: 911 Virginia Ave, Gary, IN 46402-2705
ID: 089-19805-00490
Reviewer: Allen R. Davidson
Date: 12/3/2004

The following calculations determine emissions based on 8760 hours per year and data supplied by the applicant:

$$\begin{array}{r} \frac{700 \text{ cf} *}{\text{min}} \quad \frac{0.02 \text{ gr} *}{\text{cf}} \quad \frac{\text{lb} *}{7000 \text{ gr}} \quad \frac{60 \text{ min} =}{\text{hr}} \quad \frac{0.12 \text{ lb}}{\text{hr}} \\ \frac{0.12 \text{ lb} *}{\text{hr}} \quad \frac{8760 \text{ hr} *}{\text{yr}} \quad \frac{\text{ton} =}{2000 \text{ lb}} \quad \frac{0.53 \text{ ton}}{\text{yr}} \end{array}$$

The following calculations determine the particulate emission limit under 326 IAC 6-3-2:

$$E = 4.10 * 25^{0.67} = 35.43 \text{ lb/hr}$$