



Thomas M. McDermott, Jr.
Mayor

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

CITY OF HAMMOND

RONALD L. NOVAK
Director

April 1, 2005

Certified Mail # 9059 7264

Christine Schuster
Environmental Manager
Cargill, Inc.
1100 Indianapolis Blvd.
Hammond, IN 46320-1094

Re: **089-20933-00203**, Administrative Amendment to
Part 70 permit **T089-7994-00203**

Dear Ms. Schuster:

Cargill, Inc. was issued a Part 70 Operating Permit on June 28, 2004 for a Wet Corn Milling facility. In a letter dated January 14, 2005, you advised this Department that during a routine inspection by HDEM in November, 2004, it was discovered that the permitted pressure drop range for the Corn Syrup Spray Dryer #4 was incorrect.

After investigation by Cargill, it was determined that the original monitoring device may have been installed incorrectly and that the device would be changed if necessary and correctly installed. Cargill also stated that they would monitor the operation for a period of thirty (30) days and submit a request for an amendment of the permitted pressure drop range if necessary.

In a letter dated March 4, 2005, Cargill advised this Department that the pressure drop recording device had been upgraded and that an amendment to the existing scrubber pressure drop range for Corn Syrup Spray Dryer #4, Unit ID 100-03-R, in section D.5.11(b) of the Part 70 permit, would be necessary.

Pursuant to the provisions of 326 IAC 2-7-11 the permit is hereby administratively amended as follows:

Proposed Changes:

The following changes were agreed to and made as an administrative amendment to the Part 70 permit (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

On page 61 of 79, in Section D.5.11(b), the parametric monitoring pressure drop range for the Corn Syrup Spray Dryer #4 scrubber has been changed as follows:

| | Unit ID | Control Equipment | Pressure Drop Range (inches of water) |
|-----|---|-------------------|---------------------------------------|
| (a) | Corn Syrup Solids Mfg System #2 (18-03-R) | Dust Collector | 5 - 15 |
| (b) | Corn Syrup Spray Dryer #4 (100-03-R) | Wet Scrubber | 0.1 - 7 1.0 - 8.0 |

In accordance with 326 IAC 2-7-11, this amendment to the Part 70 permit revises descriptive information where the revision will not trigger a new applicable requirement or violate a permit term.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact this Department at (219) 853-6306.

Sincerely,

ORIGINAL SIGNED BY:

Ronald Holder, Engineer
Hammond Department of Environmental Management
Air Pollution Control Division

ENCLOSURE

cc: IDEM-OAQ - Mindy Hahn - Permits Administration

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Hammond Department of Environmental Management (HDEM). 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 Wet Corn Milling Facility.

| | |
|------------------------------|---|
| Responsible Official: | Plant Manager |
| Source Address: | 1100 Indianapolis Boulevard Hammond, Indiana 46320 |
| Mailing Address: | 1100 Indianapolis Boulevard Hammond, Indiana 46320-1094 |
| General Source Phone Number: | (219) 659-2000 |
| SIC Code: | 2046 – Wet Corn Milling |
| County Location: | Lake |
| Source Location Status: | Nonattainment for ozone under the 8-hour standard Nonattainment for ozone under the 1-hour standard Nonattainment for SO ₂ , Attainment for PM ₁₀ , NO _x , CO, and Lead |
| Source Status: | Part 70 Permit Program Major Source, under PSD or Emission Offset Rules; and Nonattainment NSR Major Source, Section 112 of the Clean Air Act Not 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:

I. Biogas Flare

Biogas Flare (Unit ID 800-05-E), installed July 1995. Biogas is generated in the wastewater treatment plant by anaerobic reaction. The biogas flare converts the hydrogen sulfide (H₂S) in the biogas to sulfur dioxide (SO₂). It is used when the biogas stream is not being diverted to a plant process burner for energy recovery, which is the normal scenario. The biogas flare exhausts to stack ID S800-05-E.

II. Beta Cyclodextrin (BCD) Area and Hydroxypropyl Cyclodextrin (HPCD) Process

The BCD process uses a VOC catalyst and includes the following process units.

- (a) BCD Reaction and Separation (Unit ID 127-03-B), installed May 1993. VOC emissions from two (2) BCD reactors, a product stripper, and a by-product stripper are controlled by primary condensers a, b, and c that vent to and exhaust from the secondary and final polishing condenser 127-03-B(d).

- (b) BCD Dryer (Unit ID 127-01-B), installed December 1988. BCD crystals are passed through a rotary tray dryer. BCD loadout is controlled by a bag filter dust collector. This unit exhausts to stack ID S127-01-B.
- (c) BCD Mill Feed Hopper (Unit ID 127-25-B), installed May 1993. Particulate emissions are controlled by dust collector (CE127-25-B) that exhausts to stack S127-25-B.
- (d) No. 1 and No. 2 BCD Storage Hoppers (Unit ID 127-23-B and 127-24-B), installed in May 1993. BCD is pneumatically conveyed to these hoppers equipped with bag filter dust collectors that exhaust to stacks S127-23-B and S127-24-B.
- (e) No. 1 and No. 2 Vacuum Cleaner Systems (Unit ID 127-21-B and 127-22-B), installed in May 1993. These systems are for building dust. Particulate emissions are controlled by dust collectors that exhaust to stacks S127-21-B and S127-22-B.

Hydroxypropyl Cyclodextrin (HPCD) is made using the above beta-cyclodextrin (BCD), this process includes the following unit:

- (f) One (1) 5000 gallon Hydroxypropyl Cyclodextrin (HPCD) Reactor (Unit ID 127-27-B), installed in 1998. A 500 SCFM Catalytic/Thermal Oxidizer is used to oxidize 98% of the VOC emissions.

III. Grind and Feedhouse Area

- (a) Gluten Dryer System (Unit ID 121-01-G), installed March 1995. Gluten meal is fed to a natural and bio gas-fired ring dryer. Particulate emissions are controlled by wet scrubber (CE121-01-G) that exhausts to stack S121-01-G.
- (b) First Stage Germ Dryer Receiver (Unit ID 21A-01-G), installed May 1978. Corn germ is pneumatically transferred to a germ dryer. Particulate emissions are controlled by a cyclone (CE21A-01-G) that exhausts to stack S21A-01-G.
- (c) First Stage Germ Dryer (Unit ID 21A-02-G), installed May 1978. Corn germ is fed to this dryer heated with steam from plant boilers. Particulate emissions are controlled by a cyclone and wet roto-clone in series (CE21A-02-G) that exhaust to stack S21A-02-G.
- (d) Second Stage Germ Dryer Receiver (Unit ID 51A-01-G), installed May 1978. Corn germ from the first stage dryer is pneumatically conveyed to the second stage dryer. Particulate emissions are controlled by a cyclone (CE51A-01-G) that exhausts to stack S51A-01-G.
- (e) Second Stage Germ Dryer (Unit ID 51A-02-G), installed October 1995. Corn germ is fed to this dryer heated by steam from plant boilers. Particulate emissions are controlled by a cyclone and wet scrubber in series (CE51A-02-G) that exhausts to stack S51A-02-G.
- (f) Fiber Drying Equipment (Unit ID 89-01-G), installed October 1995. Wet fiber is fed to this natural and bio gas-fired dryer. Particulate matter is controlled by a scrubber (CE89-01-G) that exhausts to stack S89-01-G.
- (g) Rotary Feed Dryer (Unit ID 89-03-G), installed October 1995. Wet feed is fed to this natural and bio gas-fired dryer. Particulate emissions are controlled by four (4) recirculating cyclones. VOC emissions are controlled by thermal oxidizer (CE89-03-TO) that normally exhausts to the Fiber Dryer Furnace but can exhaust to its own stack S89-03-G.

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- (h) Corn Screenings to Grind 1 Feed Transfer (Unit ID 89-05-G), installed July 2000. Particulate emissions are controlled by a dust collector (CE89-05-G) that exhausts to stack S89-05-G.
 - (i) Waxy Feed Drum Dryer (Unit ID 124-01-G), installed March 1980. Waxy corn fiber is fed to a rotary drum dryer. Particulate emissions are controlled by a wet scrubber (CE124-01-G) that exhausts to stack S124-01-G.
 - (j) Germ Storage Silo (Unit ID 121-14-G), installed May 1996. Corn germ is pneumatically conveyed to this storage silo. Particulate emissions are controlled by a dust collector (CE121-14-G) that exhausts to stack S121-14-G.
 - (k) Germ Dryer/Cooler (Unit ID 124A-01-G), installed November 1994. Corn germ is fed to this natural and bio gas-fired germ dryer and cooler. Particulate emissions are controlled by four (4) cyclones (CE124A-01-G) that exhaust to stack S124A-01-G.
 - (l) Waxy Feed Mill Equipment (Unit ID 124-22-G), installed July 1976. Waxy corn fiber is milled and fed to a hopper equipped with a Flex-Kleen Bag Filter Collector (CE124-22-G). This system exhausts to stack S124-22-G.
 - (m) Corn Screenings to Grind 2 Feed Transfer (Unit ID 124-23-G), installed July 2000. Particulate emissions are controlled by a dust collector (CE124-23-G) that exhausts to stack S124-23-G.
 - (n) Loose Feed Bin (Unit ID 201-05-G), installed October 2000. Particulate emissions are controlled by a bin vent (CE201-05-G) that exhausts to stack S201-05-G.
 - (o) Hammermill #1 (Unit ID 201-01-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE201-01-G) that exhausts to stack S201-01-G.
 - (p) Hammermill #2 (Unit ID 201-02-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE201-02-G) that exhausts to stack S201-02-G.
 - (q) Pellet Cooler #1 (Unit ID 201-03-G), installed October 2000. Particulate emissions are controlled by a cyclone (CE201-03-G) that exhausts to stack S201-03-G.
 - (r) Pellet Cooler #2 (Unit ID 201-04-G), installed October 2000. Particulate emissions are controlled by a cyclone (CE201-04-G) that exhausts to stack S201-04-G.
 - (s) Central Vacuum Pelletizing (Unit ID 201-06-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE201-06-G) that exhausts to stack S201-06-G.
 - (t) Central Vacuum Loadout (Unit ID 200-07-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE200-07-G) that exhausts to stack S200-07-G.
 - (u) Pellet Silo #1 (Unit ID 200-01-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE200-01-G) that exhausts to stack S200-01-G.
 - (v) Pellet Silo #2 (Unit ID 200-02-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE200-02-G) that exhausts to stack S200-02-G.
 - (w) Loose Feed Silo (Unit ID 200-06-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE200-06-G) that exhausts to stack S200-06-G.

- (x) Gluten Silo (Unit ID 200-04-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE200-04-G) that exhausts to stack S200-04-G.
- (y) Germ Silo (Unit ID 200-03-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE200-03-G) that exhausts to stack S200-03-G.
- (z) Bulk Loadout (Unit ID 200-05-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE200-05-G) that exhausts to stack S200-05-G.
- (aa) Corn Dump Pit (Unit ID 140-05-G), installed December 1995. Particulate emissions are controlled by filter baghouse (CE140-05-G) that exhausts to stack S140-05-G.
- (bb) Corn Elevator Conveying (Unit ID 140-07-G), installed December 1995. Material is transferred from corn belt 1 to corn belt 2. Particulate emissions are controlled by a filter baghouse (CE140-07-G) that exhausts to stack S140-07-G.
- (cc) Corn Receiving and Storage, installed December 1995. This system includes six Storage Bins, each with its own bin vent for control of particulate emissions:
 - a) Bin #1: Unit ID 140-01-G
 - b) Bin #2: Unit ID 140-02-G
 - c) Bin #3: Unit ID 140-03-G
 - d) Bin #4: Unit ID 140-04-G
 - e) Bin #5: Unit ID 33-01-G
 - f) Bin #6: Unit ID 33-02-G
- (dd) Gravity Take-up Conveyor (Corn Scale System) (Unit ID 140-06-G), installed December 1995. Corn is transferred from corn belt 2 to corn belt 3. Particulate emissions are controlled by baghouse (CE140-06-G) that exhausts to stack S140-06-G.
- (ee) Corn Cleaner (Unit ID 33-03-G), installed December 1995. Corn passes through mechanical cleaners. Particulate emissions are controlled by a filter baghouse (CE33-03-G) that exhausts to stack S33-03-G.
- (ff) Corn Screenings System (Unit ID 30-16-G), installed July 1976. This system includes a dirt storage silo equipped with bag filter collector (CE30-16-G) that exhausts to stack S30-16-G.

IV. Utility Area

The Utility area includes six (6) boilers used to supply steam for plant processes. A small rental, natural gas fired boiler is used when all boilers are down for maintenance.

- (a) Boiler No. 1 (Unit ID 10-01-U), Combustion Engineering Model VP10R, installed in 1960, with a maximum rate of 96 MMBtu/hr heat input and natural gas-fired only. This unit exhausts through stack S10-01-U.
- (b) Boiler No. 2 (Unit ID 10-02-U), Erie City Model 19M, installed in 1966, with a maximum rate of 160 MMBtu/hr heat input and natural gas-fired only. This unit exhausts through stack S10-02-U.
- (c) Boiler No. 6 (Unit ID 10-03-U), Combustion Engineering Model VU-50, installed in 1956, with a maximum rate of 200 MMBtu/hr heat input and natural gas-fired with a fuel oil #6 secondary capability. This unit exhausts through stack S10-03-U.

- (d) Boiler No. 7 (Unit ID 10-04-U), Combustion Engineering Model VU, installed in 1944, with a maximum rate of 120 MMBtu/hr heat input and natural gas-fired with a fuel oil #6 secondary capability. This unit also exhausts through stack S10-03-U.
- (e) Boiler No. 8 (Unit ID 10-05-U), Combustion Engineering Model VU, installed in 1937, with a maximum rate of 120 MMBtu/hr heat input and natural gas-fired with a fuel oil #6 secondary capability. This unit exhausts through stack S10-05-U.
- (f) Boiler No. 10 (Unit ID 10-06-U), Combustion Engineering Model VU, installed in 1937, with a maximum rate of 120 MMBtu/hr heat input and natural gas-fired with a fuel oil #6 secondary capability. This unit also exhausts through stack S10-05-U.

V. Refinery Area

- (a) Corn Syrup Solids Manufacturing System #2 (Unit ID 18-03-R), installed July 1992. Corn syrup solids are fed through a cooling tunnel, milled, screened, and dropped to a receiver for packing. Particulate emissions are controlled by a jet pulse dust collector (CE18-03-R) that exhausts to stack S18-03-R.
- (b) Corn Syrup Spray Dryer #4 (Unit ID 100-03-R), installed April 1992. Corn syrup is fed to a dryer. The solids are sent through cyclones to a packing area. Particulate emissions are controlled by a wet scrubber (CE100-03-R) that exhausts to stack S100-03-R.
- (c) Corn Syrup Spray Dryer/Cooler System #3 (Unit ID 100-01-R), installed July 1987. Corn syrup is fed to a dryer. The solids are sent through cyclones to a packing area. Particulate emissions are controlled by a wet venturi scrubber (CE100-01-R) that exhausts through stack S100-01-R.
- (d) Activated Carbon Regeneration Furnace #2 (Unit ID 104-01-R), installed July 1995. Spent carbon is regenerated in this natural gas-fired furnace. Emissions are controlled by a venturi scrubber and an impingement furnace scrubber (CE104-01-R) that exhaust through stack S104-01-R.
- (e) Soda Ash Tank (Unit ID 104-02-R), installed July 1995. Particulate emissions from loading this tank are controlled by a venturi scrubber (CE104-02-R) that exhausts to stack S104-02-R.
- (f) Filter Aid Hopper (Unit ID 104-03-R), installed July 1995. This hopper is equipped with a jet pulse baghouse (CE104-03-R) that exhausts to stack S104-03-R.
- (g) Sodium Bisulfite Bag Dump (Unit ID 104-05-R), installed July 1995. This unit is controlled by a jet pulse baghouse (CE104-05-R) that exhausts to stack S104-05-R.
- (h) Diatomaceous Earth Unloading (Unit ID 104-08-R), installed November 1998. Diatomaceous earth (filter aid) is unloaded from railcar to Silo. Particulate emissions are controlled by a Bin Vent Filter (DC2312) that exhausts to stack S104-08-R.
- (i) Citric Acid Dump Station (Unit ID 104-09-R), installed November 1998. Citric Acid is added during the production of corn syrup. Particulate emissions are controlled by a built-in dust collector (CE104-09-R) that exhausts to stack S104-09-R.

VI. Starch Production Area

- (a) Batch Scale Hopper #1 (Unit ID 34-01-S), installed January 1991. Starch is pneumatically conveyed to a hopper. Particulate emissions are controlled by a bag filter dust collector (CE34-01-S) that exhausts to stack S34-01-S.
- (b) Dextrin Starch Reactor #1 (Unit ID 34-02-S), installed January 1991. Dried corn starch is fed to a reactor heated by steam from the plant boilers. Particulate emissions are controlled by a bag filter dust collector (CE34-02-S) that exhausts to stack S34-02-S.
- (c) Dextrin Starch Cooler #1 (Unit ID 34-03-S), installed January 1991. Roasted corn starch is fed to a cooler and transferred to a hopper for storage. Particulate emissions are controlled by a bag filter dust collector (CE34-03-S) that exhausts to stack S34-03-S.
- (d) Surge Hopper #1 (Unit ID 34-05-S), installed January 1991. Starch is pneumatically conveyed to a hopper. Particulate emissions are controlled by a bag filter dust collector (CE34-05-S) that exhausts to stack S34-05-S.
- (e) Dextrin Feed Hoppers #1 and #2 (System #1) (Unit IDs 34-06-S and 34-07-S), installed April 1993. Starch is gravity conveyed to these hoppers. Particulate emissions are controlled by bag filter dust collectors (CE34-06-S and CE34-07-S) that exhaust to stacks S34-06-S and S34-07-S.
- (f) Batch Scale Hopper #2 (Unit ID 34B-13-S), installed October 1993. Starch is pneumatically conveyed to a hopper. Particulate emissions are controlled by a bag filter dust collector (CE34B-13-S) that exhausts to stack S34B-13-S.
- (g) Dextrin Starch Reactor #2 (Unit ID 34B-04-S), installed October 1993. Dried corn starch is fed to a reactor heated by steam from the plant boilers. Particulate emissions are controlled by a bag filter dust collector (CE34B-04-S) that exhausts to stack S34B-04-S.
- (h) Dextrin Starch Cooler #2 (Unit ID 34B-01-S), installed October 1993. Roasted corn starch is fed to a cooler and transferred to a hopper for storage. Particulate emissions are controlled by dust collector (CE34B-01-S) that exhausts to stack S34B-01-S.
- (i) Surge Hopper #2 (Unit ID 34B-03-S), installed October 1993. Starch is pneumatically conveyed to a hopper. Particulate emissions are controlled by a bag filter dust collector (CE34B-03-S) that exhausts to stack S34B-03-S.
- (j) Dextrin Feed Hoppers #3 and #4 (System #2) (Unit IDs 34B-05-S and 34B-06-S), installed October 1993. Starch is gravity conveyed to these hoppers. Particulate emissions are controlled by bag filter dust collectors (CE34B-05-S and CE34B-06-S) that exhaust to stacks S34B-05-S and S34B-06-S.
- (k) Dextrin Bulk Loading Equipment (Unit ID 48-09-S), installed before 1977. Starch is pneumatically conveyed to this hopper. Particulate emissions are controlled by a bag filter dust collector (CE48-09-S) that exhausts to stack S48-09-S.
- (l) Starch Ring Dryer #2 (Unit ID 59-03-S), installed November 1993. Starch is fed to this natural gas-fired ring dryer. Dried starch is collected with six cyclones in series. Particulate emissions are controlled by a wet scrubber (CE59-03-S) that exhausts to stack S59-03-S.

- (m) Starch Milling Systems #1 and #2 (Unit IDs 59-01-S and 59-02-S), installed July 1976. Dried corn starch is milled and transferred to storage. Particulate emissions are controlled by bag filter dust collectors (CE59-01-S and CE59-02-S) that exhaust to stacks S59-01-S and S59-02-S.
- (n) Starch Ring Dryer #3 (Unit ID 125-01-S), installed May 1980. Corn starch is fed to this natural gas-fired ring dryer. Dried starch is collected with six cyclones in series. Particulate emissions are controlled by a wet scrubber (CE125-01-S) that exhausts to stack S125-01-S.
- (o) Special Starch Process with Starch Ring Dryer #4 (Unit ID 128-01-S), installed December 1993. Corn starch is fed to this natural gas-fired dryer. Dried starch is collected with six cyclones in series. Particulate emissions are controlled by wet scrubber (CE128-01-S) that exhausts to stack S128-01-S.
- (p) Reactors #1 through #8 (Unit IDs 128-06-S through 128-13-S), installed November 1988 (1-4) and December 1991 (5-8). Corn starch and propylene oxide are reacted through Reactors 2, 3, 4, and 7 only. When propylene oxide is used in the starch reaction, VOC emissions are controlled by a thermal oxidizer that exhausts to stack S128-14-S.
- (q) Sodium Sulfate Storage Bin (Unit ID 128-25-S), installed October 2000. Particulate emissions are controlled by a bin vent dust collector (FA1900), that exhausts to stack S128-25-S.
- (r) Sodium Sulfate Weigh Bin (Unit ID 128-26-S), installed October 2000. Particulate emissions are controlled by a bin vent dust collector (FA1950), that exhausts to stack S128-26-S.
- (s) Cornstarch Storage Bins #20 through #36 (Unit IDs 120-01-S through 120-17-S), installed July 1990. Corn starch is pneumatically conveyed to these storage bins. Particulate emissions are controlled by bag filter dust collectors that exhaust to stacks S120-01-S through S120-17-S.
- (t) Waxy Cornstarch Bulk Storage Bins #95 through #98 (Unit IDs 126-01-S through 126-04-S), replaced in January 1996. Waxy cornstarch is conveyed to these bins. Particulate emissions are controlled by dust collectors (CE126-01-S through CE126-04-S) that exhaust to stacks S126-01-S through S126-04-S.
- (u) Cornstarch Blending Systems #1 through #4 (Unit IDs 130-01-S through 130-04-S), installed April 1988. Cornstarch is blended and moved to the warehouse for packing. Particulate emissions are controlled by bag filter dust collectors (CE130-01-S through 130-04-S) that exhaust to stacks S130-01-S through S130-04-S.
- (v) Dextrin Blender (Unit ID 130-05-S), installed October 1993. Cornstarch is blended and moved to the warehouse for packing. Particulate emissions are controlled by a bag filter dust collector (CE130-05-S) that exhausts to stack S130-05-S.
- (w) One (1) 28,000 gallon horizontal propylene oxide tank (Unit ID 93-18-S), installed in 1988, with 95% efficient vapor recovery (liquid nitrogen condenser). This tank also provides propylene oxide to other starch processes.

VII. Starch Warehouse Area

- (a) Channel 2 Receiver (Unit ID 93-32-W), installed September 2000. Particulate emissions are controlled by a filter dust collector that exhausts to stack S93-32-W.

- (b) Channel 3 Receiver (Unit ID 93-33-W), installed September 2000. Particulate emissions are controlled by a filter dust collector that exhausts to stack S93-33-W.
- (c) Channel 4 Receiver (Unit ID 93-34-W), installed September 2000. Particulate emissions are controlled by a filter dust collector that exhausts to stack S93-34-W.
- (d) Channel 6 Receiver (Unit ID 93-35-W), installed September 2000. Particulate emissions are controlled by a filter dust collector that exhausts to stack S93-35-W.
- (e) Channel 4/6 Packing (Unit ID 93-37-W), installed September 2000. Particulate emissions are controlled by a filter dust collector that exhausts to stack S93-37-W.
- (f) Channel 2/3 Packing (Unit ID 93-36-W), installed September 2000. Particulate emissions are controlled by a filter dust collector that exhausts to stack S93-36-W.
- (g) Central Vacuum System (Unit ID 93-38-W), installed October 2000. Particulate emissions are controlled by a filter dust collector that exhausts to stack S93-38-W.
- (h) Dried Corn Syrup Conveying System (Unit ID 93-04-W), installed July 1976. Particulate emissions are controlled by a baghouse (CE93-04-W) that exhausts to stack S93-04-W.
- (i) Corn Syrup Solids Conveying System (Unit ID 93-05-W), installed July 1976. Particulate emissions are controlled by a baghouse (CE93-05-W) that exhausts to stack S93-05-W.
- (j) Frodex Semi-bulk Packing System (Unit ID 93-08-W), installed September 1989. Particulate emissions are controlled by a baghouse (CE93-08-W) that exhausts to stack S93-08-W.
- (k) Corn Starch Bag Dumping Stations #1 and #2 (Unit IDs 93-09-W and 93-10-W), installed April 1988. Particulate emissions are controlled by bag filter dust collectors (CE93-09-W and CE93-10-W) that exhaust to stacks S93-09-W and S93-10-W.
- (l) Starch Bulk Loading (Unit ID 93-14-W), installed April 1995. Particulate emissions are controlled by a baghouse (CE93-14-W) that exhausts to stack S93-14-W.
- (m) Starch Bulk Loading Vacuum Cleanup System (Unit ID 93-15-W), installed February 1994. Cleanup for cornstarch spills. Particulate emissions are controlled by bag filter dust collector (CE93-15-W) that exhausts to stack S93-15-W.
- (n) Starch Mixing and Bulk Bagging Systems #1 and #2 (Unit IDs 93-16-W and 93-17-W), installed August 1995. Particulate emissions are controlled by baghouses (CE93-16-W and CE93-17-W) that exhaust to stacks S93-16-W and S93-17-W.
- (o) P.G. Starch Receiver (Unit ID 93-18-W), installed September 1999. Starch is received from P.G. starch roll dryers for packaging. Particulate emissions are controlled by a dust collector (CE93-18-W) that exhausts to stack S93-18-W.
- (p) P.G. Starch Packing (Unit ID 93-39-W), installed January 2000. Particulate emissions are controlled by a dust collector (CE93-39-W) that exhausts to stack S93-39-W.

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

This source also consists of insignificant activities with potential uncontrolled emissions below the exemption levels specified in 326 IAC 2-1.1-3(d)(1), including these defined in 326 IAC 2-7-1(21).

1. Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour [326 IAC 6-1-2].
2. Fuel oil-fired combustion sources with heat input equal to or less than 2 million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight [326 IAC 6-1-2].
3. Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
4. Combustion source flame safety purging on startup.
5. A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
6. A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
7. VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
8. VOC and HAP vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
9. Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
10. Machining where an aqueous cutting coolant continuously floods the machining interface.
11. Cleaners and solvents characterized as follows:
 - A) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or;
 - B) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
12. The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1-2]
13. Closed loop heating and cooling systems.
14. Structural steel and bridge fabricating activities using 80 tons or less of welding consumables.
15. Solvent recycling systems with batch capacity less than or equal to 100 gallons.

16. Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
17. Operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
18. Noncontact cooling tower systems with forced and induced draft cooling tower system not regulated under a NESHAP.
19. Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
20. Heat exchanger cleaning and repair.
21. Process vessel degassing and cleaning to prepare for internal repairs.
22. Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
23. Asbestos abatement projects regulated by 326 IAC 14-10.
24. Purging of gas lines and vessels that is regulated to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
25. Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
26. Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
27. On-site fire and emergency response training approved by the department.
28. Diesel emergency generators not exceeding 1600 horsepower.
29. Stationary fire pumps.
30. Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-1-2]
31. Filter or coalescer media changeout.
32. A laboratory as defined in 326 IAC 2-7-1(21)(D).

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

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

SECTION B

GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.9]

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]

- (a) 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, Hammond Department of Environmental Management, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by the Hammond Department of Environmental Management.

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, and HDEM within a reasonable time, any information that IDEM, OAQ, and HDEM 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, and HDEM 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 April 15 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

Hammond Department of Environmental Management
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

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, and HDEM 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, and HDEM 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

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

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, and HDEM upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and HDEM. IDEM, OAQ, and HDEM 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 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, and HDEM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

(IDEM)

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

(HDEM)

Telephone Number: 219-853-6306
Facsimile Number: 219-853-6343

- (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

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

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, and HDEM 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, and HDEM 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, or HDEM 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, or HDEM 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, or HDEM 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

and

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, Indiana 46320

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, or HDEM 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, or HDEM 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, or HDEM at least

thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or HDEM 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 HDEM 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(40) and 326 IAC 2-7-1(21). 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
and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

- (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, and HDEM on or before the date it is due.
- (2) If IDEM, OAQ, and HDEM, 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, and HDEM take 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, and HDEM, 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, and HDEM 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

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

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

Hammond Department of Environmental Management
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

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, and HDEM 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 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] [IC 13-30-3-1]

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, HDEM, 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

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

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, and HDEM 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, or HDEM 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

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

C.1 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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.

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-1-11.1]

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

- (a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
- (d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.

- (f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (h) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
- (i) The PM₁₀ emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (k) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan.

C.6 Lake County Particulate Matter Contingency Measures [326 IAC 6-1-11.2]

The Permittee shall comply with the applicable provisions of 326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures).

C.7 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.8 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), 1-7-2, 1-7-3(c) and (d), 1-7-4, and 1-7-5 (a), (b), and (d) are not federally enforceable.

C.9 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

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

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 14-10-1, 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 60.145(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.10 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

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

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 and HDEM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and HDEM, 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.11 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.12 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

and

Hammond Department of Environmental Management
5925 Calumet Avenue
Hammond, Indiana 46320

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.13 Continuous Compliance Plan [326 IAC 6-1-10.1(l)] [326 IAC 6-1-10.1(u)]

Pursuant to 326 IAC 6-1-10.1(l) (Lake County PM10 Emission Requirements), the Permittee shall submit to IDEM and HDEM, and maintain at the source a copy of the Continuous Compliance Plan. The Permittee shall perform the inspections, monitoring, and record keeping requirements as specified in 326 IAC 6-1-10.1 (p) through (r). The Permittee shall update the CCP, as needed, retain a copy on site, and make the updated CCP available for inspection as specified in 326 IAC 6-1-10.1(u).

C.14 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment.
- (b) In the event that a breakdown of a continuous emission 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 emission monitor other than an opacity monitor is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup CEMS shall be brought online within four (4) hours of the shutdown of the primary CEMS, and shall be operated until such time as the primary CEMS is back in operation.
- (d) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to the rule or permit condition that requires the monitoring equipment to be installed and operated.

C.15 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.16 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 ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, 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 ($\pm 2\%$) of full scale reading.
- (c) 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.17 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 February 26, 1991.
- (b) Upon direct notification by IDEM, OAQ, or HDEM, 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.18 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.19 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 (or Parametric Monitoring Plan and Start-up, Shut-down, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plan shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ and HDEM 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 (or Parametric Monitoring Plan and

Start-up, Shut-down, and Malfunction (SSM) 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 (or Parametric Monitoring Plan and Start-up, Shut-down, and Malfunction (SSM) Plan) to include such response steps taken.

The OMM Plan (or Parametric Monitoring and SMM Plan) shall be submitted within the time frames specified by the applicable 40 CFR 60/63 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 Parametric Monitoring Plan and Start-up, Shut-down, and Malfunction (SSM) Plan); or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance, and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shut-down, and Malfunction (SSM) 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.20 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.21 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(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

This 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

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

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

- (b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and HDEM on or before the date it is due.

C.22 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 or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM 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.23 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

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

- (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, and HDEM 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.24 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.25 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

- (a) The Permittee shall submit a Part 2 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), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated 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 or prior to the issuance of a permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification 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

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

and

Hammond Department of Environmental Management
5925 Calumet Avenue, Room 304
Hammond, Indiana 46320

SECTION D.1

FACILITY OPERATION CONDITIONS

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

I. Biogas Flare

Biogas Flare (Unit ID 800-05-E), installed July 1995. Biogas is generated in the wastewater treatment plant by anaerobic reaction. The biogas flare converts the hydrogen sulfide (H₂S) in the biogas to sulfur dioxide (SO₂). It is used when the biogas stream is not being diverted to a plant process burner for energy recovery, which is the normal scenario. The biogas flare exhausts to stack ID S800-05-E.

(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 Emission Limitations and Standards [326 IAC 2-2]

Any change or modification to the Biogas Flare which increases the potential to emit (PTE) of Hydrogen Sulfide (H₂S) to above ten (10) tons per year, shall require prior approval of the IDEM-OAQ and HDEM. Compliance with this limitation renders 326 IAC 2-2 not applicable.

Compliance Determination Requirements

D.1.2 Compliance Determination Requirements

To determine compliance with Condition D.1.1, the biogas stream from anaerobic reaction shall be diverted to an active plant process burner or to the biogas flare at all times that a biogas stream is being generated.

Compliance Monitoring Requirements

D.1.3 Flame Presence

The Permittee shall monitor and record once per shift the flame presence for the Biogas Flare during each shift of operation that the biogas stream is venting to the flare. The flame presence shall be determined using either a thermal sensor or flame detector at the point of the flame.

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

D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain records of the flame presence.
- (b) 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)]: II. Beta Cyclodextrin (BCD) Area and Hydroxypropyl Cyclodextrin (HPCD)

The BCD process uses a VOC catalyst and includes the following process units.

- (a) BCD Reaction and Separation (Unit ID 127-03-B), installed May 1993. VOC emissions from two (2) BCD reactors, a product stripper, and a by-product stripper are controlled by primary condensers a, b, and c that vent to and exhaust from the secondary and final polishing condenser 127-03-B(d).
- (b) BCD Dryer (Unit ID 127-01-B), installed December 1988. BCD crystals are passed through a rotary tray dryer. BCD loadout is controlled by a bag filter dust collector. This unit exhausts to stack ID S127-01-B.
- (c) BCD Mill Feed Hopper (Unit ID 127-25-B), installed May 1993. Particulate emissions are controlled by bag filter dust collector (CE127-25-B) that exhausts to stack S127-25-B.
- (d) No. 1 and No. 2 BCD Storage Hoppers (Unit IDs 127-23-B and 127-24-B), installed May 1993. BCD is pneumatically conveyed to these hoppers equipped with bag filter dust collectors that exhaust to stacks S127-23-B and S127-24-B.
- (e) No. 1 and No. 2 Vacuum Cleaner Systems (Unit IDs 127-21-B and 127-22-B), installed May 1993. The systems are used for building dust. Particulate emissions are controlled by bag filter dust collectors that exhaust to stacks S127-21-B and S127-22-B.

Hydroxypropyl Cyclodextrin (HPCD) is made using the above beta-cyclodextrin (BCD) and includes the following units:

- (f) One (1) 5,000 gallon Hydroxypropyl Cyclodextrin (HPCD) Reactor (Unit ID 127-27-B), installed 1998. A 500 SCFM Catalytic/Thermal Oxidizer is used to oxidize 98% of the VOC emissions.

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

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

D.2.1 VOC Emissions [326 IAC 2-3] [326 IAC 8-1-6] [326 IAC 2-7-6(3)] [326 IAC 2-7-15]

The IDEM, OAQ has information that indicates that some emission units in this section are subject to the requirements of 326 IAC 2-3 (Emission Offset) and/or 326 IAC 8-1-6 (New facilities, general reduction requirements (BACT)). Therefore, the Permit Shield provided by Condition B.12 of this permit does not apply to those emission units with regards to 326 IAC 2-3 and 326 IAC 8-1-6. The IDEM, OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 2-3 or 326 IAC 8-1-6 and a schedule for achieving compliance with such requirements.

D.2.2 VOC Emissions [326 IAC 8-7] [326 IAC 2-7-6(3)] [326 IAC 2-7-15]

The IDEM, OAQ has information that indicates that some emission units in this section are subject to the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties). Therefore, the Permit Shield provided by Condition B.12 of this permit does not apply to those emission units with regards to 326 IAC 8-7. On February 27, 1995, the source submitted to IDEM, OAQ a Reasonably Achievable Control Technology (RACT) plan pursuant to 326 IAC 8-7-2. A revised RACT plan was requested and submitted by the source on August 22, 2003. The IDEM, OAQ is currently reviewing the RACT plan submitted.

The IDEM, OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 8-7 and a schedule for achieving compliance with such requirements.

D.2.3 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1(d)]

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements), subsection (d), emissions of particulate matter less than ten microns in diameter (PM10) shall be limited to the following.

| Unit ID | PM10 Limit (gr/dscf) | PM10 Limit (lbs/hr) |
|---|----------------------|---------------------|
| BCD Dryer (127-01-B) | 0.01 | 0.57 |
| BCD Mill Feed Hopper (127-25-B) | 0.01 | 0.028 |
| BCD Storage Hoppers #1 & #2 (127-23-B) & (127-24-B) | 0.01 each | 0.18 each |
| BCD Vacuum Cleaners #1 & #2 (127-21-B) & (127-22-B) | 0.01 each | 0.031 each |

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP 089-01210-00203, issued July 1998, the VOC emissions from the HPCD Reactor shall be limited to 0.250 lbs/hr which is equivalent to 1.1 TPY as maintained by a thermal oxidizer with an overall capture and control efficiency of 98% in accordance with the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements).

D.2.5 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 each BCD and HPCD facility control device.

Compliance Determination Requirements

D.2.6 Testing Requirements [326 IAC 2-7-6(1) and (6)] [326 IAC 2-1.1-11]

BCD Dryer (PM10) [326 IAC 6-1-10.1(d)]

Within 36 months of the issuance of this permit, in order to demonstrate compliance with Condition D.2.3, the Permittee shall perform PM-10 testing on the BCD Dryer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

D.2.7 Volatile Organic Compounds (VOC) [326 IAC 2-1.1-5] [326 IAC 8-7-9] [326 IAC 8-7-10]

The BCD reaction and separation condensers for VOC control shall be installed, calibrated, maintained, and operated, at a minimum, according to the manufacturer's specifications and recommendations.

D.2.8 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1(d)]

In order to comply with D.2.3, the bag filter dust collectors for PM10 control shall be in operation and control emissions from their associated facilities at all times that the facilities are in operation.

D.2.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

In order to comply with D.2.4, the thermal oxidizer for VOC control shall be in operation and control emissions from the HPCD reactor at all times that the facilities are in operation.

D.2.10 Parametric Monitoring (Thermal Oxidizer) [326 IAC 8-1-6]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. The Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1300 °F.
- (b) In order to maintain a 98% destruction efficiency, 100% of the vapors from the HPCD Reactor shall vent directly to the Thermal Oxidizer.
- (c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above-mentioned range for any one reading. 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.

Compliance Monitoring Requirements

D.2.11 VOC Emissions (BCD) [326 IAC 2-1.1-5] [326 IAC 8-7-9] [326 IAC 8-7-10]

- (a) The Permittee shall inspect the BCD reactor seals once per year and replace the seals as needed according to the manufacturer's design specifications and recommendations.
- (b) The Permittee shall maintain and monitor the temperature of the water flow to condensers 127-03-B according to the manufacturer's design specifications and recommendations.

D.2.12 Parametric Monitoring (Dust Collectors)

The Permittee shall record the total static pressure drop across all baghouses or dust collectors used in conjunction with each BCD facility at least once per day when the associated facilities are in operation. When for any one reading, the pressure drop across the dust collector is outside the following ranges or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

| Unit ID | Control Equipment | Pressure Drop Range ("H ₂ O) |
|---|-------------------|---|
| BCD Dryer (127-01-B) | Dust Collector | 0.1 - 6 |
| BCD Mill Feed Hopper (127-25-B) | Dust Collector | 0.1 - 6 |
| BCD Storage Hoppers #1 & #2 (127-23-B) & (127-24-B) | Dust Collector | 0.1 - 6 each |
| BCD Vacuum Cleaners #1 & #2 (127-21-B) & (127-22-B) | Dust Collector | 0.1 - 6 each |

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 HDEM and shall be calibrated at least once every six (6) months or in accordance with the manufacturer's specifications provided those specifications are available on site with the Preventive Maintenance Plan.

D.2.13 Baghouse (Dust Collector) Inspections

An inspection shall be performed each calendar quarter of all bags controlling these processes. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.2.14 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 is observed and it will be 10 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 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, or dust traces, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.2.15 Visible Emissions Notations

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

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

D.2.16 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of the VOC use in the HPCD reactors (propylene oxide).
- (b) To document compliance with Condition D.2.11, the Permittee shall maintain records of the results of the inspections and records of the temperature of the water flow to the condensers.
- (c) To document compliance with Condition D.2.12, the Permittee shall maintain records of the total static pressure drops during normal operation.
- (d) To document compliance with Condition D.2.13, the Permittee shall maintain records of the results of the inspections.
- (e) To document compliance with Condition D.2.15, the Permittee shall maintain records of the visible emission notations of the BCD Area facility stack exhausts.
- (f) To document compliance with Condition D.2.10, the Permittee shall record the thermal oxidizer temperature as a 3-hour average.
- (g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.17 Reporting Requirements

The source submitted to IDEM, OAQ a Reasonably Achievable Control Technology (RACT) plan pursuant to 326 IAC 8-7-2 on February 27, 1995. A revised RACT plan was requested and submitted by the source on August 22, 2003. The IDEM, OAQ is currently reviewing the RACT plan submitted. The IDEM, OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 8-7 and a schedule for achieving compliance with such requirements.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

III. Grind and Feedhouse Area

- (a) Gluten Dryer System (Unit ID 121-01-G), installed March 1995. Gluten meal is fed to a natural and bio gas-fired ring dryer. Particulate emissions are controlled by wet scrubber (CE121-01-G) that exhausts to stack S121-01-G.
- (b) First Stage Germ Dryer Receiver (Unit ID 21A-01-G), installed May 1978. Corn germ is pneumatically transferred to a germ dryer. Particulate emissions are controlled by a cyclone (CE21A-01-G) that exhausts to stack S21A-01-G.
- (c) First Stage Germ Dryer (Unit ID 21A-02-G), installed May 1978. Corn germ is fed to this dryer heated with steam from plant boilers. Particulate emissions are controlled by a cyclone and wet roto-clone in series (CE21A-02-G) that exhausts to stack S21A-02-G.
- (d) Second Stage Germ Dryer Receiver (Unit ID 51A-01-G), installed May 1978. Corn germ from the first stage dryer is pneumatically conveyed to the second stage dryer. Particulate emissions are controlled by a cyclone (CE51A-01-G) that exhausts to stack S51A-01-G.
- (e) Second Stage Germ Dryer (Unit ID 51A-02-G), installed October 1995. Corn germ is fed to this dryer heated with steam from plant boilers. Particulate emissions are controlled by a cyclone and wet scrubber in series (CE51A-02-G) that exhausts to stack S51A-02-G.
- (f) Fiber Drying Equipment (Unit ID 89-01-G), installed October 1995. Wet fiber is fed to this natural and bio gas-fired dryer. Particulate matter is controlled by a scrubber (CE89-01-G) that exhausts to stack S89-01-G.
- (g) Rotary Feed Dryer (Unit ID 89-03-G), installed October 1995. Wet feed is fed to this natural and bio gas-fired dryer. Particulate emissions are controlled by four (4) recirculating cyclones. VOC emissions are controlled by a thermal oxidizer (CE89-03-TO) that normally exhausts to the Fiber Dryer Furnace but can exhaust to its own stack S89-03-G.
- (h) Corn Screenings to Grind 1 Feed Transfer (Unit ID 89-05-G), installed July 2000. Particulate emissions are controlled by a dust collector (CE89-05-G) that exhausts to stack S89-05-G.
- (i) Waxy Feed Drum Dryer (Unit ID 124-01-G), installed March 1980. Waxy corn fiber is fed to a rotary drum dryer. Particulate emissions are controlled by a wet scrubber (CE124-01-G) that exhausts to stack S124-01-G.
- (j) Germ Storage Silo (Unit ID 121-14-G), installed May 1996. Corn germ is pneumatically conveyed to this storage silo. Particulate emissions are controlled by a dust collector (CE121-14-G) that exhausts to stack S121-14-G.
- (k) Germ Dryer/Cooler (Unit ID 124A-01-G), installed November 1994. Corn germ is fed to this natural and bio gas-fired germ dryer and cooler. Particulate emissions are controlled by four (4) cyclones (CE124A-01-G) that exhaust to stack S124A-01-G.
- (l) Waxy Feed Mill Equipment (Unit ID 124-22-G), installed July 1976. Waxy corn fiber is milled and fed to a hopper equipped with a Flex-Kleen Bag Filter Collector (CE124-22-G) that exhausts to stack S124-22-G.
- (m) Corn Screenings to Grind 2 Feed Transfer (Unit ID 124-23-G), installed July 2000. Particulate emissions are controlled by a dust collector (CE124-23-G) that exhausts to stack S124-23-G.

- (n) Loose Feed Bin (Unit ID 201-05-G), installed October 2000. Particulate emissions are controlled by a bin vent (CE201-05-G) that exhausts to stack S201-05-G.
- (o) Hammermill #1 (Unit ID 201-01-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE201-01-G) that exhausts to stack S201-01-G.
- (p) Hammermill #2 (Unit ID 201-02-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE201-02-G) that exhausts to stack S201-02-G.
- (q) Pellet Cooler #1 (Unit ID 201-03-G), installed October 2000. Particulate emissions are controlled by a cyclone (CE201-03-G) that exhausts to stack S201-03-G.
- (r) Pellet Cooler #2 (Unit ID 201-04-G), installed October 2000. Particulate emissions are controlled by a cyclone (CE201-04-G) that exhausts to stack S201-04-G.
- (s) Central Vacuum Pelletizing (Unit ID 201-06-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE201-06-G) that exhausts to stack S201-06-G.
- (t) Central Vacuum Loadout (Unit ID 200-07-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE200-07-G) that exhausts to stack S200-07-G.
- (u) Pellet Silo #1 (Unit ID 200-01-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE200-01-G) that exhausts to stack S200-01-G.
- (v) Pellet Silo #2 (Unit ID 200-02-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE200-02-G) that exhausts to stack S200-02-G.
- (w) Loose Feed Silo (Unit ID 200-06-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE200-06-G) that exhausts to stack S200-06-G.
- (x) Gluten Silo (Unit ID 200-04-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE200-04-G) that exhausts to stack S200-04-G.
- (y) Germ Silo (Unit ID 200-03-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE200-03-G) that exhausts to stack S200-03-G.
- (z) Bulk Loadout (Unit ID 200-05-G), installed October 2000. Particulate emissions are controlled by a dust collector (CE200-05-G) that exhausts to stack S200-05-G.
- (aa) Corn Dump Pit (Unit ID 140-05-G), installed December 1995. Particulate emissions are controlled by a filter baghouse (CE140-05-G) that exhausts to stack S140-05-G.
- (bb) Corn Elevator Conveying (Unit ID 140-07-G), installed December 1995. Material is transferred from corn belt 1 to corn belt 2. Particulate emissions are controlled by a filter baghouse (CE140-07-G) that exhausts to stack S140-07-G.
- (cc) Corn Receiving and Storage, installed December 1995. This system includes six Storage Bins, each with its own bin vent for control of particulate emissions:
 - Bin #1: Unit ID 140-01-G
 - Bin #2: Unit ID 140-02-G
 - Bin #3: Unit ID 140-03-G
 - Bin #4: Unit ID 140-04-G
 - Bin #5: Unit ID 33-01-G
 - Bin #6: Unit ID 33-02-G

(dd) Gravity Take-up Conveyor (Corn Scale System) (Unit ID 140-06-G), installed December 1995. Corn is transferred from corn belt 2 to corn belt 3. Particulate emissions are controlled by a filter baghouse (CE140-06-G) that exhausts to stack S140-06-G.

(ee) Corn Cleaner (Unit ID 33-03-G), installed December 1995. Corn passes through mechanical cleaners. Particulate emissions are controlled by a filter baghouse (CE33-03-G) that exhausts to stack S33-03-G.

(ff) Corn Screenings System (Unit ID 30-16-G), installed July 1976. This system includes a dirt storage silo equipped with a bag filter collector (CE30-16-G) that exhausts to stack S30-16-G.

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

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

D.3.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1(d)]

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements), subsection (d), emissions of particulate matter less than ten microns in diameter (PM10) shall be limited to the following.

| | Unit ID | PM10 Limit (gr/dscf) | PM10 Limit (lbs/hr) |
|------|--|----------------------|---------------------|
| (a) | Gluten Dryer System (121-01-G) | 0.03 | 3.0 |
| (b) | First Stage Germ Dryer Receiver (21A-01-G) | 0.015 | 0.12 |
| (c) | First Stage Germ Dryer Exhaust (21A-02-G) | 0.01 | 0.67 |
| (d) | Second Stage Germ Dryer Receiver (51A-01-G) | 0.02 | 0.19 |
| (e) | Second Stage Germ Dryer Exhaust (51A-02-G) | 0.015 | 1.01 |
| (f) | Fiber Drying Equipment (89-01-G) | 0.01 | 4.5 |
| (g) | Rotary Feed Dryer (89-03-G) | 0.03 | 4.5 |
| (i) | Waxy Feed Drum Dryer (124-01-G) | 0.03 | 11.12 |
| (j) | Germ Storage Silo (121-14-G) | 0.01 | 0.1 |
| (k) | Germ Dryer/Cooler (124A-01-G) | 0.02 | 1.872 |
| (l) | Waxy Feed Mill Equipment (124-22-G) | 0.01 | 0.051 |
| (aa) | Corn Dump Pit (140-05-G) | 0.01 | 1.286 |
| (bb) | Corn Elevator Conveying (140-07-G) | 0.01 | 0.086 |
| (cc) | Corn Receiving and Storage Bins 1, 2, 3, & 4 | 0.02 each | 0.343 each |
| (cc) | Corn Receiving and Storage Day Tanks 5 & 6 | 0.02 each | 0.171 each |
| (dd) | Gravity Take-up Conveyor (140-06-G) | 0.01 | 0.154 |
| (ee) | Corn Cleaner (33-03-G) | 0.01 | 0.21 |
| (ff) | Corn Screenings System (30-16-G) | 0.01 | 0.06 |

D.3.2 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-2(h)]

Pursuant to Significant Source Modification 089-14389-00203, issued September 2001, and 326 IAC 6-1-2(h) (Nonattainment Area Particulate Limitations), emissions of particulate matter less than ten (10) microns in diameter (PM10) from the following units shall not exceed the following limitations:

| | Unit ID | PM10 Limit (gr/dscf) | PM10 Limit (lbs/hr) |
|-----|--|----------------------|---------------------|
| (h) | Dry Feed Transfer (89-05-G) | 0.01 | 0.09 |
| (m) | Corn Screen to Grind 2 Wet Feed Transfer | 0.01 | 0.086 |
| (n) | Loose Feed Bin (201-05-G) | 0.005 | 0.02 |
| (o) | Hammermill #1 (201-01-G) | 0.005 | 0.15 |
| (p) | Hammermill #2 (201-02-G) | 0.005 | 0.15 |
| (q) | Pellet Cooler #1 (Unit ID 201-03-G) | 0.015 | 1.66 |
| (r) | Pellet Cooler #2 (Unit ID 201-04-G) | 0.015 | 1.66 |
| (s) | Central Vacuum Pelletizing (201-06-G) | 0.005 | 0.02 |
| (t) | Central Vacuum Loadout (200-07-G) | 0.005 | 0.02 |
| (u) | Pellet Silo #1 (200-01-G) | 0.005 | 0.003 |
| (v) | Pellet Silo #2 (200-02-G), | 0.005 | 0.003 |
| (w) | Loose Feed Silo (200-06-G) | 0.005 | 0.02 |
| (x) | Gluten Silo (200-04-G) | 0.005 | 0.05 |
| (y) | Germ Silo (200-03-G) | 0.005 | 0.05 |
| (z) | Bulk Loadout (200-05-G) | 0.005 | 1.21 |

D.3.3 VOC Emissions [326 IAC 2-3] [326 IAC 8-1-6] [326 IAC 2-7-6(3)] [326 IAC 2-7-15]

The IDEM, OAQ has information that indicates that some emission units in this section are subject to the requirements of 326 IAC 2-3 (Emission Offset) and/or 326 IAC 8-1-6 (New facilities, general reduction requirements (BACT)). Therefore, the Permit Shield provided by Condition B.12 of this permit does not apply to those emission units with regards to 326 IAC 2-3 and 326 IAC 8-1-6. The IDEM, OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 2-3 or 326 IAC 8-1-6 and a schedule for achieving compliance with such requirements.

D.3.4 VOC Emissions [326 IAC 8-7] [326 IAC 2-7-6(3)] [326 IAC 2-7-15]

The IDEM, OAQ has information that indicates that some emission units in this section are subject to the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties). Therefore, the Permit Shield provided by Condition B.12 of this permit does not apply to those emission units with regards to 326 IAC 8-7. On February 27, 1995, the source submitted to IDEM, OAQ a Reasonably Achievable Control Technology (RACT) plan pursuant to 326 IAC 8-7-2. A revised RACT plan was requested and submitted by the source on August 22, 2003. The IDEM, OAQ is currently reviewing the RACT plan submitted. The IDEM, OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 8-7 and a schedule for achieving compliance with such requirements.

D.3.5 SO₂ Emissions [326 IAC 2-3] [326 IAC 2-7-6(3)] [326 IAC 2-7-15]

The IDEM, OAQ has information that indicates that some emission units in this section are subject to the requirements of 326 IAC 2-3 (Emission Offset). Therefore, the Permit Shield provided by Condition B.12 of this permit does not apply to those emission units with regards to 326 IAC 2-3. The IDEM, OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 2-3 and a schedule for achieving compliance with such requirements.

D.3.6 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to Significant Source Modification 089-14389-00203, issued September 2001, and 326 IAC 8-1-6, the Thermal Oxidizer for the Rotary Feed Dryer shall achieve a 90% reduction of VOC emissions.

D.3.7 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 each Grind and Feedhouse Area facility control device.

Compliance Determination Requirements

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

Within 36 months of the issuance of this permit, in order to demonstrate compliance with Conditions D.3.1 and D.3.2, the Permittee shall perform PM-10 testing on the following units utilizing methods as approved by the Commissioner.

- (a) Gluten Ring Dryer
- (b) Fiber Drying Equipment/Rotary Feed Dryer System

These tests 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.3.9 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1(d)] [326 IAC 6-1-2(h)]

In order to comply with D.3.1 and D.3.2, the control devices for PM10 control shall be in operation and control emissions from their associated facilities at all times that the facilities are in operation.

D.3.10 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The thermal oxidizer for VOC control shall be in operation and control emissions from the Rotary Feed Dryer at all times that the facility is in operation. The thermal oxidizer shall maintain a minimum operating temperature of 1200°F and a maximum flow rate of 35,000 acfm.

D.3.11 Parametric Monitoring (Thermal Oxidizer) [326 IAC 8-1-6]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The thermal oxidizer shall maintain a minimum operating temperature of 1200°F and a maximum flow rate of 35,000 acfm.
- (b) During normal operation, 100% of the gas stream from the Rotary Feed Dryer shall be captured and shall pass through the Thermal Oxidizer.
- (c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above-mentioned range for any one reading. 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.

Compliance Monitoring Requirements

D.3.12 Visible Emissions Notations

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

D.3.13 Parametric Monitoring (Dust Collectors)

The Permittee shall record the total static pressure drop across each particulate control device used in the Grind and Feedhouse Area at least once per day when the associated system is in operation. When for any one reading, the pressure drop across the control device is outside any of the following ranges or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM-OAQ and HDEM and shall be calibrated at least once every six (6) months or in accordance with the manufacturer's specifications provided those specifications are available on site with the Preventive Maintenance Plan.

D.3.14 Parametric Monitoring (Scrubbers)

The Permittee shall record the recirculation liquid flow rate and total static pressure drop across each scrubber used in the Grind and Feedhouse Area, at least once per day when the associated system is in operation. When for any one reading, the pressure drop across a scrubber is outside the following ranges or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

| | Unit ID | Control Equipment | Pressure Drop Range (inches of water) |
|------|--|------------------------|---------------------------------------|
| (a) | Gluten Ring Dryer System (121-01-G) | Wet Scrubber | 11 -17 |
| (b) | First Stage Germ Dryer Receiver (21A-01-G) | Cyclone | N/A |
| (c) | First Stage Germ Dryer Exhaust (21A-02-G) | Cyclone and Roto-clone | N/A |
| (d) | Second Stage Germ Dryer Receiver (51A-01-G) | Cyclone | N/A |
| (e) | Second Stage Germ Dryer Exhaust (51A-02-G) | Scrubber | TBD |
| (f) | Fiber Drying Equipment (89-01-G) | Scrubber | 0.1 - 6 |
| (g) | Rotary Feed Dryer (89-03-G) | 4 Cyclones | N/A |
| (h) | Dry Feed Transfer (89-05-G) | Dust Collector | 0.1 - 6 |
| (i) | Waxy Feed Drum Dryer (124-01-G) | Wet Scrubber | TBD |
| (j) | Germ Storage Silo (121-14-G) | Dust Collector | 0.1 - 6 |
| (k) | Germ Dryer/Cooler (124A-01-G) | 4 Cyclones | N/A |
| (l) | Waxy Feed Mill Equipment (124-22-G) | Dust Collector | 0.1 - 6 |
| (m) | Corn Screen to G2 Wet Feed Transfer (124-23-G) | Dust Collector | 0.1 - 6 |
| (n) | Loose Feed Bin Vent (201-05-G) | Bin Vent Filter | 0.1 - 6 |
| (o) | Hammermill #1 (201-01-G) | Dust Collector | 0.1 - 6 |
| (p) | Hammermill #2 (201-02-G) | Dust Collector | 0.1 - 6 |
| (q) | Pellet Cooler #1 (201-03-G) | Cyclone | N/A |
| (r) | Pellet Cooler #2 (201-04-G) | Cyclone | N/A |
| (s) | Central Vacuum Pelletizing (201-06-G) | Dust Collector | 0.1 - 6 |
| (t) | Central Vacuum Loadout (200-07-G) | Dust Collector | 0.1 - 6 |
| (u) | Pellet Silo #1 (200-01-G) | Dust Collector | 0.1 - 6 |
| (v) | Pellet Silo #2 (200-02-G) | Dust Collector | 0.1 - 6 |
| (w) | Loose Feed Silo (200-06-G) | Dust Collector | 0.1 - 6 |
| (x) | Gluten Silo (200-04-G) | Dust Collector | 0.1 - 6 |
| (y) | Germ Silo (200-03-G) | Dust Collector | 0.1 - 6 |
| (z) | Bulk Loadout (200-05-G) | Dust Collector | 0.1 - 6 |
| (aa) | Corn Dump Pit (140-05-G) | Dust Collector | 0.1 - 6 |
| (bb) | Corn Elevator Conveying (140-07-G) | Dust Collector | 0.1 - 6 |
| (cc) | Corn Receiving and Storage Silos (6) | Bin Vents | NA |
| (dd) | Gravity Take-up Conveyor (140-06-G) | Dust Collector | 0.1 - 6 |
| (ee) | Corn Cleaner (33-03-G) | Dust Collector | 0.1 - 6 |
| (ff) | Corn Screenings System (30-16-G) | Dust Collector | 0.1 - 6 |

D.3.15 Baghouse (Dust Collector) Inspections

An inspection shall be performed each calendar quarter of all bags that control particulate emissions. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.3.16 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 is observed and it will be 10 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 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, or dust traces, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.3.17 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones used as control devices.

D.3.18 Cyclone Failure Detection

In the event that cyclone failure has been observed:

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

D.3.19 Scrubber Inspections

An inspection shall be performed each calendar quarter of all scrubbers used as control devices. Defective scrubber parts shall be replaced. A record shall be kept of the results of the inspection and any corrective actions taken.

D.3.20 Scrubber Failure Detection

In the event that a scrubber's failure has been observed:

- (a) The affected unit will be shut down immediately until the failed unit has been replaced.
- (b) Based on the confirmed findings of an 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.3.21 Record Keeping Requirements

- (a) To document compliance with Condition D.3.12, the Permittee shall maintain records of visible emission notations of the Grind and Feedhouse Area Facility stack exhausts.
- (b) To document compliance with Condition D.3.13 and D.3.14, the Permittee shall maintain daily records of the total static pressure drop readings and the scrubber recirculation liquid flow rates.
- (c) To document compliance with Condition D.3.11, the Permittee shall record the thermal oxidizer operating temperature once per day when the unit is operating. The Permittee shall also have a record of the operating temperature used to demonstrate compliance during the most recent compliance stack test.
- (d) To document compliance with Condition D.3.15, D.3.17, and D.3.19, the Permittee shall maintain records of the results of the inspections.
- (e) 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)]: | <u>IV. Utility Area</u> |
| The Utility area includes six (6) boilers used to supply steam for plant processes. A small rental, natural gas-fired boiler is used when all boilers are down for maintenance. | |
| (a) Boiler No. 1 (Unit ID 10-01-U), Combustion Engineering Model VP10R, installed in 1960, with a maximum rate of 96 MMBtu/hr heat input and natural gas-fired only. This unit exhausts through stack S10-01-U. | |
| (b) Boiler No. 2 (Unit ID 10-02-U), Erie City Model 19M, installed in 1966, with a maximum rate of 160 MMBtu/hr heat input and natural gas-fired only. This unit exhausts through stack S10-02-U. | |
| (c) Boiler No. 6 (Unit ID 10-03-U), Combustion Engineering Model VU-50, installed in 1956, with a maximum rate of 200 MMBtu/hr heat input and natural gas-fired with a fuel oil #6 secondary capability. This unit exhausts through stack S10-03-U. | |
| (d) Boiler No. 7 (Unit ID 10-04-U), Combustion Engineering Model VU, installed in 1944, with a maximum rate of 120 MMBtu/hr heat input and natural gas-fired with a fuel oil #6 secondary capability. This unit also exhausts through stack S10-03-U. | |
| (e) Boiler No. 8 (Unit ID 10-05-U), Combustion Engineering Model VU, installed in 1937, with a maximum rate of 120 MMBtu/hr heat input and natural gas-fired with a fuel oil #6 secondary capability. This unit exhausts through stack S10-05-U. | |
| (f) Boiler No. 10 (Unit ID 10-06-U), Combustion Engineering Model VU, installed in 1937, with a maximum rate of 120 MMBtu/hr heat input and natural gas-fired with a fuel oil #6 secondary capability. This unit also exhausts through stack S10-05-U. | |
| (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.) | |

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

D.4.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1(h)]

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements), subsection (h), Boilers #1 and #2 shall fire natural gas only and emissions of particulate matter less than ten microns in diameter (PM10) shall be limited to the following.

| Unit ID | PM10 Limit (lbs/MMBtu) | PM10 Limit (lbs/hr) |
|-----------|------------------------|---------------------|
| Boiler #1 | 0.003 | 0.288 |
| Boiler #2 | 0.003 | 0.468 |

D.4.2 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1(d)]

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements), subsection (d), emissions of particulate matter less than ten microns in diameter (PM10) shall be limited to the following.

| Unit ID | PM10 Limit |
|------------------------------|-------------|
| Stack Serving Boilers 6 & 7 | 30.3 lbs/hr |
| Stack Serving Boilers 8 & 10 | 22.7 lbs/hr |

D.4.3 Sulfur Dioxide (SO₂) [326 IAC 7-4-1.1]

Pursuant to 326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations) sulfur dioxide emissions are limited to 2.07 lbs/MMBtu (each) for boilers 6, 7, 8, and 10 (784 lbs/hr total).

D.4.4 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 each Utility Area Boiler.

Compliance Determination Requirements

D.4.5 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 3-7-4]

Compliance with Condition D.4.3 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 6, 7, 8, and 10 do not exceed (2.07) pound per million Btu heat input (each) 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 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 boilers 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

D.4.6 Visible Emissions Notations

- (a) Visible emission notations of each boiler stack exhaust shall be performed once per day (when burning fuel oil) during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) A continuous opacity monitor may be used to perform the visible emission notations provided the calibration and maintenance procedures for the monitor have been approved by the IDEM-OAQ or the HDEM. A trained employee shall record whether emissions are normal or abnormal (when burning fuel oil).
- (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.

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

D.4.7 Record Keeping Requirements

- (a) In accordance with 326 IAC 7-4-1.1(c)(1)(B)(i) and in order to document compliance with Condition D.4.3, the Permittee shall maintain records of the following for each hour in which any boiler operates on fuel oil.
 - (1) Average sulfur content
 - (2) Fuel oil usage
 - (3) Boiler operating load
- (b) To document compliance with Condition D.4.6, the Permittee shall maintain records of the visible emission notations (while burning fuel oil) of the boiler stack exhausts.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.8 Reporting Requirements

- (a) In accordance with 326 IAC 7-2-1(c)(3) and 326 IAC 7-4-1.1(c)(1)(B)(ii), the Permittee shall submit a report to the department within thirty (30) days after the end of each calendar quarter. The report shall also contain the records required in Condition D.4.7 for Boilers 6, 7, 8, and 10, while burning fuel oil, including a calculation of the total sulfur dioxide emissions from all boilers for each hour.
- (b) The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or its equivalent, within thirty (30) days after the end of the calendar quarter being reported. The natural gas-fired boiler certification does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.5 FACILITY OPERATION CONDITIONS

| Facility Description [326 IAC 2-7-5(15)]: | <u>V. Refinery Area</u> |
|---|-------------------------|
| <p>(a) Corn Syrup Solids Manufacturing System #2 (Unit ID 18-03-R), installed July 1992. Corn syrup solids are fed through a cooling tunnel, milled, screened, and dropped to a receiver for packing. Particulate emissions are controlled by a jet pulse dust collector (CE18-03-R) that exhausts to stack S18-03-R.</p> | |
| <p>(b) Corn Syrup Spray Dryer #4 (Unit ID 100-03-R), installed April 1992. Corn syrup is fed to a dryer. The solids are sent through cyclones to a packing area. Particulate emissions are controlled by a wet scrubber (CE100-03-R) that exhausts to stack S100-03-R.</p> | |
| <p>(c) Corn Syrup Spray Dryer/Cooler System #3 (Unit ID 100-01-R), installed July 1987. Corn syrup is fed to a dryer. The solids are sent through cyclones to a packing area. Particulate emissions are controlled by a wet venturi scrubber (CE100-01-R) that exhausts through stack S100-01-R.</p> | |
| <p>(d) Activated Carbon Regeneration Furnace #2 (Unit ID 104-01-R), installed July 1995. Spent carbon is regenerated in this natural gas-fired furnace. Emissions are controlled by a venturi scrubber and an impingement furnace scrubber (CE104-01-R) that exhaust through stack S104-01-R.</p> | |
| <p>(e) Soda Ash Tank (Unit ID 104-02-R), installed July 1995. Particulate emissions from loading this tank are controlled by a venturi scrubber (CE104-02-R) that exhausts to stack S104-02-R.</p> | |
| <p>(f) Filter Aid Hopper (Unit ID 104-03-R), installed July 1995. This hopper is equipped with a jet pulse baghouse (CE104-03-R) that exhausts to stack S104-03-R.</p> | |
| <p>(g) Sodium Bisulfite Bag Dump (Unit ID 104-05-R), installed July 1995. This unit is controlled by a jet pulse baghouse (CE104-05-R) that exhausts to stack S104-05-R.</p> | |
| <p>(h) Diatomaceous Earth Unloading (Unit ID 104-08-R), installed November 1998. Diatomaceous earth (filter aid) is unloaded from railcar to Silo. Particulate emissions are controlled by a Bin Vent Filter (DC2312) that exhausts to stack S104-08-R.</p> | |
| <p>(i) Citric Acid Dump Station (Unit ID 104-09-R), installed November 1998. Citric Acid is added during the production of corn syrup. Particulate emissions are controlled by a dust collector (CE104-09-R) that exhausts to stack S104-09-R.</p> | |
| <p>(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)</p> | |

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

D.5.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1(d)]

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements), subsection (d), emissions of particulate matter less than ten microns in diameter (PM10) shall be limited to the following:

| | Unit ID | PM10 Limit | PM10 Limit |
|-----|---|------------|------------|
| (a) | Corn Syrup Solids Mfg System #2 (18-03-R) | 0.01 | 0.30 |
| (b) | Corn Syrup Spray Dryer #4 (100-03-R) | 0.01 | 4.2 |
| (c) | Corn Syrup Spray Dryer/Cooler System #3 (100-01-R) | 0.015 | 4.96 |
| (d) | Activated Carbon Regeneration Furnace #2 (104-01-R) | 0.015 | 0.728 |

| | | | |
|-----|--------------------------------------|------|-------|
| (e) | Soda Ash Tank (104-02-R) | 0.02 | 0.154 |
| (f) | Filter Aid Hopper (104-03-R) | 0.02 | 0.044 |
| (g) | Sodium Bisulfite Bag Dump (104-05-R) | 0.02 | 0.080 |

D.5.2 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-2(h)]

Pursuant to CP 089-1230-00203, issued November 1998, and 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), subsection (h), emissions of particulate matter less than ten microns in diameter (PM10) shall be limited to the following:

| | Unit ID | PM10 Limit | PM10 Limit |
|-----|--|------------|------------|
| (h) | Diatomaceous Earth Unloading Silo (104-08-R) | 0.01 | 0.064 |
| (i) | Citric Acid Dump Station (104-09-R) | 0.01 | 0.026 |

D.5.3 VOC Emissions [326 IAC 2-3] [326 IAC 8-1-6] [326 IAC 2-7-6(3)] [326 IAC 2-7-15]

The IDEM, OAQ has information that indicates that some emission units in this section are subject to the requirements of 326 IAC 2-3 (Emission Offset) and/or 326 IAC 8-1-6 (New facilities, general reduction requirements (BACT)). Therefore, the Permit Shield provided by Condition B.12 of this permit does not apply to those emission units with regards to 326 IAC 2-3 and 326 IAC 8-1-6. The IDEM, OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 2-3 or 326 IAC 8-1-6 and a schedule for achieving compliance with such requirements.

D.5.4 VOC Emissions [326 IAC 8-7] [326 IAC 2-7-6(3)] [326 IAC 2-7-15]

The IDEM, OAQ has information that indicates that some emission units in this section are subject to the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties). Therefore, the Permit Shield provided by Condition B.12 of this permit does not apply to those emission units with regards to 326 IAC 8-7. On February 27, 1995, the source submitted to IDEM, OAQ a Reasonably Achievable Control Technology (RACT) plan pursuant to 326 IAC 8-7-2. A revised RACT plan was requested and submitted by the source on August 22, 2003. The IDEM, OAQ is currently reviewing the RACT plan submitted. The IDEM, OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 8-7 and a schedule for achieving compliance with such requirements.

D.5.5 CO Emissions [326 IAC 2-2] [326 IAC 2-7-6(3)] [326 IAC 2-7-15]

The IDEM, OAQ has information that indicates that some emission units in this section are subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration). Therefore, the Permit Shield provided by Condition B.12 of this permit does not apply to those emission units with regards to 326 IAC 2-2 (PSD). The IDEM, OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 2-2 (PSD) and a schedule for achieving compliance with such requirements.

D.5.6 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 each Refinery Area facility control device.

Compliance Determination Requirements

D.5.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 36 months of the issuance of this permit, in order to demonstrate compliance with Condition D.5.1, the Permittee shall perform PM-10 testing on the following units utilizing methods as approved by the Commissioner.

- (a) Corn Syrup Spray Dryer #4
- (b) Corn Syrup Spray Dryer/Cooler #3

These tests 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.5.8 Particulate Matter less than 10 microns in diameter (PM10)

In order to comply with D.5.1 and D.5.2, the control devices for PM10 control shall be in operation and control emissions from each facility at all times that the facility is in operation.

Compliance Monitoring Requirements

D.5.9 Visible Emissions Notations

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

D.5.10 Parametric Monitoring (Dust Collectors)

The Permittee shall record the total static pressure drop across the control device used in conjunction with each Refinery Area facility as listed below, at least once per day, when the associated facility is in operation. When for any one reading, the pressure drop across the baghouse or dust collector is outside any of the following ranges or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit.

Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM-OAQ and HDEM and shall be calibrated at least once every six (6) months or in accordance with the manufacturer's specifications provided those specifications are available on site with the Preventive Maintenance Plan.

D.5.11 Parametric Monitoring (Scrubbers)

The Permittee shall record the recirculation liquid flow rate and total static pressure drop across each scrubber used in the Refinery Area, at least once per day when the associated system is in operation. When for any one reading, the pressure drop across a scrubber is outside the following ranges or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

| | Unit ID | Control Equipment | Pressure Drop Range (inches of water) |
|-----|---|-------------------|---------------------------------------|
| (a) | Corn Syrup Solids Mfg System #2 (18-03-R) | Dust Collector | 5 - 15 |
| (b) | Corn Syrup Spray Dryer #4 (100-03-R) | Wet Scrubber | 1.0 – 8.0 |
| (c) | Corn Syrup Spray Dryer/Cooler System #3 (100-01-R) | Wet Scrubber | 0.1 - 6 |
| (d) | Activated Carbon Regeneration Furnace #2 (104-01-R) | Wet Scrubber | TBD |
| (e) | Soda Ash Tank (104-02-R) | Wet Scrubber | 0.25 – 0.5 |
| (f) | Filter Aid Hopper (104-03-R) | Dust Collector | 0.1 - 6 |
| (g) | Sodium Bisulfite Bag Dump (104-05-R) | Dust Collector | 0.1 - 6 |
| (h) | Diatomaceous Earth Unloading Silo (104-08-R) | Bin Vent Filter | 0.1 - 6 |
| (i) | Citric Acid Dump Station (Unit ID 104-09-R). | Dust Collector | 0.1 - 6 |

D.5.12 Baghouse (Dust Collector) Inspections

An inspection shall be performed each calendar quarter of all bags that control particulate emissions. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.5.13 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 is observed and it will be 10 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 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, or dust traces, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.5.14 Scrubber Inspections

An inspection shall be performed each calendar quarter of all scrubbers used as control devices. Defective scrubber parts shall be replaced. A record shall be kept of the results of the inspection and any corrective actions taken.

D.5.15 Scrubber Failure Detection

In the event that a scrubber's failure has been observed:

- (a) The affected unit will be shut down immediately until the failed unit has been replaced.
- (b) Based on the confirmed findings of an 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.5.16 Record Keeping Requirements

- (a) To document compliance with Condition D.5.9, the Permittee shall maintain records of the visible emission notations of the Refinery Area Facility stack exhausts.
- (b) To document compliance with Conditions D.5.10 and D.5.11, the Permittee shall maintain a daily record of the total static pressure drop readings and the scrubber recirculation liquid flow rates.
- (c) To document compliance with Condition D.5.12 and D.5.14, the Permittee shall maintain records of the results of the inspections.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.6

FACILITY OPERATION CONDITIONS

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

VI. Starch Production Area

- (a) Batch Scale Hopper #1 (Unit ID 34-01-S), installed January 1991. Starch is pneumatically conveyed to a hopper. Particulate emissions are controlled by a bag filter dust collector (CE34-01-S) that exhausts to stack S34-01-S.
- (b) Dextrin Starch Reactor #1 (Unit ID 34-02-S), installed January 1991. Dried cornstarch is fed to a reactor heated by steam from the plant boilers. Particulate emissions are controlled by a bag filter dust collector (CE34-02-S) that exhausts to stack S34-02-S.
- (c) Dextrin Starch Cooler #1 (Unit ID 34-03-S), installed January 1991. Roasted cornstarch is fed to a cooler and transferred to a hopper for storage. Particulate emissions are controlled by a bag filter dust collector (CE34-03-S) that exhausts to stack S34-03-S.
- (d) Surge Hopper #1 (Unit ID 34-05-S), installed January 1991. Starch is pneumatically conveyed to a hopper. Particulate emissions are controlled by a bag filter dust collector (CE34-05-S) that exhausts to stack S34-05-S.
- (e) Dextrin Feed Hoppers #1 and #2 (System #1) (Unit IDs 34-06-S and 34-07-S), installed April 1993. Starch is gravity conveyed to these hoppers. Particulate emissions are controlled by bag filter dust collectors (CE34-06-S and CE34-07-S) that exhaust to stacks S34-06-S and S34-07-S.
- (f) Batch Scale Hopper #2 (Unit ID 34B-13-S), installed October 1993. Starch is pneumatically conveyed to a hopper. Particulate emissions are controlled by a bag filter dust collector (CE34B-13-S) that exhausts to stack S34B-13-S.
- (g) Dextrin Starch Reactor #2 (Unit ID 34B-04-S), installed October 1993. Dried cornstarch is fed to a reactor heated by steam from the plant boilers. Particulate emissions are controlled by a bag filter dust collector (CE34B-04-S) that exhausts to stack S34B-04-S.
- (h) Dextrin Starch Cooler #2 (Unit ID 34B-01-S), installed October 1993. Roasted cornstarch is fed to a cooler and transferred to a hopper for storage. Particulate emissions are controlled by a bag filter dust collector (CE34B-01-S) that exhausts to stack S34B-01-S.
- (i) Surge Hopper #2 (Unit ID 34B-03-S), installed October 1993. Starch is pneumatically conveyed to a hopper. Particulate emissions are controlled by a bag filter dust collector (CE34B-03-S) that exhausts to stack S34B-03-S.
- (j) Dextrin Feed Hoppers #3 and #4 (System #2) (Unit IDs 34B-05-S and 34B-06-S), installed October 1993. Starch is gravity conveyed to these hoppers. Particulate emissions are controlled by dust collectors (CE34B-05-S and CE34B-06-S) that exhaust to stacks S34B-05-S and S34B-06-S.
- (k) Dextrin Bulk Loading Equipment (Unit ID 48-09-S), installed before 1977. Starch is pneumatically conveyed to this hopper. Particulate emissions are controlled by a bag filter dust collector (CE48-09-S) that exhausts to stack S48-09-S.
- (l) Starch Ring Dryer #2 (Unit ID 59-03-S), installed November 1993. Starch is fed to this natural gas-fired ring dryer. Dried starch is collected with six cyclones in series. Particulate emissions are controlled by a wet scrubber (CE59-03-S) that exhausts to stack S59-03-S.

- (m) Starch Milling Systems #1 and #2 (Unit IDs 59-01-S and 59-02-S), installed July 1976. Dried cornstarch is milled and transferred to storage. Particulate emissions are controlled by bag filter dust collectors (CE59-01-S and CE59-02-S) that exhaust to stacks S59-01-S and S59-02-S.
- (n) Starch Ring Dryer #3 (Unit ID 125-01-S), installed May 1980. Corn starch is fed to this natural gas-fired ring dryer. Dried starch is collected with six cyclones in series. Particulate emissions are controlled by a wet scrubber (CE125-01-S) that exhausts to stack S125-01-S.
- (o) Special Starch Process with Starch Ring Dryer #4 (Unit ID 128-01-S), installed December 1993. Corn starch is fed to this natural gas-fired ring dryer. Dried starch is collected with six cyclones in series. Particulate emissions are controlled by wet scrubber (CE128-01-S) that exhausts to stack S128-01-S.
- (p) Reactors #1 through 8 (Unit IDs 128-06-S through 128-13-S) installed November 1988 (1-4) and December 1991 (5-8). Corn starch and propylene oxide are reacted through Reactors 2, 3, 4, and 7 only. When propylene oxide is used in the starch reaction, VOC emissions are controlled by a thermal oxidizer that exhausts to stack S128-14-S.
- (q) Sodium Sulfate Storage Bin (Unit ID 128-25-S), installed October 2000. Particulate emissions are controlled by a bin vent dust collector (FA1900) that exhausts to stack S128-25-S.
- (r) Sodium Sulfate Weigh Bin (Unit ID 128-26-S), installed October 2000. Particulate emissions are controlled by a bin vent dust collector (FA1950) that exhausts to stack S128-26-S.
- (s) Cornstarch Storage Bins #20 through #36 (Unit IDs 120-01-S through 120-17-S), installed July 1990. Cornstarch is pneumatically conveyed to these storage bins. Particulate emissions are controlled by bin vent dust collectors that exhaust to stacks S120-01-S through S120-17-S.
- (t) Waxy Cornstarch Bulk Storage Bins #95 through #98 (Unit IDs 126-01-S through 126-04-S), replaced in January 1996. Waxy corn starch is conveyed to these bins. Particulate emissions are controlled by dust collectors (CE126-01-S through CE126-04-S) that exhaust to stacks S126-01-S through S126-04-S.
- (u) Cornstarch Blending Systems #1 through #4 (Unit IDs 130-01-S through 130-04-S), installed April 1988. Corn starch is blended and moved to the warehouse for packing. Particulate emissions are controlled by bag filter dust collectors (CE130-01-S through CE130-04-S) that exhaust to stacks S130-01-S through S130-04-S.
- (v) Dextrin Blender (Unit ID 130-05-S), installed October 1993. Corn starch is blended and moved to the warehouse for packing. Particulate emissions are controlled by a dust collector (CE130-05-S) that exhausts to stack S130-05-S.
- (w) One (1) 28,000 gallon horizontal propylene oxide tank (Unit ID 93-18-S), installed 1988, with 95% efficient vapor recovery (liquid nitrogen condenser). This tank also provides propylene oxide for other starch processes.

(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 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1(d)]

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements), subsection (d), emissions of particulate matter less than ten microns in diameter (PM10) shall be limited to the following.

| | Unit ID | PM10 Limit | PM10 Limit |
|-----|---|------------|------------|
| (a) | Batch Scale Hopper #1 (34-01-S) | 0.01 | 0.04 |
| (b) | Dextrin Starch Reactor #1 (34-02-S) | 0.01 | 0.180 |
| (c) | Dextrin Starch Cooler #1 (34-03-S) | 0.01 | 0.042 |
| (d) | Surge Hopper #1 (34-05-S) | 0.01 | 0.11 |
| (e) | Dextrin Feed Hoppers #1 and #2 (34-06-S & 34-07-S) | 0.01 each | 0.030 each |
| (f) | Batch Scale Hopper #2 (34B-13-S) | 0.01 | 0.067 |
| (g) | Dextrin Starch Reactor #2 (34B-04-S) | 0.01 | 0.179 |
| (h) | Dextrin Starch Cooler #2 (34B-01-S) | 0.01 | 0.042 |
| (i) | Surge Hopper #2 (34B-03-S) | 0.01 | 0.114 |
| (j) | Dextrin Feed Hoppers #3 and #4 (34B-05-S & 34B-06-S) | 0.01 each | 0.030 each |
| (k) | Dextrin Bulk Loading Equipment (48-09-S) | 0.01 | 0.26 |
| (l) | Starch Ring Dryer #2 (59-03-S) | 0.006 | 3.50 |
| (m) | Starch Milling Systems #1 and #2 (59-01-S and 59-02-S) | 0.01 each | 0.43 each |
| (n) | Starch Ring Dryer #3 (125-01-S) | 0.006 | 3.50 |
| (o) | Special Starch Process / Starch Ring Dryer #4 (128-01-S) | 0.01 | 3.5 |
| (s) | Cornstarch Storage Bins 20-36 (120-01-S to 120-17-S) | 0.01 each | 0.56 each |
| (t) | Waxy Cornstarch Storage Bins 95-98 (126-01-S to 126-04-S) | 0.01 each | 0.16 each |
| (u) | Cornstarch Blending Systems 1-4 (130-01-S to 130-04-S) | 0.01 | 0.42 |
| (v) | Dextrin Blender (130-05-S) | 0.01 | 0.248 |

D.6.2 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-2(h)]

Pursuant to CP 089-01531-00203, issued November 1999, and 326 IAC 6-1-2 (Non-attainment Area Particulate Limitations), subsection (h), emissions of particulate matter less than ten microns in diameter (PM10) shall be limited to the following.

| | Unit ID | PM10 Limit (gr/dscf) | PM10 Limit (lbs/hr) |
|-----|---------------------------------------|----------------------|---------------------|
| (q) | Sodium Sulfate Storage Bin (128-25-S) | 0.005 | 0.03 |
| (r) | Sodium Sulfate Weigh Bin (128-26-S) | 0.005 | 0.03 |

D.6.3 VOC Emissions [326 IAC 2-3] [326 IAC 8-1-6] [326 IAC 2-7-6(3)] [326 IAC 2-7-15]

The IDEM, OAQ has information that indicates that some emission units in this section are subject to the requirements of 326 IAC 2-3 (Emission Offset) and/or 326 IAC 8-1-6 (New facilities, general reduction requirements (BACT)). Therefore, the Permit Shield provided by Condition B.12 of this permit does not apply to those emission units with regards to 326 IAC 2-3 and 326 IAC 8-1-6. The IDEM, OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 2-3 or 326 IAC 8-1-6 and a schedule for achieving compliance with such requirements.

D.6.4 VOC Emissions [326 IAC 8-7] [326 IAC 2-7-6(3)] [326 IAC 2-7-15]

The IDEM, OAQ has information that indicates that some emission units in this section are subject to the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties). Therefore, the Permit Shield provided by Condition B.12 of this permit does not apply to those emission units with regards to 326 IAC 8-7. On February 27, 1995, the source submitted to IDEM, OAQ a Reasonably Achievable Control Technology (RACT) plan pursuant to 326 IAC 8-7-2. A revised RACT plan was requested and submitted by the

source on August 22, 2003. The IDEM, OAQ is currently reviewing the RACT plan submitted. The IDEM, OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 8-7 and a schedule for achieving compliance with such requirements.

D.6.5 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 each Starch Production Area facility control device.

Compliance Determination Requirements

D.6.6 Testing Requirements (PM10) [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 36 months of the issuance of this permit, in order to demonstrate compliance with Condition D.6.1, the Permittee shall perform PM-10 testing on the following units utilizing methods as approved by the Commissioner.

- (1) Starch Ring Dryer #2
- (2) Starch Ring Dryer #3
- (3) Special Starch Process w/ Starch Ring Dryer #4

These tests 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.6.7 Volatile Organic Compounds (VOC) [326 IAC 2-1.1-5] [326 IAC 8-7-9] [326 IAC 8-7-10]

The thermal oxidizer for VOC control for Reactors 2, 3, 4, and 7 shall be installed, calibrated, maintained, and operated, at a minimum, according to the manufacturer's specifications and recommendations.

D.6.8 Particulate Matter less than 10 microns in diameter (PM10)

In order to comply with D.6.1 and D.6.2, the control devices for PM10 control shall be in operation and control emissions from each facility at all times that the facility is in operation.

Compliance Monitoring Requirements

D.6.9 Visible Emissions Notations

- (a) Visible emission notations of each Starch Production Area facility stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.6.10 Parametric Monitoring (Dust Collectors)

The Permittee shall record the total static pressure drop across the control device used in conjunction with each Starch Production Area facility as listed below, at least once per day when the associated facility is in operation. When for any one reading, the pressure drop across the baghouse or dust collector is outside any of the following ranges or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM-OAQ and HDEM and shall be calibrated at least once every six (6) months or in accordance with the manufacturer's specifications provided those specifications are available on site with the Preventive Maintenance Plan.

| | Unit ID | Control Equipment | Pressure Drop Range |
|-----|---|-------------------|---------------------|
| (a) | Batch Scale Hopper #1 (34-01-S) | Dust Collector | 0.1 - 6 |
| (b) | Dextrin Starch Reactor #1 (34-02-S) | Dust Collector | 0.1 - 6 |
| (c) | Dextrin Starch Cooler #1 (34-03-S) | Dust Collector | 0.1 - 6 |
| (d) | Surge Hopper #1 (34-05-S) | Dust Collector | 0.1 - 6 |
| (e) | Dextrin Feed Hoppers #1 and #2 (34-06-S & 34-07-S) | Dust Collectors | 0.1 – 6 each |
| (f) | Batch Scale Hopper #2 (34B-13-S) | Dust Collector | 0.1 - 6 |
| (g) | Dextrin Starch Reactor #2 (34B-04-S) | Dust Collector | 0.1 - 6 |
| (h) | Dextrin Starch Cooler #2 (34B-01-S) | Dust Collector | 0.1 - 6 |
| (i) | Surge Hopper #2 (34B-03-S), | Dust Collector | 0.1 - 6 |
| (j) | Dextrin Feed Hoppers #3 and #4 (34B-05-S & 34B-06-S) | Dust Collector | 0.1 – 6 each |
| (k) | Dextrin Bulk Loading Equipment (48-09-S) | Dust Collector | 0.1 - 6 |
| (l) | Starch Ring Dryer #2 (59-03-S) | Wet Scrubber | 10 - 20 |
| (m) | Starch Milling Systems #1 and #2 (59-01-S and 59-02-S) | Dust Collectors | 0.1 - 6 each |
| (n) | Starch Ring Dryer #3 (125-01-S) | Wet Scrubber | 5 - 17 |
| (o) | Special Starch Process / Starch Ring Dryer #4 (128-01-S) | Wet Scrubber | 0.1 - 10 |
| (q) | Sodium Sulfate Storage Bin (128-25-S) | Dust Collector | 0.1 - 6 |
| (r) | Sodium Sulfate Weigh Bin (128-26-S) | Dust Collector | 0.1 - 6 |
| (s) | Cornstarch Storage Bins 20-36 (120-01-S to 120-17-S) | Dust Collectors | 0.1 - 6 each |
| (t) | Waxy Cornstarch Storage Bins 95-98 (126-01-S to 126-04-S) | Dust Collectors | 0.1 - 6 each |
| (u) | Cornstarch Blending Systems 1-4 (130-01-S to 130-04-S) | Dust Collectors | 0.1 - 6 each |
| (v) | Dextrin Blender (130-05-S) | Dust Collector | 0.1 - 6 |

D.6.11 Parametric Monitoring (Thermal Oxidizer) [326 IAC 2-1.1-5] [326 IAC 8-7-9] [326 IAC 8-7-10]

The thermal oxidizer for VOC control shall be in operation when propylene oxide is being added to special starch Reactors 2, 3, 4, and 7. The thermal oxidizer shall maintain a minimum operating temperature of 1300 °F and a maximum flow rate of 1000 acfm.

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The flow of propylene oxide shall be automatically interrupted when that temperature falls below 1300 °F or the temperature established during the most recent compliant stack test.
- (b) 100% of the vapors, when using propylene oxide in starch Reactors 2, 3, 4, and 7, shall be captured and shall pass through the Thermal Oxidizer.
- (c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above-mentioned range for any one reading. 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.6.12 Baghouse (Dust Collector) Inspections

An inspection shall be performed each calendar quarter of all bags that control particulate emissions. Inspections required by this condition shall not be performed in consecutive months. 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 is observed and it will be 10 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 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, or dust traces, 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.6.14 Record Keeping Requirements

- (b) To document compliance with Condition D.6.9, the Permittee shall maintain records of visible emission notations of the Starch Production Area facility stack exhausts.
- (b) To document compliance with Condition D.6.10, the Permittee shall maintain daily records of the total static pressure drop readings.
- (c) To document compliance with Condition D.6.11, the Permittee shall maintain records of the thermal oxidizer temperature once per day when operating.
- (d) To document compliance with Condition D.6.12, the Permittee shall maintain records of the results of the inspections.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.7 FACILITY OPERATION CONDITIONS

| Facility Description [326 IAC 2-7-5(15)]: | VII. Starch Warehouse Area |
|--|---|
| (a) Channel 2 Receiver (Unit ID 93-32-W), installed September 2000. | Particulate emissions are controlled by a filter dust collector that exhausts to stack S93-32-W. |
| (b) Channel 3 Receiver (Unit ID 93-33-W), installed September 2000. | Particulate emissions are controlled by a filter dust collector that exhausts to stack S93-33-W. |
| (c) Channel 4 Receiver (Unit ID 93-34-W), installed September 2000. | Particulate emissions are controlled by a filter dust collector that exhausts to stack S93-34-W. |
| (d) Channel 6 Receiver (Unit ID 93-35-W), installed September 2000. | Particulate emissions are controlled by a filter dust collector that exhausts to stack S93-35-W. |
| (e) Channel 4/6 Packing (Unit ID 93-37-W), installed September 2000. | Particulate emissions are controlled by a filter dust collector that exhausts to stack S93-37-W. |
| (f) Channel 2/3 Packing (Unit ID 93-36-W), installed September 2000. | Particulate emissions are controlled by a filter dust collector that exhausts to stack S93-36-W. |
| (g) Central Vacuum System (Unit ID 93-38-W), installed October 2000. | Particulate emissions are controlled by a filter dust collector that exhausts to stack S93-38-W. |
| (h) Dried Corn Syrup Conveying System (Unit ID 93-04-W), installed July 1976. | Particulate emissions are controlled by a baghouse (CE93-04-W) that exhausts to stack S93-04-W. |
| (i) Corn Syrup Solids Conveying System (Unit ID 93-05-W), installed July 1976. | Particulate emissions are controlled by a baghouse (CE93-05-W) that exhausts to stack S93-05-W. |
| (j) Frodex Semi-bulk Packing System (Unit ID 93-08-W), installed September 1989. | Particulate emissions are controlled by a baghouse (CE93-08-W) that exhausts to stack S93-08-W. |
| (k) Cornstarch Bag Dumping Stations #1 and #2 (Unit IDs 93-09-W and 93-10-W), installed April 1988. | Particulate emissions are controlled by bag filter dust collectors (CE93-09-W and CE93-10-W) that exhaust to stacks S93-09-W and S93-10-W. |
| (l) Starch Bulk Loading (Unit ID 93-14-W), installed April 1995. | Particulate emissions are controlled by a baghouse (CE93-14-W) that exhausts to stack S93-14-W. |
| (m) Starch Bulk Loading Vacuum Cleanup System (Unit ID 93-15-W), installed February 1994. | Cleanup for cornstarch spills. Particulate emissions are controlled by bag filter dust collector (CE93-15-W) that exhausts to stack S93-15-W. |
| (n) Starch Mixing and Bulk Bagging Systems #1 and #2 (Unit IDs 93-16-W and 93-17-W), installed August 1995. | Particulate emissions are controlled by baghouses (CE93-16-W and CE93-17-W) that exhaust to stacks S93-16-W and S93-17-W. |
| (o) P.G. Starch Receiver (Unit ID 93-18-W), installed September 1999. | Particulate emissions are controlled by dust collector (CE93-18-W) that exhausts to stack S93-18-W. |
| (p) P.G. Starch Packing (Unit ID 93-39-W), installed January 2000. | Particulate emissions are controlled by a dust collector (CE93-39-W) that exhausts to stack S93-39-W. |
| (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 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-2(h)]

Pursuant to Minor Source Modification 089-12593-00203, issued September 2000, and 326 IAC 6-1-2 (Non-attainment Area Particulate Limitations), subsection (h), emissions of particulate matter less than ten (10) microns in diameter (PM10) from the following units shall be limited to the following:

| | Unit ID | PM10 Limit (gr/dscf) | PM10 Limit (lbs/hr) |
|-----|--|----------------------|---------------------|
| (a) | Channel 2 Receiver (93-32-W) | 0.005 | 0.10 |
| (b) | Channel 3 Receiver (93-33-W) | 0.005 | 0.10 |
| (c) | Channel 4 Receiver (93-34-W) | 0.005 | 0.10 |
| (d) | Channel 6 Receiver (Dextrin) (93-35-W) | 0.005 | 0.10 |
| (e) | Channel 4/6 Packing (Dextrin)(93-37-W) | 0.005 | 0.51 |
| (f) | Channel 2/3 Packing (93-36-W) | 0.005 | 0.51 |
| (g) | Central Vacuum System (93-38-W) | 0.005 | 0.02 |
| (o) | P.G. Starch Receiver (93-18-W) | 0.01 | 0.343 |
| (p) | P.G. Starch Packing (Unit ID 93-39-W) | 0.01 | 0.13 |

D.7.2 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 6-1-10.1(d)]

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements), subsection (d), emissions of particulate matter less than ten microns in diameter (PM10) from the following units shall be limited to the following:

| | Unit ID | PM10 Limit (gr/dscf) | PM10 Limit (lbs/hr) |
|-----|--|----------------------|---------------------|
| (h) | Dried Corn Syrup (Frodex) Conveying System (93-04-W) | 0.01 | 0.069 |
| (i) | Corn Syrup Solids Conveying System (93-05-W) | 0.01 | 0.066 |
| (j) | Frodex Semi-bulk Packing System (93-08-W) | 0.01 | 0.083 |
| (k) | Cornstarch Bag Dump Stations 1 & 2 (93-09-W and 93-10-W) | 0.01 each | 0.10 each |
| (l) | Starch Bulk Loading (93-14-W) | 0.01 | 0.273 |
| (m) | Starch Bulk Loading Vacuum Cleanup System (93-15-W) | 0.01 | 0.021 |
| (n) | Starch Mixing and Bulk Bagging System #1 (93-16-W) | 0.01 | 0.130 |
| (n) | Starch Mixing and Bulk Bagging System #2 (93-17-W) | 0.01 | 0.264 |

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 each Starch Warehouse Area facility control device.

Compliance Determination Requirements

D.7.4 Particulate Matter less than 10 microns in diameter (PM10)

In order to comply with D.7.1 and D.7.2, the control devices for PM10 control shall be in operation and control emissions from each facility at all times that the facility is in operation.

Compliance Monitoring Requirements

D.7.5 Visible Emissions Notations

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

D.7.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the control device used in conjunction with each Starch Warehouse Area facility as listed below, at least once per day when the associated facility is in operation. When for any one reading, the pressure drop across the baghouse or dust collector is outside any of the following ranges or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM-OAQ and HDEM and shall be calibrated at least once every six (6) months or in accordance with the manufacturer's specifications provided those specifications are available on site with the Preventive Maintenance Plan.

| | Unit ID | Control Equipment | Pressure Drop Range (inches of water) |
|-----|--|-------------------|---------------------------------------|
| (a) | Channel 2 Receiver (93-32-W) | Dust Collector | 0.1 - 6 |
| (b) | Channel 3 Receiver (93-33-W) | Dust Collector | 0.1 - 6 |
| (c) | Channel 4 Receiver (93-34-W) | Dust Collector | 0.1 - 6 |
| (d) | Channel 6 Receiver (Dextrin) (93-35-W) | Dust Collector | 0.1 - 6 |
| (e) | Channel 4/6 Packing (Dextrin) (93-37-W) | Dust Collector | 0.1 - 6 |
| (f) | Channel 2/3 Packing (93-36-W) | Dust Collector | 0.1 - 6 |
| (g) | Central Vacuum System (93-38-W) | Dust Collector | 0.1 - 6 |
| (h) | Dried Corn Syrup (Frodex) Conveying System (93-04-W) | Dust Collector | 0.1 - 6 |
| (i) | Corn Syrup Solids Conveying System (93-05-W) | Dust Collector | 0.1 - 6 |
| (j) | Frodex Semi-bulk Packing System (93-08-W) | Dust Collector | 0.1 - 6 |
| (k) | Cornstarch Bag Dump Stations 1 & 2 (93-09-W and 93-10-W) | Dust Collectors | 0.1 - 6 each |

| | | | |
|-----|---|-----------------|--------------|
| (l) | Starch Bulk Loading (93-14-W) | Dust Collector | 0.1 - 6 |
| (m) | Starch Bulk Loading Vacuum Cleanup System (93-15-W) | Dust Collector | 0.1 - 6 |
| (n) | Starch Mix and Bulk Bag Systems 1 & 2 (93-16-W and 93-17-W) | Dust Collectors | 0.1 - 6 each |
| (o) | P.G. Starch Receiver (93-18-W) | Dust Collector | 0.1 - 6 |
| (p) | P.G. Starch Packing (Unit ID 93-39-W) | Dust Collector | 0.1 - 6 |

D.7.7 Baghouse (Dust Collector) Inspections

An inspection shall be performed each calendar quarter of all bags that control particulate emissions. Inspections required by this condition shall not be performed in consecutive months. 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 is observed and it will be 10 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 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, or dust traces, 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.7.9 Record Keeping Requirements

- (a) To document compliance with Condition D.7.5, the Permittee shall maintain records of the visible emission notations of the Starch Warehouse Area Facility stack exhausts.
- (b) To document compliance with Condition D.7.6, the Permittee shall maintain daily records of the total static pressure drop readings.
- (c) To document compliance with Condition D.7.7, the Permittee shall maintain records of the results of the inspections.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: **Cargill, Inc.**
Source Address: 1100 Indianapolis Boulevard
Hammond, Indiana 46320
Mailing Address: 1100 Indianapolis Boulevard
Hammond, Indiana 46320-1094
Part 70 Permit No.: T089-7994-00203

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**

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
5925 Calumet Avenue
Hammond, Indiana 46320**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: **Cargill, Inc.**
Source Address: 1100 Indianapolis Boulevard
Hammond, Indiana 46320
Mailing Address: 1100 Indianapolis Boulevard
Hammond, Indiana 46320-1094
Part 70 Permit No.: T089-7994-00203

This form consists of 2 pages

Page 1 of 2

| |
|---|
| <p><input type="checkbox"/> 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) working 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

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| |
|---|
| 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
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

**PART 70 OPERATING PERMIT
QUARTERLY NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: **Cargill, Inc.**
Source Address: 1100 Indianapolis Boulevard
Hammond, Indiana 46320
Mailing Address: 1100 Indianapolis Boulevard
Hammond, Indiana 46320-1094
Part 70 Permit No.: T089-7994-00203

| |
|--|
| <input type="checkbox"/> Natural Gas Only |
| <input 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: |

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
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

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

Source Name: **Cargill, Inc.**
Source Address: 1100 Indianapolis Boulevard
Hammond, Indiana 46320
Mailing Address: 1100 Indianapolis Boulevard
Hammond, Indiana 46320-1094
Part 70 Permit No.: T089-7994-00203

Months: _____ **to** _____ **Year:** _____

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| | |
|---|--------------------------------------|
| <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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does 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="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p> | |
| <p><input type="checkbox"/> 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.