



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: October 17, 2006
RE: Land O'Lakes Purina Feed LLC / 085-23209-00021
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 03/23/06



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Land O' Lakes Purina Feed LLC
346 West 1350 North
Milford, Indiana 46542**

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 MSOP under 326 IAC 2-6.1.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: M 085-23209-00021	
Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: October 17, 2006 Expiration Date: October 17, 2011

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary animal feed manufacturing operation.

Authorized Individual:	EHS Leader
Source Address:	346 West 1350 North, Milford, IN 46542
Mailing Address:	P.O. Box 66812, St. Louis, MO 63166
General Source Phone Number:	574-658-4137
SIC Code:	2048
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Receiving operation and Bin Loading operation both constructed in 1972, identified as ID1 and ID2, each with a maximum capacity of 50 tons per hour of feed ingredients, and exhausting fugitively to the atmosphere.
- (b) Hammermill operation constructed in March 1994, identified as ID3, with a maximum capacity of 35 tons per hour of grain, using a cyclone as particulate control, and exhausting to stack 3.
- (c) One (1) Micro Room constructed in 1972, identified as ID4, with a maximum capacity of 0.5 tons per hour of micro ingredients, using a cyclone and baghouse as control, and exhausting to stack 3.
- (d) Grain Cleaning operation constructed in November 2001, identified as ID5, with a maximum capacity of 30 tons per hour of grain, using a filter as particulate control, and exhausting to stack 5.
- (e) Pellet Cooler operation constructed in 1972, identified as ID6, with a maximum capacity of 30 tons per hour of pelleted feed, using a cyclone as particulate control, and exhausting to stack 6.
- (f) Bulk Loadout operation constructed in 1972, identified as ID7, with a maximum capacity of 60 tons per hour of finished feed, and exhausting fugitively to the atmosphere.
- (g) Two (2) Feed Packers constructed in November 2001, identified as ID 8, with a combined total maximum capacity of 30 tons per hour of finished feed, using a baghouse as control, which discharges internally.

- (h) One (1) natural gas fired boiler constructed in 1972, identified as B1, with a maximum rated heat input of 6.3 million British thermal units per hour (MMBtu/hr), and exhausting to stack B1.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

-
- (a) This permit, M 085-23209-00021, 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 of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

B.5 Severability

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

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

B.7 Duty to Provide Information

-
- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification

-
- (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 an "authorized individual" 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. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue,
Indianapolis, 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M 085-23209-00021 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(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 ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) 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 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC13-17-3-2][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, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted 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, at reasonable times, 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, at reasonable times, 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, at reasonable times, 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.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.19 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

C.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).

C.5 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.

C.6 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
Indianapolis, Indiana 46204-2251

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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 61.145(a).

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

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.7 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
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee 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.8 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 2-6.1-5(a)(2)]

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.10 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.11 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 General Record Keeping Requirements[326 IAC 2-6.1-5]

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

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) 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
Indianapolis, Indiana 46204-2251

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C - General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Receiving operation and Bin Loading operation both constructed in 1972, identified as ID1 and ID2, each with a maximum capacity of 50 tons per hour of feed ingredients, and exhausting fugitively to the atmosphere.
- (b) Hammermill operation constructed in March 1994, identified as ID3, with a maximum capacity of 35 tons per hour of grain, using a cyclone as particulate control, and exhausting to stack 3.
- (c) One (1) Micro Room constructed in 1972, identified as ID4, with a maximum capacity of 0.5 tons per hour of micro ingredients, using a cyclone and baghouse as control, and exhausting to stack 3.
- (d) Grain Cleaning operation constructed in November 2001, identified as ID5, with a maximum capacity of 30 tons per hour of grain, using a filter as particulate control, and exhausting to stack 5.
- (e) Pellet Cooler operation constructed in 1972, identified as ID6, with a maximum capacity of 30 tons per hour of pelleted feed, using a cyclone as particulate control, and exhausting to stack 6.
- (f) Bulk Loadout operation constructed in 1972, identified as ID7, with a maximum capacity of 60 tons per hour of finished feed, and exhausting fugitively to the atmosphere.
- (g) Two (2) Feed Packers constructed in November 2001, identified as ID 8, with a combined total maximum capacity of 30 tons per hour of finished feed, using a baghouse as control, which discharges internally.
- (h) One (1) natural gas fired boiler constructed in 1972, identified as B1, with a maximum rated heat input of 6.3 million British thermal units per hour (MMBtu/hr), and exhausting to stack B1.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3-2(e), the particulate matter (PM) from the Receiving operation, Bin Loading operation, Bulk Loadout operation, and the Hammermill operation shall be limited by the following:

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

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

- (1) The particulate emissions from the Receiving operation shall not exceed 44.58 pounds per hour based on a process weight rate of 50.0 tons per hour.

- (2) The particulate emissions from the Bin Loading operation shall not exceed 44.58 pounds per hour based on a process weight rate of 50.0 tons per hour.
 - (3) The particulate emissions from the Bulk Loadout operation shall not exceed 46.29 pounds per hour based on a process weight rate of 60.0 tons per hour.
 - (4) The particulate emissions from the Hammermill operation shall not exceed 41.32 pounds per hour based on a process weight rate of 35.0 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2(e), the particulate matter (PM) from the Micro Room operation, Grain Cleaner operation, Pellet Cooler operation and the two (2) Feed Packers shall be limited by the following:

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

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

- (1) The particulate emissions from the Micro Room operation shall not exceed 2.58 pounds per hour based on a process weight rate of 0.50 tons per hour.
- (2) The particulate emissions from the Grain Cleaner operation shall not exceed 40.04 pounds per hour based on a process weight rate of 30.0 tons per hour.
- (3) The particulate emissions from the Pellet Cooler operation shall not exceed 40.04 pounds per hour based on a process weight rate of 30.0 tons per hour.
- (4) The particulate emissions from the two (2) Feed Packers shall not exceed 40.04 pounds per hour combined based on a process weight rate of 30.0 tons per hour combined.

D.1.2 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2]

Pursuant to 326 IAC 6-2-3 (Particulate Limitations for Sources of Indirect Heating) the PM emissions from the boiler shall be limited to 2.31 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where

C = 50 u/m³
Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity (6.3 MMBtu/hr)
N = number of stacks (1)
a = plume rise factor (0.67)
h = stack height (21 ft)

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.4 Particulate Matter (PM)

- (a) In order to comply with condition D.1.1, the cyclone for particulate control shall be in operation and control emissions from the Hammermill at all times that the Hammermill is in operation.
- (b) In order to comply with condition D.1.1, the cyclone for particulate control shall be in operation and control emissions from the Pellet Cooler at all times that the Pellet Cooler is in operation.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the Hammermill stack exhaust and the Pellet Cooler stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Response to Excursions or Exceedances 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 - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.6 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. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the Hammermill stack exhaust and the Pellet Cooler stack exhaust.
- (b) 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 BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Land O' Lakes Purina Feed LLC
Address:	346 West 1350 N
City:	Milford, IN 46542
Phone #:	574-658-4137
MSOP #:	085-23209-00021

I hereby certify that Land O' Lakes Purina Feed LLC is still in operation.
 no longer in operation.

I hereby certify that Land O' Lakes Purina Feed LLC is in compliance with the requirements of MSOP 085-23209-00021.
 not in compliance with the requirements of MSOP 085-23209-00021.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-6865**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____

(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	Land O' Lakes Purina Feed LLC
Source Location:	346 West 1350 North, Milford, IN 46542
County:	Kosciusko
SIC Code:	2048
Operation Permit No.:	085-14327-00021
Operation Permit Issuance Date:	September 14, 2001
Permit Renewal No.:	085-23209-00021
Permit Reviewer:	Sarah Slack

The Office of Air Quality (OAQ) has reviewed an application from Land O' Lakes Purina Feed LLC relating to the operation of a stationary animal feed manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Receiving operation and Bin Loading operation both constructed in 1972, identified as ID1 and ID2, each with a maximum capacity of 50 tons per hour of feed ingredients, and exhausting fugitively to the atmosphere.
- (b) Hammermill operation constructed in March 1994, identified as ID3, with a maximum capacity of 35 tons per hour of grain, using a cyclone as particulate control, and exhausting to stack 3.
- (c) One (1) Micro Room constructed in 1972, identified as ID4, with a maximum capacity of 0.5 tons per hour of micro ingredients, using a cyclone and baghouse as control, and exhausting to stack 3.
- (d) Grain Cleaning operation constructed in November 2001, identified as ID5, with a maximum capacity of 30 tons per hour of grain, using a filter as particulate control, and exhausting to stack 5.
- (e) Pellet Cooler operation constructed in 1972, identified as ID6, with a maximum capacity of 30 tons per hour of pelleted feed, using a cyclone as particulate control, and exhausting to stack 6.
- (f) Bulk Loadout operation constructed in 1972, identified as ID7, with a maximum capacity of 60 tons per hour of finished feed, and exhausting fugitively to the atmosphere.
- (g) Two (2) Feed Packers constructed in November 2001, identified as ID8, with a combined total maximum capacity of 30 tons per hour of finished feed, using a baghouse as control, which discharges internally.

- (h) One (1) natural gas fired boiler constructed in 1972, identified as B1, with a maximum rated heat input of 6.3 million British thermal units per hour (MMBtu/hr), and exhausting to stack B1.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) M 085-14327-00021 issued on September 14, 2001;
- (b) MPR 085-15278-00021 issued on March 5, 2002; and
- (c) MPR 085-16074-00021 issued on February 19, 2003.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

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

A complete application for the purposes of this review was received on June 12, 2006.

Emission Calculations

See Appendix A (pages 1 through 4) of this document for detailed emission calculations.

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	48.64
PM-10	19.08
SO ₂	0.02
VOC	0.15
CO	2.32
NO _x	2.76
Single HAP	Negligible
Combined HAPs	Negligible

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit of PM is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (d) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
1 hour Ozone	Attainment
8 hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds VOC and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

- (b) Kosciusko County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (c) Kosciusko County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	48.64
PM-10	19.08
SO ₂	0.02
VOC	0.15
CO	2.32
NO _x	2.76
Single HAP	-
Combination HAPs	-

“-“ signifies negligible

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

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit M 085-23209-00021, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
 - (1) 40 CFR 60.300, Subpart DD (Standards of Performance for Grain Elevators) specifically exempts animal food manufacturing operations; therefore, this New Source Performance Standard is not included in this permit.
 - (2) 40 CFR 60.40, Subpart DC (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) is applicable to steam generating units constructed after June 9, 1989 and that have a heat in-put capacity of equal to or greater than ten (10) MMBtu per hour. The boiler at this source was constructed in

1972 and has a maximum heat input capacity of six and three tenths (6.3) MMBtu per hour. Therefore, this New Source Performance Standard is not included in this permit.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.
 - (1) 40 CFR 63 Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters) is not included in this permit because this source is not a major source of HAPs.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The source which was constructed in 1972, is not subject to the requirements of 326 IAC 2-2 because the potential to emit of all criteria pollutants are less than 250 tons per year and there have been no major modifications to the source.

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

The source is not subject to the requirements of 326 IAC 2-4.1 because the potential to emit any single HAP is less than 10 tons per year and the potential to emit any combination of HAPs is less than 25 tons per year.

326 IAC 2-6 (Emission Reporting)

The source is not subject to the requirements of 326 IAC 2-6 because this source is located in Kosciusko County and is not required to have an operating permit under 326 IAC 2-7 and does not emit lead into the ambient air at levels equal to or greater than 5 tons per year.

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability – Individual Facilities

326 IAC 6-2 Particulate Emission Limitations for Sources of Indirect Heating

Pursuant to 326 IAC 6-2-3 (Particulate Limitations for Sources of Indirect Heating) the PM emissions from the boiler shall be limited to 2.31 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where

C = 50 u/m³

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (6.3 MMBtu/hr)
N = number of stacks (1)
a = plume rise factor (0.67)
h = stack height (21 ft)

The source complies with this limit without the use of a control device.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Pursuant to 326 IAC 6-3-2(e), the particulate matter (PM) from the Receiving operation, Bin Loading operation, Bulk Loadout operation, and the Hammermill operation shall be limited by the following:

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

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

- (1) The particulate emissions from the Receiving operation shall not exceed 44.58 pounds per hour based on a process weight rate of 50.0 tons per hour. The source is in compliance with this limit without the use of a control device.
- (2) The particulate emissions from the Bin Loading operation shall not exceed 44.58 pounds per hour based on a process weight rate of 50.0 tons per hour. The source is in compliance with this limit without the use of a control device.
- (3) The particulate emissions from the Bulk Loadout operation shall not exceed 46.29 pounds per hour based on a process weight rate of 60.0 tons per hour. The source is in compliance with this limit without the use of a control device.
- (4) The particulate emissions from the Hammermill operation shall not exceed 41.32 pounds per hour based on a process weight rate of 35.0 tons per hour. The cyclone shall be in operation at all times the Hammermill is in operation, in order to comply with this limit.

- (b) Pursuant to 326 IAC 6-3-2(e), the particulate matter (PM) from the Micro Room operation, Grain Cleaner operation, Pellet Cooler operation and the two (2) Feed Packers shall be limited by the following:

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

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

- (1) The particulate emissions from the Micro Room operation shall not exceed 2.58 pounds per hour based on a process weight rate of 0.50 tons per hour. The source is in compliance with this limit without the use of a control device.
- (2) The particulate emissions from the Grain Cleaner operation shall not exceed 40.04 pounds per hour based on a process weight rate of 30.0 tons per hour. The source is in compliance with this limit without the use of a control device.
- (3) The particulate emissions from the Pellet Cooler operation shall not exceed 40.04 pounds per hour based on a process weight rate of 30.0 tons per hour. The cyclone

shall be in operation at all times the Pellet Cooler is in operation, in order to comply with this limit.

- (4) The particulate emissions from the two (2) Feed Packers shall not exceed 40.04 pounds per hour combined based on a process weight rate of 30.0 tons per hour combined. The source is in compliance with this limit without the use of a control device.

326 IAC 8-1-6 (General Volatile Organic Compound Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more. This source has no facilities with potential VOC emissions equal to or greater than 25 tons per year. Therefore, this rule does not apply.

Compliance Monitoring

Permits issued under 326 IAC 2-6.1 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-6.1-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

1. The Hammemill and the Pellet Cooler have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emission notations of the Hammermill stack exhaust and the Pellet Cooler stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Response to Excursions or Exceedances 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 - Response to Excursions or Exceedances shall be considered a deviation from this permit.

- (f) 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. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Conclusion

The operation of this animal feed manufacturer shall be subject to the conditions of the Minor Source Operating Permit 085-23209-00021.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Minor Source Operating Permit (MSOP) Renewal

Source Name: Land O' Lakes Purina Feed LLC
Source Location: 346 West 1350 North, Milford, IN 46542
County: Kosciusko
SIC Code: 2048
Operation Permit No.: 085-23209-00021
Permit Reviewer: Sarah Slack

On August 8, 2006, the Office of Air Quality (OAQ) had a notice published in the Warsaw Times-Union, Warsaw, Indiana, stating that Land O' Lakes Purina Feed LLC had applied for a Minor Source Operating Permit (MSOP) renewal for an operation that manufactures animal feed. The notice also stated that OAQ proposed to issue a MSOP renewal for this operation and provided information on how the public could review the proposed MSOP renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this MSOP renewal should be issued as proposed.

Changes to the permit are noted as follows: ~~struck~~ language has been deleted; **bold** language has been added. The Table of Contents has been revised as appropriate.

OAQ Changes:

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

On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.

Although the TSD itself will not be revised as it is a historical document and the TSD was correct at the time of public notice, the following is being provided to show how the county attainment status has been affected as a result of the revocation of the one-hour ozone standard.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8 hour Ozone	Attainment
CO	Attainment
Lead	Attainment
PM-2.5	Attainment

Appendix A: Emission Calculations

Company Name: Land O' Lakes Purina Feed LLC
Address City IN Zip: 346 West 1350 N, Milford, IN 46542
CP: 085-23209-00021
Reviewer: Sarah Slack
Date: 21-Jun-06

Uncontrolled Potential Emissions (tons/year)			
Pollutant	Natural Gas Combustion	Feed Mill Process Operations	TOTAL
PM	0.05	48.59	48.64
PM10	0.21	18.87	19.08
SO2	0.02	0.00	0.02
NOx	2.76	0.00	2.76
VOC	0.15	0.00	0.15
CO	2.32	0.00	2.32
total HAPs	< 1.0	0.00	< 1.0
worst case single HAP	< 1.0	0.00	< 1.0
Total emissions based on rated capacity at 8,760 hours/year.			
Controlled Potential Emissions (tons/year)			
Pollutant	Natural Gas Combustion	Feed Mill Process Operations	TOTAL
PM	0.05	48.59	48.64
PM10	0.21	18.87	19.08
SO2	0.02	0.00	0.02
NOx	2.76	0.00	2.76
VOC	0.15	0.00	0.15
CO	2.32	0.00	2.32
total HAPs	< 1.0	0.00	< 1.0
worst case single HAP	< 1.0	0.00	< 1.0
Total emissions based on rated capacity at 8,760 hours/year, after control.			

Appendix A: Process Particulate Emissions

Company Name: Land O' Lakes Purina Feed LLC
Address City IN Zip: 346 West 1350 N, Milford, IN 46542
CP: 085-23209-00021
Reviewer: Sarah Slack
Date: 21-Jun-06

Process	Process Rate (tons per hour)	PM Emission Factor (pounds per ton)	PM-10 Emission Factor (pounds per ton)	PM Emissions (pounds per year)	PM-10 Emissions (pounds per year)	PM Emissions (tons per year)	PM-10 Emissions (tons per year)	SCC
Receiving	50.0	1.70E-02	2.50E-03	7,446.00	1,095.00	3.72	0.55	3-02-008-02
Bin Loading	50.0	1.70E-02	2.50E-03	7,446.00	1,095.00	3.72	0.55	3-02-008-02
Hammermill	35.0	0.067 ^a	0.0335 ^a	0.00	0.00	0.00	0.00	3-02-008-17
Micro Room	0.5	3.30E-03	8.00E-04	14.45	3.50	0.01	0.00	3-02-008-03
Grain Cleaner	30.0	7.50E-02	1.88E-02	19,710.00	4,927.50	9.86	2.46	3-02-005-37
Pellet Cooler	30.0	0.15 ^b	0.075 ^b	0.00	0.00	0.00	0.00	3-02-008-16
Bulk Loadout	60.0	3.30E-03	8.00E-04	1,734.48	420.48	0.87	0.21	3-02-008-03
Feed Packers	30.0	3.30E-03	8.00E-04	867.24	210.24	0.43	0.11	3-02-008-03
Total						18.61	3.88	

Emission Factors are from AP-42 Chapter 9.9.1 Grain Elevators and Grain Processing Plants.

Methodology:

PM Emissions (tons per year) = Process Rate(tons per hour)*PM Emission Factor (pounds per ton)*8760 (hours per year)/2000(pounds per ton)

PM-10 Emissions (tons per year) = Process Rate(tons per hour)*PM-10 Emission Factor (pounds per ton)*8760 (hours per year)/2000(pounds per ton)

^a The Hammermill emission factor is based on operation of the Hammermill controlled by a cyclone. See AP-42 Chapter 9.9.1.

^b The Pellet Cooler emission factor is based on operation of the Pellet Cooler controlled by a high efficiency cyclone. See AP-42 chapter 9.9.1.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR >100**

Company Name: Land O' Lakes Purina Feed LLC
Address City IN Zip: 346 West 1350 N, Milford, IN 46542
Permit Number: 085-23209-00021
Plt ID: 085-00021
Reviewer: Sarah Slack
Date: 21-Jun-06

Heat Input Capacity
MMBtu/hr

6.3

Potential Throughput
MMCF/yr

55.2

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.2	0.0	2.8	0.2	2.3

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 280 (pre-NSPS) or 190 (post-NSPS), Low NOx Burner = 140, Flue gas recirculation = 100
(See Table 1.4-1)

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-01-006-01, 1-01-006-04

(AP-42 Supplement D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 4 for HAPs emissions calculations.

Appendix A: Emission Calculations

Natural Gas Combustion Only

MMBTU/HR >100

Utility Boiler

HAPs Emissions

Company Name: Land O' Lakes Purina Feed LLC
Address City IN Zip: 346 West 1350 N, Milford, IN 46542
Permit Number: 085-23209-00021
Plt ID: 085-00021
Reviewer: Sarah Slack
Date: 21-Jun-06

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.79E-05	3.31E-05	2.07E-03	4.97E-02	9.38E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.38E-05	3.04E-05	3.86E-05	1.05E-05	5.79E-05

Methodology is the same as page 3.

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