



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: December 28, 2007
RE: Griffin Industries / 005-23269-00064
FROM: Matthew Stuckey, Deputy Branch 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, Suite N 501E, 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.dot12/03/07



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NEW SOURCE REVIEW AND FEDERALLY ENFORCEABLE STATE OPERATING PERMIT OFFICE OF AIR QUALITY

**Griffin Industries, Inc.
345 Water Street
Columbus, Indiana 47201**

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

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

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 FESOP under 326 IAC 2-8.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: 005-23269-00064	
Issued by: Original signed by Matthew Stuckey	Issuance Date: December 28, 2007
Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Expiration Date: December 28, 2012

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary animal rendering and used cooking oil processing facility.

Source Address:	345 Water Street, Columbus, Indiana 47201
Mailing Address:	P.O. Box 301, Columbus, Indiana 47201
General Source Phone Number:	(812) 379-5531
SIC Code:	2077
County Location:	Bartholomew
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

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

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

- (a) Two (2) boilers capable of burning finished yellow grease, natural gas, or No. 2 fuel oil, with a maximum heat input capacity of 25.1 MMBtu per hour each, identified as BLR-1 installed in 1989 and BLR-2 installed in 1992.

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

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

- (a) One (1) No. 2 fuel oil storage tank, constructed in 1991, with a maximum capacity of 12,796 gallons.
- (b) Storage tanks for finished yellow grease including the following:
 - (1) Two (2) storage tanks, each with a maximum capacity of 22,038 gallons (one of these tanks was constructed prior to 1991 and the other tank was constructed after 1991 and before 2001),
 - (2) One (1) storage tank constructed prior to 1991 with a maximum capacity of 26,622 gallons.
- (c) Storage tanks for raw yellow grease including the following:
 - (1) One (1) grease cabinet constructed prior to 1991 with a maximum capacity of 2,718 gallons,
 - (2) Six (6) tanks, each with a maximum capacity of 4,262 gallons (three of these tanks were constructed around 1977 and the other three were constructed

- around 1992),
- (3) One (1) tank constructed around 1992 with a maximum capacity of 5,302 gallons,
 - (4) One (1) tank constructed around 1992 with a maximum capacity of 8,226 gallons.
- (d) Storage tanks for in-process yellow grease including the following:
- (1) One (1) interphase tank constructed around 1998 with a maximum capacity of 27,073 gallons,
 - (2) Two (2) production tanks constructed around 2000, each with a maximum capacity of 12,632 gallons.

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

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

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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 Revocation of Permits [326 IAC 2-2-8]

Pursuant to 326 IAC 2-1.1-9(5) (Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4] [326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, 005-23269-00064, 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.5 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.6 Enforceability [326 IAC 2-8-6]

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.7 Severability [326 IAC 2-8-4(4)]

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.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by 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.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(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.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(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 no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the

shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.14 Emergency Provisions [326 IAC 2-8-12]

- (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 except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

- (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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) 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.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 005-23269-00064 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.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.17 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

B.18 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this

permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.19 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months 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 2-8 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.20 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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
MC 61-53 IGCN 1003
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 may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.21 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) 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 approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at 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 2-8-15(c).

- (c) Alternative Operating Scenarios Federally Enforceable State Operating Permit
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 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2326 IAC 2-8-11.1.

B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)][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, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP 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.24 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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

MC 61-53 IGCN 1003
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 administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) 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), to determine the appropriate permit fee.

B.26 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.27 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [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 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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 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.

C.5 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.

C.6 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.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
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.

Testing Requirements [326 IAC 2-8-4(3)]

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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
MC 61-53 IGCN 1003
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.10 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

C.12 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.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (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 [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [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 Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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; and/or
 - (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.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [326 IAC 2-2]

- (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.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (a) The Permittee 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or

before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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, 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.

Stratospheric Ozone Protection

C.19 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.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) Two (2) boilers capable of burning finished yellow grease, natural gas, or No. 2 fuel oil, with a maximum heat input capacity of 25.1 MMBtu per hour each, identified as BLR-1 installed in 1989 and BLR-2 installed in 1992.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Fuel Usage Limit [326 IAC 2-8]

Pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following:

- (a) The sulfur content of the finished grease used shall not exceed 0.5% by weight.
- (b) The sulfur content of the No. 2 fuel oil used shall not exceed 0.5% by weight.
- (c) The total usage of finished grease and No. 2 fuel oil shall be limited to less than 2,800,000 gallons per twelve consecutive month period with compliance determined at the end of each month. This is equivalent to SO₂ emissions of 99.4 tons per year or less from the entire source. Compliance with this limit makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1]

Pursuant to 326 IAC 7-1.1-2, the sulfur dioxide emissions from the boilers shall be limited to less than five-tenths (0.5) pound per MMBtu for distillate oil combustion. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated by a calendar month average.

D.1.3 Particulate Matter (PM) [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the boiler identified as BLR-1 shall be limited to 0.47 pounds per MMBtu heat input.
- (b) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the boiler identified as BLR-2 shall be limited to 0.39 pounds per MMBtu heat input.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the boilers.

Compliance Determination Requirements

D.1.5 Sulfur Dioxide Emissions and Sulfur Content

Compliance with Conditions D.1.1(b) and D.1.2 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 when burning No. 2 fuel oil do not exceed five-tenths (0.5) pounds per million Btu heat input by:

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

Compliance with this determination shall also show compliance with Condition D.1.1(a) pursuant to the U.S. EPA memorandum dated March 21, 2003 from the Office of Air Quality Planning and Standards to EPA Regional Air Directors.

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

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the boilers stack exhaust shall be performed once per day during normal daylight operations when burning finished grease or No. 2 fuel oil. 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. 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 2-8-4(3)] [326 IAC 2-8-16]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual finished grease and fuel oil usage since last compliance determination

period and equivalent sulfur dioxide emissions;

- (3) If the fuel supplier certification is used to demonstrate compliance when burning No. 2 fuel oil and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:
 - (A) Fuel supplier certifications;
 - (B) The name of the fuel supplier; and
 - (C) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

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

- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a daily record of visible emission notations of the boilers stack exhaust when burning finished grease or No. 2 fuel oil. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(c) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the period being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Griffin Industries, Inc.
Source Address: 345 Water Street, Columbus, Indiana 47201
Mailing Address: P.O. Box 301, Columbus, Indiana 47201
FESOP Permit No.: 005-23269-00064

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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Griffin Industries, Inc.
Source Address: 345 Water Street, Columbus, Indiana 47201
Mailing Address: P.O. Box 301, Columbus, Indiana 47201
FESOP Permit No.: 005-23269-00064

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <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 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|---|

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Griffin Industries, Inc.
 Source Address: 345 Water Street, Columbus, Indiana 47201
 Mailing Address: P.O. Box 301, Columbus, Indiana 47201
 FESOP Permit No.: 005-23269-00064
 Facility: Two (2) finished grease-fired boilers using No. 2 fuel oil or finished grease.
 Parameter: Fuel Usage
 Limit: The total usage of finished grease and No. 2 fuel oil shall be limited to less than 2,800,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Column 1			Column 2			Column 1 + Column 2		
	This Month			Previous 11 Months			12 Month Total		
	No. 2 fuel oil	Finished grease	Total	No. 2 fuel oil	Finished grease	Total	No. 2 fuel oil	Finished grease	Total
Month 1									
Month 2									
Month 3									

- No deviation occurred in this quarter.

- Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Griffin Industries, Inc.
 Source Address: 345 Water Street, Columbus, Indiana 47201
 Mailing Address: P.O. Box 301, Columbus, Indiana 47201
 FESOP Permit No.: 005-23269-00064

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

<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 ΔNo deviations occurred this reporting period@.</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
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:	
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.

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Griffin Industries, Inc.
P.O. Box 301
Columbus, Indiana 47201

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make
these representations on behalf of _____
(Company Name)

4. I hereby certify that Griffin Industries, Inc., 345 Water Street, Columbus, Indiana 47201, completed conversion of the boilers to burn finished grease on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on June 21, 2006 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. 005-23269-00064, Plant ID No. 005-23269-00064 issued on _____.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____

Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 20 _____.

My Commission expires: _____

Signature _____

Name (typed or printed)

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name: Griffin Industries, Inc.
Source Location: 345 Water Street, Columbus, Indiana 47201
County: Bartholomew
SIC Code: 2077
Operation Permit No.: F005-23269-00064
Permit Reviewer: ERG/SE

On March 5, 2007, the Office of Air Quality (OAQ) had a notice published in the Republic, Columbus, Indiana, stating that Griffin Industries, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate an animal rendering and used cooking oil processing facility. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On April 12, 2007, Griffin Industries, Inc. submitted comments on the proposed FESOP. The summary of the comments is as follows. New language is shown in bold and deleted language is shown in strikethrough. The Table of Contents has been updated as necessary.

Comment 1:

Griffin Industries, Inc. requests the requirement for a preventive maintenance plan in Condition D.1.4 for the boilers be removed. The boilers do not have any associated control devices. The preventive maintenance requirement in B.13 is written for equipment that has control devices associated with the equipment.

Response to Comment 1:

The requirements in 326 IAC 1-6-1 and 326 IAC 1-6-3 specify that the requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required to obtain a permit under 326 IAC 2-5.1 (Construction of New Sources) and 326 IAC 2-6 (Emission Reporting). This applies to facilities that have control devices as well as some types of operations (e.g., boilers) for which the OAQ has determined that preventive maintenance plans are necessary to ensure continuous compliance. No changes have been made to the permit as a result of this comment.

Comment 2:

Griffin Industries, Inc. disagrees with the requirement to sample and analyze the finished grease fuel each time the tank is filled. Griffin believes one sample per year is sufficient for confirming sulfur content of the finished grease to demonstrate compliance and to use in emission calculations for the following reasons:

1. Finished grease sulfur content from all Griffin Industries, Inc. facilities contains sulfur in a range of 7-50ppm assuming 7lb/gal density (0.0008% - 0.006%). With the addition of No. 2 diesel (at 0.5% or less sulfur) to the grease, the resultant mixture is well below 0.5% sulfur.

2. The Technical Support Document accompanying the draft permit references an EPA Memo "Assessment of Biofuels as an alternative to Conventional Fossil Fuels" dated March 21, 2003, as part of the basis for determining emission factors for finished grease. Griffin believes this memo was used as part of the rationale in determining the requirements for sampling of the finished grease. Griffin has reviewed this memo and the attachments used as the basis for the memo. The extremely conservative statements made in the memo are supported by the data in the attachments. The data also fully supports the Griffin Industries, Inc. position concerning the sulfur content of finished yellow grease and other biofuels as related to rendering (fats, lards and greases).
3. The attachments to EPA's memo show that EPA reviewed several studies on biofuels. In all of the studies, the amount of sulfur in finished grease was found to be negligible. The largest and most significant study was conducted by the University of Georgia. This study determined that the sulfur content of the finished grease used in the study was up to 0.005% (50 ppm). Stack testing using the finished grease determined an emission rate of sulfur dioxide of 0-1 ppm. The conclusions of the University of Georgia study state that biofuels have negligible amounts of sulfur.
4. Griffin Industries, Inc. was recently issued a Title V permit (V-05-025 Revision 2) for their Russellville, Kentucky facility. This facility is permitted to burn finished grease (listed as recycled cooking oil in the Russellville permit). The permit requires annual sampling of the finished grease for sulfur content. This permit was reviewed by EPA Region IV as required under Title V permit rules. No objections were received from the EPA.

Response to Comment 2:

Based on the U.S. EPA memo dated March 21, 2003, "Assessment of Biofuels as an Alternative to Conventional Fossil Fuels," (see Appendix A) the source can show compliance with the sulfur content limit for finished grease in Condition D.1.1(a) by demonstrating compliance with the limit in Condition D.1.1(b) for No. 2 fuel oil using the methods listed in Condition D.1.5. No additional testing or vendor guarantees are necessary to show compliance with the limit in Condition D.1.1(a) for finished grease. The permit has been revised as follows:

D.1.5 Sulfur Dioxide Emissions and Sulfur Content

Compliance with Conditions D.1.1**(b)** and D.1.2 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 **when burning No. 2 fuel oil** do not exceed five-tenths (0.5) pounds per million Btu heat input by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;
 - (2) Analyzing the fuel sample to determine the sulfur content of the fuel via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Fuel samples may be collected from the fuel tank immediately after the fuel tank is filled and before any fuel is combusted;
 - ~~(B) For sampling finished grease when an additional fuel is added to the finished grease, the fuel samples shall be taken after the addition of any other fuel to the finished grease and before the finished grease mixture is combusted;~~
 - ~~(C)~~**(B)** If a partially empty fuel tank is refilled, a new sample and analysis shall be performed 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.

Compliance with this determination shall also show compliance with Condition D.1.1(a) pursuant to the U.S. EPA memorandum dated March 21, 2003 from the Office of Air Quality Planning and Standards to EPA Regional Air Directors.

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.

D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through ~~(6)~~**(3)** below.
- (1) Calendar dates covered in the compliance determination period;
 - (2) Actual finished grease and fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - ~~(3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.~~
 - (3)** If the fuel supplier certification is used to demonstrate compliance when burning alternate fuels **No. 2 fuel oil** and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:
 - ~~(4)~~**(A)** Fuel supplier certifications;
 - ~~(5)~~**(B)** The name of the fuel supplier; and
 - ~~(6)~~**(C)** A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

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

- ~~(b) To document compliance with Condition D.1.5, the Permittee shall maintain records of the results of the fuel sampling and analysis for the finished grease.~~
- ~~(e)~~**(b)** To document compliance with Condition D.1.6, the Permittee shall maintain a **daily** records of visible emission notations of the boilers stack exhaust ~~once per day~~ when burning finished grease or No. 2 fuel oil. **The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).**
- ~~(d)~~**(c)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

- ~~(a) 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 six (6) month period being reported. The natural gas-fired boiler certification does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- (b) A quarterly summary of the information to document compliance with Conditions D.1.1(c) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the period being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Comment 3:

Griffin believes the methodologies listed in 326 IAC 3-7-4 and 40 CFR 60, Appendix A, Method 19 are incorrect for determining sulfur dioxide emissions and determining sulfur content of finished grease or finished grease blended with fuel oil. It is our understanding that the methodologies are applicable to petroleum fuel oils. The methods listed in 326 IAC 3-7-4 do not have the low end sensitivity to measure the de minimus amount of sulfur in the finished grease. Based on our research, Griffin believes the correct method is ASTM D5453.

Response to Comment 3:

IDEM has determined that no testing or vender guarantees are necessary in order to demonstrate compliance with the limit contained in Condition D.1.1(a) for the sulfur content of finished grease. See Response to Comment 2.

Comment 4:

Griffin Industries, Inc. believes the requirement to conduct daily observations of the boiler stacks while burning finished grease or No. 2 fuel oil in Condition D.1.6 is excessive and is not required by regulation. There is no specific rule or regulation designating normal or abnormal conditions as a violation or potential violation of any rule or standard.

Response to Comment 4:

This requirement is designed as a trigger that the source performs some corrective action on the facility if visible emissions are abnormal. By requiring corrective action be taken to restore an emission unit to normal operation, the visible emission notations are a means by which continuous compliance with the opacity limitations in 326 IAC 5-1 can be ensured, without the expense of conducting Method 9 opacity tests using a certified opacity reader. Pursuant to 326 IAC 2-8-4(3)(A), the IDEM, OAQ must include in a FESOP all monitoring necessary to establish compliance with applicable standards.

Comment 5:

Griffin Industries, Inc. does not believe the requirement to follow C.15 "Response to Excursions or Exceedances" as required by Condition D.1.6(e) would be triggered unless the facility was to exceed the opacity standard of 40% for a six minute average as stated in Condition C.3. Griffin Industries, Inc. agrees that there may be instances where it is necessary to make adjustments to the equipment to minimize emissions; however, Condition C.15 would not come into effect unless the facility exceeded the opacity stated in Condition C.3. Griffin requests this condition be restated to require following the requirements of Condition C.15 only if the opacity exceeds the levels listed in Condition C.3.

Response to Comment 5:

Condition D.1.6 requires visible emission notations be taken once each day when the boiler burns No. 2 fuel oil or finished grease. These observations do not measure the opacity of the emissions from the stack, but instead establish whether they are normal or abnormal. Method 9 opacity readings performed by a trained and certified opacity reader would be required to determine the opacity of stack emissions and to establish compliance with the opacity limits in Condition C.3. Since the observation methods in Condition D.1.6 establish only whether the visible emissions are "normal" or "abnormal" and do not

measure their opacity, Condition D.1.6(e) cannot be revised as requested by the Permittee. No changes have been made to the permit as a result of this comment.

Comment 6:

Griffin Industries, Inc. believes the requirement in Condition D.1.8(a) to submit the natural gas boiler certification is redundant and unnecessary. Griffin will be reporting on a quarterly basis the amount of finished grease and fuel oil burned at the facility. This report will state if any alternative fuels (finished grease or fuel oil) are burned. The condition D.1.8 (a) and the report form contained in the permit do not provide any additional information to IDEM, OAQ. In addition, there are no specific applicable requirements for the burning of natural gas for which this report provides any specific information towards determining compliance. If the purpose of this requirement is to document the days the boilers burn natural gas, this could be accomplished through the use of a log. Griffin proposes keeping a daily log that lists what fuel is burned. The log would be available for inspection by IDEM, OAQ.

Response to Comment 6:

Because the recordkeeping and reporting requirements included in the permit for No. 2 fuel oil and finished grease combustion are sufficient to demonstrate compliance with permit conditions, the natural gas-fired boiler certification is not necessary and has been removed from the permit.

D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through ~~(6)~~**(3)** below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual finished grease and fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - ~~(3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.~~
 - (3)** If the fuel supplier certification is used to demonstrate compliance when burning ~~alternate fuels~~ **No. 2 fuel oil** and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:
 - ~~(4)~~**(A)** Fuel supplier certifications;
 - ~~(5)~~**(B)** The name of the fuel supplier; and
 - ~~(6)~~**(C)** A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

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

...

D.1.8 Reporting Requirements

- ~~(a) 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 six (6) month period being reported. The natural gas-fired boiler certification does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- (b) A quarterly summary of the information to document compliance with Conditions D.1.1(c) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the period being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Griffin Industries, Inc.
Source Address: 345 Water Street, Columbus, Indiana 47201
Mailing Address: P.O. Box 301, Columbus, Indiana 47201
FESOP Permit No.: 005-23269-00064

<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: _____
Date: _____

~~Attach a signed certification to complete this report.~~

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

FESOP Quarterly Report

Source Name: Griffin Industries, Inc.
Source Address: 345 Water Street, Columbus, Indiana 47201
Mailing Address: P.O. Box 301, Columbus, Indiana 47201
FESOP Permit No.: 005-23269-00064
Facility: Two (2) finished grease-fired boilers using No. 2 fuel oil as a backup fuel or finished grease.
Parameter: Fuel Usage
Limit: The total usage of finished grease and No. 2 fuel oil shall be limited to less than 2,800,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Column 1			Column 2			Column 1 + Column 2		
	This Month			Previous 11 Months			12 Month Total		
	No. 2 fuel oil	Finished grease	Total	No. 2 fuel oil	Finished grease	Total	No. 2 fuel oil	Finished grease	Total
Month 1									
Month 2									
Month 3									

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

Upon further review, the OAQ has decided to make the following revisions to the permit (deleted language is shown in ~~strikeout~~ and new language is shown in **bold**).

1. IDEM, OAQ has decided to add the specific mail codes (MC) for each of the IDEM branches to improve mail delivery as follows:

Permits Branch: **MC 61-53 IGCN 1003**
 Compliance Branch: **MC 61-53 IGCN 1003**
 Asbestos Section: **MC 61-52 IGCN 1003**

2. In order to correct typographical and grammatical errors, the following changes have been made:

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), **the** potential to emit particulate matter (PM), from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

...

C.12 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 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (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.

...



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

MAR 21 2003

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

MEMORANDUM

Subject: Assessment of Biofuels as an Alternative to Conventional Fossil Fuels

From: Stephen D. Page, Director
Office of Air Quality Planning and Standards (C404-04)

To: EPA Regional Air Directors

The Vice President's Energy Plan calls for alternative fuel sources (e.g., renewables, biofuels, etc.) to supply up to 20 percent of the U.S. energy needs within 2 decades. This initiative is designed to reduce America's dependence on foreign oil imports and more importantly increase homeland security. Given the volatility in international fuel markets, industrial users have been aggressively seeking alternatives to the use of petroleum-based fossil fuels. Biofuels, such as yellow grease, lard, recycled cooking fat and other animal-derived products have been used successfully to replace petroleum-based fuels while using essentially the same power-producing equipment (e.g., boilers, engines, etc.). Additionally, these fuels have been demonstrated effective with no adverse environmental consequences.

Over the past several months, the Office of Air Quality Planning and Standards (OAQPS) has worked closely with the National Renderers Association (NRA) to gather available emissions information from the burning of selected biofuels (e.g., animal fats, reclaimed greases and oils). The focus of this data collection and analysis effort, which has involved several industry trade associations, the Fats and Protein Research Foundation and the University of Georgia, has been to assess the emissions characteristics of biofuels compared to the emissions from the burning of conventional fossil fuels (i.e., #2 and #6 fuel oils and natural gas). The information presented in this memorandum, plus the availability of the test reports that have already been completed, should provide State/Local permitting authorities with sufficient information to make permit decisions regarding the substitution of biofuels for conventional fuels without the need for costly stack testing prior to issuing a permit.

We obtained the emissions data in the form of eight emission test reports and several emission test report summaries. The data consists of 14 emission tests for the burning of yellow grease, two emission tests for the burning of lard, two emission tests for the burning of reclaimed cooking oil, four emission tests for the burning of tallow, and two emission tests for the burning of fat. One University of Georgia (UGA) boiler was tested using various biofuels, blends of

biofuels and #2 fuel oil, and conventional fuels, for a total of 173 emissions tests. We believe the available emission test data are adequate to make general statements regarding the emission characteristics of biofuels.

Based on the attached assessment, the following conclusions can be made regarding the burning of biofuels¹:

1. Biofuels may be substituted for #6 fuel oil. Compared to burning #6 fuel oil, biofuels emit less emissions of nitrogen dioxide (NO₂), sulfur dioxide (SO₂), carbon monoxide (CO), and particulate matter (PM);
2. Biofuels, with the exception of chicken fat and choice white grease, may be substituted for #2 fuel oil. Compared to burning #2 fuel oil, biofuels generally emit lower emissions of NO₂ and SO₂ and emissions of CO and PM vary between slightly higher and lower. Chicken fat and choice white grease emit significantly higher PM emissions and slightly higher NO₂ emissions compared to other biofuels that were tested;
3. Biofuels, with the exception of chicken fat and choice white grease, may be substituted for natural gas if local and regional air quality conditions warrant (i.e., consideration given for ozone, PM and CO attainment status). Compared to burning natural gas, biofuels emit slightly higher emissions of NO₂, SO₂, and PM, and comparable emissions of CO.

¹Note: Burning these fuels with and without flue gas recirculation followed the same trends as above except that in all cases, the flue gas recirculation resulted in lower NO₂ emissions.

As the nation's dependence on foreign oil continues to increase, OAQPS is striving to promote the use of alternative fuel sources - renewables, biofuels and fuel cells. In recent months, the agricultural sector has been actively seeking approval for alternatives to the use of petroleum-based fuels. Biofuels such as yellow grease, lard, recycled cooking fat, and other animal-derived fuel products provide such an environmentally safe alternative. Thus, OAQPS would like to promote the utilization of biofuels whenever possible.

In an effort to do this, I ask that Regional, State, and Local permitting authorities consider the attached memorandum, which outlines the emission characteristics for several biofuels, when evaluating future permit applications requesting the usage of biofuels as an alternative to conventional fossil fuels. As stated above, the assessment demonstrates that biofuels could effectively replace #6 fuel oil with no resultant increase in emissions. The substitution of biofuels for #2 fuel oil and natural gas may require additional analysis on a case-by-case basis, depending on a specific region's air quality concerns/needs.

Attachment

cc: Sally Shaver, Director, Emission Standards Division (ESD)
Penny Lassiter, Acting Associate Director, ESD
Bob Wayland, Leader, Combustion Group, ESD

Attachments available upon request. Contact Robert J. Wayland at 919-541-1045.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a New Source Review and Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Griffin Industries, Inc.
Source Location:	345 Water Street, Columbus, Indiana 47201
County:	Bartholomew
SIC Code:	2077
Operation Permit No.:	F005-23269-00064
Permit Reviewer:	ERG/SE

The Office of Air Quality (OAQ) has reviewed a New Source Review and FESOP application from Griffin Industries, Inc. relating to the operation of an animal rendering and used cooking oil processing source. The source also requests to start burning finished grease in their boilers.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

- (a) Two (2) natural gas-fired boilers using No. 2 fuel oil as a backup fuel, with a maximum heat input capacity of 25.1 MMBtu per hour each, identified as BLR-1 installed in 1989 and BLR-2 installed in 1992.

Note: The boilers will be permitted to convert from using natural gas to using finished grease as the primary fuel source. The boilers will be permitted to burn finished grease, natural gas, and No. 2 fuel oil. The Permittee plans to make this change in 2007.

Insignificant Activities

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

- (a) One (1) No. 2 fuel oil storage tank, constructed in 1991, with a maximum capacity of 12,796 gallons.
- (b) Storage tanks for finished yellow grease including the following:
 - (1) Two (2) storage tanks, each with a maximum capacity of 22,038 gallons (one of these tanks was constructed prior to 1991 and the other tank was constructed after 1991 and before 2001),
 - (2) One (1) storage tank constructed prior to 1991 with a maximum capacity of 26,622 gallons.
- (c) Storage tanks for raw yellow grease including the following:
 - (1) One (1) grease cabinet constructed prior to 1991 with a maximum capacity of 2,718 gallons,
 - (2) Six (6) tanks, each with a maximum capacity of 4,262 gallons (three of these tanks were constructed around 1977 and the other three were constructed around 1992),

- (3) One (1) tank constructed around 1992 with a maximum capacity of 5,302 gallons,
 - (4) One (1) tank constructed around 1992 with a maximum capacity of 8,226 gallons.
- (d) Storage tanks for in-process yellow grease including the following:
- (1) One (1) interphase tank constructed around 1998 with a maximum capacity of 27,073 gallons,
 - (2) Two (2) production tanks constructed around 2000, each with a maximum capacity of 12,632 gallons.

Existing Approvals

The source has been operating under registration 03-08-81-0084, issued on June 15, 1981.

All conditions from previous approvals were incorporated into this FESOP except the following:

Registration 03-08-81-0084 issued on June 15, 1981

Condition: Emissions shall be at a level acceptable to 326 IAC 6-2, 7-1, and 10-1.

Reason Revised: For clarification, the general statement above has been removed and specific limits pursuant to 326 IAC 6-2-4 have been included in this permit for the boilers.

326 IAC 7-1 has been repealed. 326 IAC 7-1.1 replaces this rule. Pursuant to 326 IAC 7-1.1-2, the sulfur dioxide emissions from the boilers shall be limited to less than five-tenths (0.5) pound per MMBtu for distillate oil combustion.

326 IAC 10-1 is applicable to sources in Clark or Floyd Counties. This source is in Bartholomew County; therefore, the requirements of 326 IAC 10-1 are not applicable.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the FESOP 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.

An administratively complete FESOP application for the purposes of this review was received on June 21, 2006. Additional information was received on September 14, 2006, September 26, 2006, September 28, 2006, and October 6, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 2).

Based on an EPA Memo "Assessment of Biofuels as an Alternative to Conventional Fossil Fuels" dated March 21, 2003, emissions for burning finished grease are believed to be similar to burning No. 2 fuel oil. The source has provided emission factors for burning finished grease based on stack test data from a similar source in Tennessee. These emission factors show that the emissions from burning finished grease may be less than the emissions from combustion of No. 2 fuel oil. Since the Tennessee stack tests could not be verified by IDEM, emission estimates using these stack test results are not included in Appendix A.

Potential to Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source 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	Unrestricted Potential Emissions (tons/year)
PM	3.14
PM10	5.18
SO ₂	112
VOC	2.19
CO	18.1
NO _x	31.4

HAPs	Unrestricted Potential Emissions (tons/year)
Total HAPs	0.41

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of SO₂ is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) 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.

Potential to Emit After Issuance

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."

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
Boilers	3.14	5.18	99.4 ⁽¹⁾	1.19	18.1	31.4	0.41
Storage Tanks	--	--	--	Less than 1.00	--	--	--
Total Emissions	2.80	4.62	99.4	2.19	18.1	28.0	0.41

⁽¹⁾ The sulfur content and fuel usage of No. 2 fuel oil and finished grease have been limited pursuant to 326 IAC 2-8 (FESOP).

Potential to Emit of the Revision

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

Based on an EPA Memo "Assessment of Biofuels as an Alternative to Conventional Fossil Fuels" dated March 21, 2003, emissions for burning finished grease are believed to be similar to burning No. 2 fuel oil. The source has provided emission factors for burning finished grease based on stack test data from a similar source in Tennessee. These emission factors show that the emissions from burning finished grease may be less than the emissions from combustion of No. 2 fuel oil. However, since the Tennessee stack tests could not be verified by IDEM, it is assumed that the emissions from burning finished grease will equal the emissions from burning No. 2 fuel oil. Therefore, the worst case potential to emit of the boilers remains the same after converting the boilers to burn finished grease in addition to No. 2 fuel oil and natural gas. Converting the boilers to burn finished grease does not result in an increase in the unlimited potential to emit for any pollutant. Therefore, this change is not a minor or significant source modification pursuant to 326 IAC 2-7-10.5.

County Attainment Status

The source is located in Bartholomew County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

Note: On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

- (a) Bartholomew County has been classified as unclassifiable or 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.
- (b) 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. Bartholomew County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Bartholomew County has been classified as attainment or unclassifiable in Indiana for all other 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 – Entire 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/year)
PM	3.14
PM10	5.18
SO ₂	112
VOC	2.19
CO	18.1
NO _x	31.4
Combination HAPs	0.41

This source is not a major stationary source under PSD 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.

Federal Rule Applicability

- (a) The requirements of 40 CFR 60, Subpart D (Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971) are not included in this permit for this source because the boilers each have a maximum heat input capacity less than 250 million Btu per hour.
- (b) The requirements of 40 CFR 60, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units) are not included in this permit for this source because the boilers each have a maximum heat input capacity less than 100 million Btu per hour.
- (c) The requirements of 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) are not included in this permit for this source because the boilers were each manufactured prior to the applicability date of June 9, 1989 and they have not been modified or reconstructed as defined in 40 CFR 60.2, 60.14, and 60.15.

Pursuant to 40 CFR 60.2 and 60.14, a modification is defined as any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted. Since switching to finished grease as the primary fuel for the boilers does not result in an increase in the potential to emit of any pollutant or the emission of any pollutant not previously emitted, this fuel change is not considered a modification to the boilers.

Pursuant to 40 CFR 60.15, a reconstruction of an existing facility means "...the replacement of components of an existing facility to such an extent that: (1) The fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility, and (2) It is technologically and economically feasible to meet the applicable standards set forth in this part." Since the costs associated with switching to finished grease do not result in capital costs that exceed 50 percent of the fixed capital cost of constructing a new boiler, this change does not meet the definition of "reconstruction" provided in 40 CFR 60.15(b).

- (d) The requirements of 40 CFR 60, Subpart K (Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978) are not included in this permit for this source because each storage tank has a storage capacity that is less than 40,000 gallons.

- (e) The requirements of 40 CFR 60, Subpart Ka (Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984) are not included in this permit for this source because each storage tank each has a storage capacity that is less than 40,000 gallons.
- (f) The requirements of 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984) are not included in this permit for this source because the No. 2 fuel oil, raw yellow grease, and in process yellow grease production tanks each have a storage capacity that is less than 75 cubic meters. The finished yellow grease storage tanks and the in-process interphase tank for yellow grease each store liquids with a maximum true vapor pressure less than 15.0 kPa.
- (g) The requirements of 40 CFR 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters) are not included in this permit for this source because this source is not a major source of HAPs.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source was constructed in 1989 and modified in 1992, is located in Bartholomew County, and is not in one of twenty-eight source categories. The potential to emit all regulated pollutants was less than 250 tons per year when the source was constructed in 1989 and remained less than 250 tons per year when an additional boiler was added in 1992. The source will modify the boilers in 2007, however, this change will not result in a source-wide potential to emit all pollutants that is equal to or greater than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 do not apply.

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

This source is not subject to the requirements of 326 IAC 2-4.1 because it is not a major source of HAPs.

326 IAC 2-6 (Emission Reporting)

This source is located in Bartholomew County, is not required to operate under a Part 70 permit, and has potential lead emissions less than five (5) tons per year. Therefore, pursuant to 326 IAC 2-6-1(b), the source is only subject to additional information requests as provided in 326 IAC 2-6-5.

326 IAC 2-8 (FESOP)

- (a) The sulfur content of the finished grease used shall not exceed 0.5% by weight.
- (b) The sulfur content of the No. 2 fuel oil used shall not exceed 0.5% by weight.
- (c) The total usage of finished grease and No. 2 fuel oil shall be limited to less than 2,800,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to SO₂ emissions of 99.4 tons per year or less from the entire source. Compliance with this limit makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

Based on stack tests at a similar source burning finished grease, it is predicted that burning finished grease at this source will result in a decrease in SO₂ emissions when compared to burning No. 2 fuel oil. For a worst case scenario, the limits above assume that the SO₂ emissions resulting from burning finished grease are equal to the SO₂ emissions resulting from burning No. 2 fuel oil.

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 this permit:

- (1) 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.
- (2) 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.

326 IAC 6-4 (Fugitive Dust)

Pursuant to 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.

326 IAC 6-5 (Fugitive Particulate Emission Limitations)

This source is not a source of fugitive particulate emissions; therefore, the requirements of 326 IAC 6-5 do not apply.

State Rule Applicability – Boilers

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

- (a) The boilers are subject to 326 IAC 6-2-4 because they were constructed after September 21, 1983. Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1(d)), particulate emissions from the boiler identified as BLR-1 must be calculated using the following equation:

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

Where:

P_t = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).
 Q = total source operating capacity (1 boiler with a heat input of 25.1 MMBtu/hour)

$$P_t = \frac{(1.09)}{(25.1)^{0.26}}$$

P_t = 0.47 lb/MMBtu

Pursuant to 326 IAC 6-2-4(a), the particulate emissions from BLR-1 shall not exceed 0.47 pounds per million Btu heat input.

- (b) The boiler identified as BLR-2 is subject to 326 IAC 6-2-4 because it was constructed in Bartholomew County after September 21 1983. Pursuant to 326 IAC 6-2-4, particulate emissions from BLR-2 must be calculated using the following equation:

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

Where:

P_t = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).
 Q = total source operating capacity (2 boilers, each with a heat input of 25.1 MMBtu/hour)

$$P_t = \frac{(1.09)}{(50.2)^{0.26}}$$

$$P_t = 0.39 \text{ lb/MMBtu}$$

Pursuant to 326 IAC 6-2-4(a), the particulate emissions from BLR-2 shall not exceed 0.39 pounds per million Btu heat input.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The boilers have the potential to emit sulfur dioxide greater than twenty-five (25) tons per year. Pursuant to 326 IAC 7-1.1-2, the sulfur dioxide emissions from the boilers shall be limited to less than five-tenths (0.5) pound per MMBtu for distillate oil combustion.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The boilers do not have the potential to emit twenty-five (25) tons or more per year of VOC. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

State Rule Applicability – Storage Tanks

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The storage tanks were constructed after January 1, 1980. However, they do not have potential VOC emissions of twenty-five (25) or more tons per year. Therefore, the storage tanks are not subject to the requirements of 326 IAC 8-1-6.

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

The storage tanks are not subject to the requirements of 326 IAC 8-4-3, because they each have a storage capacity less than thirty-nine thousand (39,000) gallons.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The storage tanks are not subject to the requirements of 326 IAC 8-9, because this source is not located in Clark, Floyd, Lake, or Porter Counties.

Testing Requirements

Fuel sampling is required to show compliance with the sulfur content limit of the finished grease that is combusted in the boilers. Fuel sampling shall be completed each time a fuel tank is refilled.

Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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.

1. The boilers have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the boilers exhaust shall be performed during normal daylight operations when burning finished grease or No. 2 fuel oil. A trained employee will record whether emissions are normal or abnormal. 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 start up or shut down time. 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. 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. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary because the boilers must operate properly to ensure compliance with 326 IAC 6-2-4 and 326 IAC 5.

Conclusion

The operation of this animal rendering and used cooking oil processing source shall be subject to the conditions of the FESOP No. 005-23269-00064.

**Appendix A: Emission Calculations
Emissions From Natural Gas Combustion**

Company Name: Griffin Industries, Inc.
Address: 345 Water Street
FESOP: 005-23269-00064
Reviewer: ERG/SE
Date: January 31, 2007

Total Heat Input Capacity MMBtu/hr 50.2

Potential Throughput MMscf/yr 431

Emission Factor (lbs/MMscf)	Pollutant						
	PM*	PM10*	SO ₂	NOx **	VOC	CO	HAPs
Potential to Emit (tons/yr)	0.41	1.64	0.13	21.6	1.19	18.1	0.41

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

**Emission factor for NOx (Uncontrolled) = 100 lb/MMscf.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, and 1.4-4, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (7/98).

All Emission factors are based on normal firing.

Methodology

Potential Throughput (MMscf/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMscf/1,020 MMBtu

PTE (tons/yr) = Potential Throughput (MMscf/yr) x Emission Factor (lbs/MMscf) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
Emissions From Combustion of Either Fuel Oil No. 2 or Finished Grease**

Company Name: Griffin Industries, Inc.
Address: 345 Water Street
FESOP: 005-23269-00064
Reviewer: ERG/SE
Date: January 31, 2007

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	Limited Throughput kgals/year	S = Weight % Sulfur				
50.2	3,141	2,800	0.5				
	Pollutant						
Emission Factor (lb/kgal)	PM*	PM10*	SO ₂	NO _x	VOC	CO	HAPs
	2.0	3.3	71 (142.0 S)	20.0	0.34	5.0	4.1E-02
Potential to Emit (tons/yr)	3.14	5.18	112	31.4	0.53	7.85	6.44E-02
Limited Potential to Emit (tons/yr)	2.80	4.62	99.4	28.0	0.48	7.00	5.74E-02

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Emission Factors are from AP42, Tables 1.3-1, 1.3-2, 1.3-3, and 1.3-9 (SCC 1-03-005-01/02/03) [9/98]

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

**Based on an EPA Memo "Assessment of Biofuels as an Alternative to Conventional Fossil Fuels" dated March 21, 2003, emissions for burning finished grease are believed to be similar to burning No. 2 fuel oil. The source has provided emission factors for burning finished grease based on stack test data from a similar source in Tennessee. These emission factors show that the emissions from burning finished grease may be less than the emissions from combustion of No. 2 fuel oil. Since the Tennessee stack tests could not be verified by IDEM, emission estimates using these stack test results are not included in Appendix A.

Methodology

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal/1,000 gal x 1 gal/0.140 MMBtu

Potential to Emit (tons/yr) = Potential Throughput (kgals/yr) x Emission Factor (lb/kgal)/2,000 lb/ton