DATE: November 14, 2008

TO: Interested Parties / Applicant

RE: National Starch, LLC / T097-23497-00042

FROM: Richard Wise
Administrator

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 501, Indianapolis, IN 46204, **within fifteen (15) days of the receipt of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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

Enclosures

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Office of Environmental Services
2700 Belmont Avenue
Indianapolis, IN 46221
317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw

November 14, 2008

Ms. Denise Curtis
National Starch, LLC
1515 South Drover Street
Indianapolis, IN 46221

CERTIFED MAIL: 7007 0710 0005 3957 5330

Re: 097-23497-00042 Third Significant Permit Modification to Part 70 No.: T 097-7714-00042

Dear Ms. Curtis:

National Starch and Chemical Company was issued a Part 70 Operating permit on April 14, 2004 for a wet corn milling plant located at 1515 South Drover Street, Indianapolis, Indiana which produces feed, gluten meal, germ meal, and heavy steepwater. A First Significant Permit Modification T097-20891-00042 was issued on December 8, 2006 and a Second Significant Permit Modification No. T097-24287-00042 was issued on August 23, 2007.

An application was submitted on August 11, 2006, relating to the identification of existing VOC emissions that were not previously identified from the Germ Dryer, Feed Dryer, and Gluten Dryer (emission units 5520-1A through 1C). National Starch and Chemical proposes to establish a VOC limit with new operating parameter limits, monitoring requirements, and recordkeeping requirements for the existing RTO to comply with 326 IAC 8-1-6 BACT and to make the requirements of 326 IAC 2-2 PSD not applicable. On December 19, 2007, National Starch and Chemical Company submitted a second application requesting to combine two emission points (Two (2) Loose Feed Bins and Hammer Mill) into one emission point and remove monitoring requirements. On June 5, 2008, National Starch submitted an application requesting a name change from National Starch and Chemical Company to National Starch LLC. On August XX, 2008 submitted an application to requesting to make three (3) insignificant changes to their Title V permit. The 578-1 dust collector is being returning to service. It was shutdown in 2001. The East Box operation has been removed and the dust collector 5549-16 is being relocated offsite. The West Box Packer Filter Receiver, identified as 5549-17, has now been renamed a Bulk Bag Packer Filter Receiver. Pursuant to the provisions of 326 IAC 2-7-12(d), a significant permit modification is hereby approved as described in the attached Technical Support Document.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Anh-tuan Nguyen, at (317) 327-2353 or tnguyen@indygov.org.

Sincerely,

Original Signed by

Richard Wise
Administrator

Attachments: Revised Permit and Technical Support Document
Notice of Decision

FAR/an

cc: File
Air Compliance, Matt Mosier
IDEM, Mindy Hahn
Permits, Anh-tuan Nguyen
USEPA, Region 5
Marion County Health Department

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TDD 327-5186
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PART 70 OPERATING PERMIT

Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services

National Starch, LLC
1515 South Drover Street
Indianapolis, IN 46221

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T097-7714-00042	
Original Signed by: Janet G. McCabe, Assistant Commissioner Indiana Department of Environmental Management Office of Air Quality and John B. Chavez, Administrator Indianapolis Office of Environmental Services	Issuance Date: 4/14/04 Expiration Date: 4/14/09

First Significant Permit Modification No.: 097-20891-00042 Issued: 12/8/06
Second Significant Permit Modification No.: 097-24287-00042 Issued: 8/23/07

Third Significant Permit Modification No.: 097-23497-00042	Conditions affected: Entire Permit
Issued by: Original Signed by Richard Wise Administrator Indianapolis Office of Environmental Services	Issuance Date: 11/14/08 Expiration Date: 4/14/09

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary wet corn milling plant which produces feed, gluten meal, germ meal, and heavy steepwater.

Source Address:	1515 South Drover Street, Indianapolis, IN 46221
Mailing Address:	1515 South Drover Street, Indianapolis, IN 46221
General Phone Number:	(317) 656-2325
SIC Code:	2046
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5 Standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD and Nonattainment NSR Not 1 of 28 Source Categories Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) One (1) natural gas-fired #1 Starch Flash Dryer, identified as unit 40-4, constructed in 1965 and modified in 1994, with a maximum heat input capacity of 30 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 40-4.

(b) One (1) natural gas-fired #2 Starch Flash Dryer, identified as unit 40-3, constructed in 1967 and modified in 1994 and 1999, with a maximum heat input capacity of 36 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 40-3.

(c) One (1) natural gas-fired #3 Starch Flash Dryer, identified as unit 40-2, constructed in 1971, with a maximum heat input capacity of 36 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 40-2.

(d) One (1) natural gas-fired #4 Starch Flash Dryer, identified as unit 575-1, constructed in 1977, with a maximum heat input capacity of 43 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 575-1.

(e) One (1) natural gas-fired #6 Starch Flash Dryer, identified as unit 575-3, constructed in 1993, a maximum heat input capacity of 40 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 575-3.

(f) One (1) natural gas-fired #1 Spray Dryer, identified as unit 5549-1, constructed in 1993 and modified in 1998, a maximum heat input capacity of 25 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 5549-1.

(g) One (1) natural gas-fired #2 Spray Dryer, identified as unit 5549-2, constructed in 1993 and modified in 1998, with a maximum heat input capacity of 25 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 5549-2.

(h) One (1) natural gas-fired #5 Starch Flash Dryer, identified as unit 575-2, constructed in 1979 and replaced in 1995, with a maximum heat input capacity of 38 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 575-2.

(i) One (1) natural gas-fired Feed Dryer, identified as unit 5502-1A, constructed in 1997, a maximum heat input capacity of 77 MMBtu/hr, with SO2 emissions controlled by the 1st effect wash water system, and exhausting to the inlet of unit 5502-1D.

(j) One (1) natural gas-fired Germ Dryer, identified as unit 5502-1B, constructed in 1997, a maximum heat input capacity of 20 MMBtu/hr, and exhausting to the inlet of unit 5502-1D.

(k) One (1) natural gas-fired Gluten Dryer, identified as unit 5502-1C, constructed in 1997, a maximum heat input capacity of 32 MMBtu/hr, and exhausting to the inlet of unit 5502-1D.

(l) One (1) natural gas-fired Regenerative Thermal Oxidizer, identified as unit 5502-1D, constructed in 1997, a maximum heat input capacity of 18 MMBtu/hr, used for particulate, VOC, and opacity control, and exhausting to stack 5502-7.

(m) Spray Agglomerator #3, identified as unit 5549-28, part of the spray agglomeration process, a maximum heat input capacity of 25.0 MMBtu/hr, with emissions controlled by a wet scrubber, and exhausting to stack 5549-28.

(n) One (1) DSW Bulk Bag Filler, identified as unit 71-9, with emissions controlled by an integral baghouse, and exhausting to stack 71-9.

(o) One (1) Chilsonator, identified as unit 5552-1, with emissions controlled by an integral baghouse, and exhausting to stack 5552-1.

(p) One (1) Chilsonator Hopper, identified as unit 5552-2, with emissions controlled by an integral baghouse, and exhausting to stack 5552-2.

(q) One (1) Truck Loadout, identified as unit 5503-6, constructed in 1999, with emissions controlled by a baghouse, and exhausting to stack 5502-3.

(r) One (1) Germ Bin, one (1) Pellet Bin #1, and one (1) Pellet Bin #2, identified as units 5503-2, 5503-3, and 5503-4 respectively, each constructed in 1997, with emissions controlled by a Loadout Dust Collection System, identified as 5503-5, and exhausting to stack 5503-2.

(s) One (1) DSW Packing Fugitive Dust Collector, identified as unit 71-7, constructed in 1977, with emissions controlled by a baghouse, and exhausting to stack 71-7.

(t) One (1) RSP North Packing Line, identified as unit 577-2, constructed in 1979 and modified in 2000, with emissions controlled by a baghouse, and exhausting to stack 577-2.

(u) One (1) Gluten Receiver, identified as unit 5503-1, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5503-1.

(v) One (1) Pellet Cooler and one (1) Germ Cooler, identified as units 5502-5 and 5502-6, respectively, each constructed in 1997, with emissions controlled by a high efficiency cyclone, and exhausting to stacks 5502-5 and 5502-6 respectively.

(w) Two (2) Loose Feed Bins, collectively identified as unit 5502-4, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5502-3.

(x) One (1) Hammer Mill, identified as unit 5502-3, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5502-3.

(y) One (1) DSE Bag Slitter, identified as unit 42-10, constructed in 1987, with emissions controlled by a baghouse, and exhausting to stack 42-10.

(z) One (1) P-6 Rework Station, identified as unit 54-1, constructed in 1987, with emissions controlled by a baghouse, and exhausting to stack 54-1.

(aa) One (1) RSP Hopper #4, identified as unit 577-5, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-5.

(bb) One (1) RSP Hopper #6, identified as unit 577-6, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-6.

(cc) One (1) RSP Hopper #5, identified as unit 577-7, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-7.

(dd) One (1) RSP Hopper #1, identified as unit 577-8 constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-8.

(ee) One (1) RSP Hopper #2, identified as unit 577-9, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-9.

(ff) One (1) RSP Hopper #3, identified as unit 577-10, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-10.

(gg) One (1) Industrial Packer, identified as unit 71-1, constructed in 1994, with emissions controlled by a baghouse, and exhausting to stack 71-1.

(hh) Two (2) Spray Dryer Product Receivers, identified as units 5549-3 and 5549-4, constructed in 1993, each with emissions controlled by an integral baghouse, and exhausting to stacks 5549-3 and 5549-4.

(ii) One (1) #1 Spray Dryer Storage Hopper #1, identified as unit 5549-7, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-7.

(jj) One (1) #1 Spray Dryer Storage Hopper #2, identified as unit 5549-8, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-8.

(kk) One (1) #2 Spray Dryer Storage Hopper #3, identified as unit 5549-9, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-9.

(ll) One (1) #2 Spray Dryer Storage Hopper #4, identified as unit 5549-10, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-10.

(mm) One (1) Agglomerator Feed Storage Bin, identified as unit 5549-12, constructed in 1995, with emissions controlled by an integral baghouse, and exhausting to stack 5549-12.

(nn) One (1) Agglomerator, identified as unit 5549-13, constructed in 1995, with emissions controlled by a baghouse, and exhausting to stack 5549-13.

(oo) One (1) Agglomerator Equipment Aspiration, identified as unit 5549-14, constructed in 1995, with emissions controlled by a baghouse, and exhausting to stack 5549-14.

(pp) One (1) spray agglomeration process, constructed in 2000, consisting of the following units:

(1) Bulk Bag Packer Filter Receiver, identified as unit 5549-17, with emissions controlled by an integral baghouse, and exhausting to stack 5549-17.

(2) Line 1 Middle Packer, identified as unit 5549-18, with emissions controlled by an integral baghouse, and exhausting to stack 5549-18.

(3) Line 1 North Packer, identified as unit 5549-19, with emissions controlled by an integral baghouse, and exhausting to stack 5549-19.

(4) #2 Fugitive Dust Collector, identified as emission unit 5549-20, with emissions controlled by a baghouse, and exhausting to stack 5549-20.

(5) Line 1 Packing ambient D/C, identified as unit 5549-21, with emissions controlled by baghouse, and exhausting to stack 5549-21.

(6) Line 2 Packer, identified as unit 5549-26, with emissions controlled by an integral baghouse, and exhausting to stack 5549-26.

(qq) One (1) West Corn Truck Dump, identified as unit 56-1, constructed before 1968 and modified in 1996, with emissions controlled by a baghouse, and exhausting to stack 56-1.

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

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

(a) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations: [326 IAC 2-7-1(21)(G)(xxiii)]

(1) One (1) DSE Hopper #9, identified as unit 42-3A; [326 IAC 6.5-6-25]

(2) One (1) DSE Hopper #10, identified as unit 42-3B; [326 IAC 6.5-6-25]

(3) One (1) DSE Hopper #11, identified as unit 42-3C; [326 IAC 6.5-6-25]

(4) One (1) DSE Hopper #12, identified as unit 42-3D; [326 IAC 6.5-6-25]

(5) One (1) DSE Hopper #13, identified as unit 42-3E; [326 IAC 6.5-6-25]

(6) One (1) DSE Hopper #14, identified as unit 42-3F; [326 IAC 6.5-6-25]

(7) One (1) DSE Hopper #2, identified as unit 42-7A; [326 IAC 6.5-6-25]

(8) One (1) DSE Hopper #4, identified as unit 42-7B; [326 IAC 6.5-6-25]

(9) One (1) DSE Hopper #6, identified as unit 42-7C; [326 IAC 6.5-6-25]

(10) One (1) DSE Hopper #1, identified as unit 42-8A; [326 IAC 6.5-1-2]

(11) One (1) DSE Hopper #3, identified as unit 42-8B; [326 IAC 6.5-1-2]

(12) One (1) DSE Hopper #5, identified as unit 42-8C; [326 IAC 6.5-1-2]

(13) One (1) DSE Hopper #7, identified as unit 42-8D; [326 IAC 6.5-1-2]

(14) One (1) CWS #8 Mill Receiver; identified as unit 63-1A; [326 IAC 6.5-1-2]

(15) One (1) CWS Entoleter Mill; identified as unit 63-17; [326 IAC 6.5-1-2]

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: operations M1 through M4 and RSP shop. [326 IAC 2-7-1(21)(G)(vi)(CC)][326 IAC 8-3-3]

(c) Paved and unpaved roads and parking lots with public access. [326 IAC 2-7-1(21)(G(xiii))][326 IAC 6-4]

(d) Emission units or activities with potential uncontrolled PM10 emissions of less than 5 pounds per hour or 25 pounds per day: [326 IAC 2-7-1(21)(B)]

(1) One (1) 152-1 Filter Receiver; [326 IAC 6.5-1-2]

(2) One (1) 152-2 Mixer baghouse; [326 IAC 6.5-1-2]

(3) One (1) 152-3 Starch Cooler Filter Receiver Bld 852; [326 IAC 6.5-1-2]

(4) One (1) 152-4 Starch Mixer 2 Filter/Receiver Bld 852A; [326 IAC 6.5-1-2]

(5) One (1) 152-5 Starch Mixer 2 Bld 852A; [326 IAC 6.5-1-2]

(6) One (1) 152-6 Starch Storage Hopper; [326 IAC 6.5-1-2]

(7) One (1) 128-3 Starch Hopper D/C; [326 IAC 6.5-1-2]

(8) One (1) DSW Chemical Blender Bag Slitter, identified as unit 61-15; [326 IAC 6.5-1-2]

(9) One (1) DSE Hopper #8, identified as unit 42-4; [326 IAC 6.5-6-25]

(10) One (1) Dextrin #1 System Cooler Conveyor, identified as unit 61-3; [326 IAC 6.5-1-2]

(11) One (1) Dextrin Flash Dryer, identified as unit 61-9; [326 IAC 6.5-6-25]

(12) One (1) Dextrin #3 System Cooler, identified as unit 61-22; [326 IAC 6.5-1-2]

(13) One (1) Dextrin #2 System Cooler Conveyor, identified as unit 61-23; [326 IAC 6.5-1-2]

(14) One (1) CWS South Conveying, identified as unit 63-4; [326 IAC 6.5-1-2]

(15) One (1) CWS North Conveying, identified as unit 63-5; [326 IAC 6.5-1-2]

(16) One (1) DSE North Packer, identified as unit 42-1; [326 IAC 6.5-6-25]

(17) One (1) DSE South Packer, identified as unit 42-9; [326 IAC 6.5-1-2]

(18) One (1) sodium sulfate conveying system, identified as unit 40-1; [326 IAC 6.5-1-2]

(19) One (1) DSE Negative Receiver, identified as unit 42-6; [326 IAC 6.5-6-25]

(20) One (1) DSE Railcar Loading - East Track, identified as unit 42-11; [326 IAC 6.5-1-2]

(21) One (1) DSE Railcar Loading - West Track, identified as unit 42-12; [326 IAC 6.5-1-2]

(22) One (1) Dextrin #1 System Mixer, identified as unit 61-1; [326 IAC 6.5-1-2]

(23) One (1) Dextrin #1 System Cookers, identified as unit 61-2; [326 IAC 6.5-1-2]

(24) One (1) Dextrin #2 System Mixer, identified as unit 61-6; [326 IAC 6.5-6-25]

(25) Two (2) Dextrin #2 System East and West Tanks, identified as unit 61-7; [326 IAC 6.5-1-2]

(26) One (1) Starch Storage Silo #3 Receiver, identified as unit 61-11; [326 IAC 6.5-1-2]

(27) One (1) Starch Storage Silo #1 Receiver, identified as unit 61-12; [326 IAC 6.5-1-2]

(28) One (1) Starch Storage Silo #1, identified as unit 61-13; [326 IAC 6.5-1-2]

(29) One (1) Dextrin #1 System Packer, identified as unit 61-14; [326 IAC 6.5-6-25]

(30) One (1) DSW Chemical Blender Tank; identified as unit 61-14A; [326 IAC 6.5-6-25]

(31) One (1) Dextrin System Acidifiers; identified as unit 61-16; [326 IAC 6.5-1-2]

(32) One (1) Dextrin #2 System Cooler; identified as unit 61-18; [326 IAC 6.5-1-2]

(33) One (1) Dextrin #3 System Cookers; identified as unit 61-19; [326 IAC 6.5-1-2]

(34) One (1) Starch Storage Silo #2; identified as unit 61-20; [326 IAC 6.5-1-2]

(35) One (1) Starch Storage Silo #2 Receiver; identified as unit 61-21; [326 IAC 6.5-1-2]

(36) One (1) Dextrin #3 System Mixer; identified as unit 61-24; [326 IAC 6.5-1-2]

(37) One (1) Dextrin #3 System West Tank; identified as unit 61-25; [326 IAC 6.5-1-2]

(38) One (1) Dextrin #3 System East Tank; identified as unit 61-26; [326 IAC 6.5-1-2]

(39) One (1) Grain Elevator, identified as unit 56-2; [326 IAC 6.5-6-25]

(40) One (1) CWS #7 Dryer Receiver; identified as unit 63-3; [326 IAC 6.5-1-2]

(41) One (1) CWS Packer; identified as unit 63-9; [326 IAC 6.5-1-2]

(42) One (1) Liquid Glue Bag Dump; identified as unit 63-12; [326 IAC 6.5-1-2]

(43) One (1) CWS #9 and #10 Dryers Receiver; identified as unit 63-15; [326 IAC 6.5-1-2]

(44) One (1) CWS #11, #12, and #13 Dryers; identified as unit 63-16; [326 IAC 6.5-1-2]

(45) One (1) Starch Hopper D/C, identified as unit 128-3; [326 IAC 6.5-1-2]

(46) One (1) CWS South Raw Material Dump; identified as unit 63-18; [326 IAC 6.5-1-2]

(47) One (1) DSW Negative Receiver; identified as unit 63-20; [326 IAC 6.5-1-2]

(48) Two (2) DSW Hoppers #17 and #18; identified as unit 71-2; [326 IAC 6.5-6-25]

(49) One (1) Dextrin Packer; identified as unit 71-3; [326 IAC 6.5-1-2]

(50) One (1) DSW Hopper #13, identified as unit 71-4A; [326 IAC 6.5-6-25]

(51) One (1) DSW Hopper #1; identified as unit 71-5A; [326 IAC 6.5-6-25]

(52) One (1) DSW Hopper #2; identified as unit 71-5B; [326 IAC 6.5-6-25]

(53) One (1) DSW Hopper #3; identified as unit 71-5C; [326 IAC 6.5-6-25]

(54) One (1) DSW Hopper #4; identified as unit 71-5D; [326 IAC 6.5-6-25]

(55) One (1) DSW Hopper #5; identified as unit 71-5E; [326 IAC 6.5-6-25]

(56) One (1) DSW Hopper #6; identified as unit 71-5F; [326 IAC 6.5-6-25]

(57) One (1) DSW Hopper #7; identified as unit 71-5G; [326 IAC 6.5-6-25]

(58) One (1) DSW Hopper #8; identified as unit 71-5H; [326 IAC 6.5-6-25]

(59) One (1) DSW Hopper #9; identified as unit 71-5I; [326 IAC 6.5-6-25]

(60) One (1) DSW Hopper #10; identified as unit 71-5J; [326 IAC 6.5-6-25]

(61) One (1) DSW Hopper #11; identified as unit 71-5K; [326 IAC 6.5-6-25]

(62) One (1) DSW Hopper #12; identified as unit 71-5L; [326 IAC 6.5-6-25]

(63) One (1) DSW Bulk Car Loading; identified as unit 71-8; [326 IAC 6.5-1-2]

(64) One (1) RSP Bulk Bag Packing; identified as unit 577-1; [326 IAC 6.5-1-2]

(65) One (1) RSP Bulk Loading System A; identified as unit 577-4; [326 IAC 6.5-1-2]

(66) One (1) RSP Bulk Loading Fugitive Dust Collector; identified as unit 577-4A; [326 IAC 6.5-1-2]

(67) One (1) CWS Packing Hopper; identified as unit 578-2; [326 IAC 6.5-1-2]

(68) One (1) CWS Milling System, identified as unit 578-3; [326 IAC 6.5-1-2]

(69) One (1) CATO Cooling and Conveying, identified as unit 581-2; [326 IAC 6.5-1-2]

(70) One (1) RSP South Packing Line, identified as unit 577-3; [326 IAC 6.5-1-2]

(71) One (1) Starch Filter/Receiver 2 Bld 852, identified as unit 152-7; [326 IAC 6.5-1-2]

(72) One (1) Starch Mixer 4 Bld 852A Filter Receiver, identified as unit 152-8; [326 IAC 6.5-1-2]

(73) One (1) Starch Mixer 4 Bld 852A, identified as unit 152-9; [326 IAC 6.5-1-2]

(74) One (1) Starch Mixer 3 Bld 852A Filter Receiver, identified as unit 152-10; [326 IAC 6.5-1-2]

(75) One (1) Starch Mixer 3 Bld 852A, identified as unit 152-11; [326 IAC 6.5-1-2]

(76) One (1) FG Bulk Bag Bin Vent Bld 800, identified as unit FA-60582; [326 IAC 6.5-1-2]

(77) One (1) Blending Bin identified as unit TF31901 venting through product recovery DC-31901, Bld 630, venting out stack 1; [326 IAC 6.5-1-2]

(78) One (1) Base Bin identified as unit TF31902 venting through product recovery DC-31902, Bld 630, venting out stack 2; [326 IAC 6.5-1-2]

(79) One (1) Product Bin identified as unit TF31991 venting through product recovery DC-31991, Bld 630, venting out stack 3; [326 IAC 6.5-1-2]

(80) One (1) Surge Tank Bin identified as unit SH31913 venting through product recovery DC-31911, Bld 630, venting out stack 7; [326 IAC 6.5-1-2]

(81) One (1) Bulk Bag Unload Bin with integral dust collector , identified as unit DC-31900, Bld 630, venting out stack 8; [326 IAC 6.5-1-2]

(82) One (1) FBR exhaust through product recovery metal filters, Bld 630, identified as unit TR31912 venting out stack 5; [326 IAC 6.5-1-2]

(83) One (1) starch dryer identified as unit T-1, constructed in 2005, with a maximum production rate of 300 lbs/hr, with emissions controlled by integral product collector/cyclone and duct collector and exhausting through T-1 stack; [326 IAC 6.5-1-2]

(84) One (1) Line 1 South Packing Hopper, identified as unit 5549-22, constructed in 2006, with emissions controlled by integral product collector and exhausting through stack 5549-22. [326 IAC 6.5-1-2]

(85) One (1) CSW conveying cyclone operation, identified as unit 578-1, constructed in 2008, with emissions controlled by a baghouse and exhausting through stack 578-1. [326 IAC 6.5-1-2]

(e) Combustion related activities including spaces heaters, process heaters, or boilers using natural gas-fired with heat input equal to or less than ten million (10,000,000) British thermal units per hour;[326 IAC 2-7-1(21)(G)(i)(AA)(aa)]

(1) One (1) process heater, Bld 630, natural gas fired, with maximum heat input capacity of 5.1 MMBtu/hr, identified as unit YX31914A, venting out stack 6.

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, TV 097-7714-00042, 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 and OES, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

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

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ and OES, within a reasonable time, any information that IDEM, OAQ and OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ and OES copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) the "responsible official" is defined at 326 IAC 2-7-1(34).

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

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15th 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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

and

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ and OES may require to determine the compliance status of the source.

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

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

(b) A copy of the PMPs shall be submitted to IDEM, OAQ and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and OES. IDEM, OAQ and OES 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation .

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and OES 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
Office of Environmental Services phone: (317) 327-2234; fax: (317) 327-2274

(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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) 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 and OES may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ and OES by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, or OESshall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or OES has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or OES has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T097-7714-00042 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

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

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

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

(1) That this permit contains a material mistake.

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

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, or OES to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, or OES at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or OES may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and OES and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

(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, and OESon 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 2-7 until IDEM, OAQ and OES 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 and OES any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

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

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

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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

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

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the 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

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

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 2-7-20(b),(c), or (e). 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 and OES in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

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

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) 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.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2] [326 IAC 2-3-2]

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

(b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and 326 IAC 2-3-2.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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, and OES or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

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

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

(a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 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.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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 2-7-5(1)]

C.1 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.5 Stack Height [326 IAC 1-7]

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

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

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

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

C.7 Performance Testing [326 IAC 3-6]

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

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

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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and OES if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

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

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

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

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 2-7-5][326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval 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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

within ninety (90) days after the date of issuance of this permit.

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

(c) If the ERP is disapproved by IDEM, OAQ and OES, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ and OES that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

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

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

C.17 General Record Keeping Requirements[326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES 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) If there is a "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, other than projects at a source with a Plant-wide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or IAC 2-3-1 (mm)), the Permittee shall comply with the following:

(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
  - (i) Baseline actual emissions;
  - (ii) Projected actual emissions;
  - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and 326 IAC 2-3-1(mm)(2)(A)(iii); and
  - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) 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.

Reports required in this part shall be submitted to:

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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

(f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-2-1 (qq) and 326 IAC 2-3-1(ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ and OES:

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx) and 326 IAC 2-3-1(qq), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).

(g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

and

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221

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

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 2-7-5(15)]:

(a) One (1) natural gas-fired #1 Starch Flash Dryer, identified as unit 40-4, constructed in 1965 and modified in 1994, with a maximum heat input capacity of 30 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 40-4.

(b) One (1) natural gas-fired #2 Starch Flash Dryer, identified as unit 40-3, constructed in 1967 and modified in 1994 and 1999, with a maximum heat input capacity of 36 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 40-3.

(c) One (1) natural gas-fired #3 Starch Flash Dryer, identified as unit 40-2, constructed in 1971, with a maximum heat input capacity of 36 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 40-2.

(d) One (1) natural gas-fired #4 Starch Flash Dryer, identified as unit 575-1, constructed in 1977, with a maximum heat input capacity of 43 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 575-1.

(e) One (1) natural gas-fired #6 Starch Flash Dryer, identified as unit 575-3, constructed in 1993, a maximum heat input capacity of 40 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 575-3.

(f) One (1) natural gas-fired #1 Spray Dryer, identified as unit 5549-1, constructed in 1993 and modified in 1998, a maximum heat input capacity of 25 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 5549-1.

(g) One (1) natural gas-fired #2 Spray Dryer, identified as unit 5549-2, constructed in 1993 and modified in 1998, with a maximum heat input capacity of 25 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 5549-2.

(h) One (1) natural gas-fired #5 Starch Flash Dryer, identified as unit 575-2, constructed in 1979 and replaced in 1995, with a maximum heat input capacity of 38 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 575-2.

(i) One (1) natural gas-fired Feed Dryer, identified as unit 5502-1A, constructed in 1997, a maximum heat input capacity of 77 MMBtu/hr, with SO2 emissions controlled by the 1st effect wash water system, and exhausting to the inlet of unit 5502-1D.

(j) One (1) natural gas-fired Germ Dryer, identified as unit 5502-1B, constructed in 1997, a maximum heat input capacity of 20 MMBtu/hr, and exhausting to the inlet of unit 5502-1D.

(k) One (1) natural gas-fired Gluten Dryer, identified as unit 5502-1C, constructed in 1997, a maximum heat input capacity of 32 MMBtu/hr, and exhausting to the inlet of unit 5502-1D.

(l) One (1) natural gas-fired Regenerative Thermal Oxidizer, identified as unit 5502-1D, constructed in 1997, a maximum heat input capacity of 18 MMBtu/hr, used for particulate, VOC, and opacity control, and exhausting to stack 5502-7.

(m) Spray Agglomerator #3, identified as unit 5549-28, part of the agglomerator process listed in Section D.2, a maximum capacity of 25.0 MMBtu/hr with emissions controlled by a wet scrubber, and exhausting to stack 5549-28.

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

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

D.1.1 Prevention of Significant Deterioration [326 IAC 2-2]

(a) Pursuant to CP 097-00042-97-01, issued March 24, 1997, A 097-00042-98-01, issued April 15, 1998, and in order to render the requirements of 326 IAC 2-2 not applicable:

(1) The combined input of corn grind to units 5502-1A, 5502-1B, 5502-1C, 5502-3 (Section D.2), 5502-4 (Section D.2), 5502-5 (Section D.2), 5502-6 (Section D.2), 5502-7 (Section D.2), 5503-1 (Section D.2), 5503-2 (Section D.2), 5503-3 (Section D.2), 5503-4 (Section D.2), 5503-5 (Section D.2) and 5503-6 (Section D.2) shall not exceed 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit and the limits set in D.1.1(c) and D.2.1(a) limits PM/PM10 emissions to less than or equal to 43.862 tons per year and will render the requirements of 326 IAC 2-2 not applicable.

(2) The combined input of starch for units 5549-1 and 5549-2 shall not exceed 22,500 tons per twelve consecutive month period with compliance determined at the end of each month and the total emission rate shall not exceed 2.50 lb PM/PM10 per ton of starch. Compliance with this limit will limit PM/PM10 emissions to less than or equal to 28.11 tons per year and will render the requirements of 326 IAC 2-2 not applicable.

(3) The SO_2 emissions from units 5502-1A, 5502-1B, 5502-1C, and 5502-1D, shall not exceed a total of 8.05 pounds per hour. Compliance with this limit will limit SO_2 emissions to less than or equal to 35.26 tons per year and will render the requirements of 326 IAC 2-2 not applicable.

(4) The combined input of natural gas to 5502-1A, 5502-1B, 5502-1C, and 5502-1D shall not exceed 1,851 million cubic feet (MMcf) per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit will limit NO_x emissions to less than or equal to 39 tons per year and will render the requirements of 326 IAC 2-2 not applicable.

(b) Pursuant to CP 097-00042-97-01, issued March 24, 1997, SSM 097-11362-00042, issued August 31, 1996, and in order to render the requirements of 326 IAC 2-2 not applicable, the following facilities are limited as indicated in the table below:

Unit/ Stack ID	PM/PM10 Limit (gr/dscf)	PM/PM10 Limit (lb/hr)	PM/PM10 Limit (ton/yr)
575-3	0.012	5.63	24.65
5549-1	0.02	--	--
5549-2	0.02	--	--
5549-28	0.025	9.64	42.24

(c) Pursuant to M 097-00042-99-01, issued February 25, 1999, the total PM/PM10 emissions from stack 5502-7 (exhausting emissions from units 5502-1A through 5502-1D) shall not exceed 0.0114 gr/dscf, 4.53 lb/hr, and 19.856 tons per year. Compliance with this limit will render the requirements of 326 IAC 2-2 not applicable.

(d) Pursuant to CP 097-00042-99-01, issued June 11, 1999, the starch produced from unit 40-3 shall not exceed 145,610 tons per twelve consecutive month period with compliance

determined at the end of each month and the emission rate shall not exceed 0.581 lb PM/PM10 per ton of starch produced. Compliance with this limit will limit PM/PM10 emissions to less than or equal to 42.3 tons per year, will satisfy the requirements of 326 IAC 6.5-6-25, and render the requirements of 326 IAC 2-2 not applicable.

(e) The combined VOC emissions from units 5502-1A, 5502-1B, 5502-1C, and 5502-1D, shall not exceed a total of 4.89 pounds per hour. Compliance with this limit will limit VOC emissions to less than or equal to 21.4 tons of per year and will render the requirements of 326 IAC 2-2 not applicable to the Germ Dryer, Feed Dryer, and Gluten Dryer.

D.1.2 Particulate Matter [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, the particulate matter emissions from 575-3, 5549-1, 5549-2, 5502-1A, 5502-1B, 5502-1C, 5502-1D, and 5549-28 shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

Compliance with the respective particulate matter emission limits in Condition D.1.1 for 575-3, 5549-1, 5549-2, 5502-1A, 5502-1B, 5502-1C, 5502-1D, and 5549-28, will ensure compliance with the requirements of 326 IAC 6.5-1-2.

D.1.3 Particulate Matter [326 IAC 6.5-6-25]

(a) Facilities 40-4, 40-3, 40-2, 575-1, and 575-2 are limited as indicated in the table below:

Facility	PM Limit (gr/dscf)	PM Limit (ton/yr)
40-4	0.02	44.1
40-3	0.016	42.3
40-2	0.016	31.9
575-1	0.011	32.4
575-2	0.011	32.4

Compliance with these limits will satisfy the requirements of 326 IAC 6.5-6-25.

(b) Pursuant to CP 097-00042-95-02, issued March 8, 1995, the amount of dry product processed by unit 575-2 shall not exceed 123,300 tons per twelve month consecutive period with compliance determined at the end of each month. Compliance with this limit will satisfy the requirements of 326 IAC 6.5-6-25.

D.1.4 Volatile Organic Compounds [326 IAC 8-1-6]

(a) Pursuant to CP 097-00042-95-03, issued October 6, 1995, the amount of methanol emitting corn starch produced from unit 575-2 shall not exceed 11,995,200 pounds per twelve consecutive month period with compliance determined at the end of each month and the emission rate shall not exceed 0.0041 lb VOC per lb of starch. Compliance with this limit is equivalent to VOC emission of less than 25 tons per year and will render the requirements of 326 IAC 8-1-6 not applicable.

(b) Pursuant to 326 IAC 8-1-6, the Permittee shall employ Best Available Control Technology (BACT) for emission units 5502-1A, 5502-1B, 5502-1C which has been determined to be:

(1) The VOC emissions from the Germ Dryer, Feed Dryer, and Gluten Dryer, identified as 5502-1A, 5502-1B, and 5502-1C, shall be controlled by a regenerative thermal oxidizer or an equivalent thermal oxidation unit.

(2) The overall VOC efficiency for the regenerative thermal oxidizer, or an equivalent thermal oxidation unit, (including capture efficiency and destruction efficiency)

shall be at least 95%.

(3) The VOC emissions from the Germ Dryer, Feed Dryer, and Gluten Dryer, identified as 5502-1A, 5502-1B, and 5502-1C, combined shall not exceed 4.89 pounds per hour (lbs/hr).

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.6 Particulate, Sulfur Dioxide and VOC Control

(a) In order to comply with Conditions D.1.1, D.1.2 and D.1.4, the RTO, or an equivalent thermal oxidation unit, shall be in operation and control particulate and VOC emissions from units 5502-1A, 5502-1B, and 5502-1C at all times when any of those units are in operation.

(b) In order to comply with Condition D.1.1(a)(3), the 1st effect wash water system shall be in operation and control SO2 emissions from unit 5502-1A at all times the unit is in operation.

(c) In order to comply with Conditions D.1.1, D.1.2, and D.1.3, the scrubbers shall be in operation and control particulate emissions from units 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1, 5549-2, 575-2, and 5549-28 at all times those units are in operation.

D.1.7 Testing Requirements [326 IAC 2-1.1-11]

(a) No later than five (5) years from January 11, 2006, in order to demonstrate compliance with Condition D.1.1 and D.1.4, the Permittee shall perform SO_2 and VOC testing on emission unit 5502-1A, 5502-1B, 5502-1C and 5502-1D, utilizing methods as approved by the Commissioner. Testing shall be repeated every five (5) years and shall be conducted in accordance with Section C - Performance Testing.

(b) Within 180 days after installation of an equivalent thermal oxidation unit, in order to demonstrate compliance with Condition D.1.1(e) and D.1.4(b), the Permittee shall perform VOC testing on emission unit 5502-1A, 5502-1B, 5502-1C, utilizing methods approved by the Commissioner. Testing shall be repeated every five (5) years and shall be conducted in accordance with Section C - Performance Testing.

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

D.1.8 Visible Emission Notations

(a) Visible emission notations of exhaust from stacks 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1, 5549-2, 575-2, 5502-7, and 5549-28 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. A notation of abnormal visible emissions is not a deviation from this permit.

(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.

(f) Visible emission notations of exhaust from stack 5502-7 are not required during scheduled, routine bakeout events involving the natural gas-fired Regenerative Thermal Oxidizer (RTO), or equivalent thermal oxidation unit, used for particulate and opacity control, provided that the Permittee meets the following conditions:

(1) The Permittee notifies the OAQ and OES at least twenty-four (24) hours in advance of a bakeout event;

(2) The Permittee follows specific bakeout procedures outlined in the Preventive Maintenance Plan (PMP), thereby minimizing emissions during the backout event. Deviations from the procedures in the PMP during bakeout events will require that changes are made to the PMP;

(3) The Permittee completes bakeout events in an expeditious manner;

(4) The Permittee documents that bakeout event do not exceed three percent (3%) of the annual operating time of the RTO, or equivalent device; and

(5) The Permittee keeps records of the date and duration of each bakeout event.

Provided that these conditions are met, the Permittee is allowed a temporary alternative opacity limitation during bakeout events such that opacity shall not exceed sixty percent (60%) for more than a cumulative total of 14 hours in any twenty-four (24) period.

D.1.9 Parametric Monitoring for Scrubbers, RTO and 1st Effect Wash Water System

(a) The Permittee shall monitor the pH and flow rate of the liquid through the nozzles of the 1st effect wash water to the GHE at least once per week of the system used to control SO2 emissions from unit 5502-1A. When for any one reading the pH of the liquid used in the 1st effect wash water is less than 6.5, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pH or flow rate reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

(b) The Permittee shall monitor the exhaust air stream pressure drop across each scrubber, and each scrubber make-up rate at least once per week from the scrubbers controlling emissions from units 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1, 5549-2, and 575-2. When, for any one reading, the pressure drop across the scrubber is outside the range in the table listed below, or a range established during the last stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. When, for any one reading, the make-up rate is less than the manufacturer's specifications, or a rate established during the most recent stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure drop or make-up rate reading that is outside ranges listed in the table below is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Unit #	Unit Name	Year installed or upgraded	Pressure Drop Range
40-4	#1 SFD Scrubber	1986	3” to 8”
40-3	#2 SFD Scrubber	1999	6” to 15”
40-2	#3 SFD Scrubber	1986	3” to 8”
575-1	#4 SFD Scrubber	1978 modified in plant	6” to 15”
575-2	#5 SFD Scrubber	1995	6” to 15”
575-3	#6 SFD Scrubber	1992	6” to 15”
5549-1	#1 SD Scrubber	1999	6” to 15”
5549-2	#2 SD Scrubber	1999	6” to 15”

(c) The Permittee shall monitor the pressure drop across the scrubber at least once daily from the scrubber controlling emissions from unit 5549-28 when 5549-28 is in operation. When, for any one reading, the pressure drop across the scrubber is outside the normal range of 6.0 to 15.0 inches of water, or a range that indicates proper operation of the unit, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(d) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer, or an equivalent thermal oxidation unit, for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until any approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average temperature of the thermal oxidizer, or an equivalent thermal oxidation unit, is below 1450°F. A three (3) hour average temperature that is below 1450°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit. Approved stack test results may reset the three (3) hour average temperature of the thermal oxidizer, or an equivalent thermal oxidation unit, to an alternative temperature and be incorporated via minor modification procedures.

(e) The instruments used for determining the pH, pressure drop, flow rate and temperature shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated, maintained, and operated according to the Preventive Maintenance Plan.

D.1.10 Scrubber Malfunction

In the event that a scrubber malfunction has been observed, the affected unit will be shut down immediately in accordance with safe operating procedures until the failed unit has been repaired or the appropriate components replaced.

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

D.1.11 Record Keeping Requirements

(a) To document compliance with Condition D.1.1(a)(1) and D.1.4(b)(3), the Permittee shall maintain monthly records of the combined input of corn grind for the units identified in Condition D.1.1(a)(1).

(b) To document compliance with Conditions D.1.1(a)(2), the Permittee shall maintain monthly records of the combined input of starch for units 5549-1 and 5549-2.

(c) To document compliance with Condition D.1.1(a)(4), the Permittee shall maintain monthly records of the total input of natural gas consumed by 5502-1A, 5502-1B, 5502-1C, and 5502-1D.

(d) To document compliance with Condition D.1.1(d), the Permittee shall maintain monthly records of the amount of starch produced by unit 40-3.

(e) To document compliance with Condition D.1.3(b), the Permittee shall maintain monthly records of the amount of dry product processed by unit 575-2.

(f) To document compliance with Condition D.1.4, the Permittee shall maintain monthly records of the amount of methanol emitting corn starch produced and VOC-containing reagent from unit 575-2.

(g) To document compliance with Condition D.1.8, the Permittee shall maintain a daily record of visible emission notations of the stack exhausts. 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).

(h) To document compliance with Conditions D.1.1(a)(3) and D.1.9(a), the Permittee shall maintain weekly records of the pH and flow rate of the 1st effect wash water during normal operations.

(i) To document compliance with Condition D.1.9(b), the Permittee shall maintain weekly records of the pressure drop across the scrubber and scrubber make-up rate during normal operation.

(j) To document compliance with Condition D.1.9(c), the Permittee shall maintain a daily record of the pressure drop across scrubber used in conjunction with facility 5549-28. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(k) To document compliance with Condition D.1.9(d), the Permittee shall maintain continuous records (on a 3-hour average basis) for the RTO (unit 5502-1D), or an equivalent thermal oxidation unit, combustion chamber temperature during normal operations.

(l) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

Quarterly summaries of the information to document compliance with Conditions D.1.1, D.1.3 and D.1.4 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The reports submitted by the Permittee do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(n) One (1) DSW Bulk Bag Filler, identified as unit 71-9, with emissions controlled by an integral baghouse, and exhausting to stack 71-9.

(o) One (1) Chilsonator, identified as unit 5552-1, with emissions controlled by an integral baghouse, and exhausting to stack 5552-1.

(p) One (1) Chilsonator Hopper, identified as unit 5552-2, with emissions controlled by an integral baghouse, and exhausting to stack 5552-2.

(q) One (1) Truck Loadout, identified as unit 5503-6, constructed in 1999, with emissions controlled by a baghouse, and exhausting to stack 5502-3.

(r) One (1) Germ Bin, one (1) Pellet Bin #1, and one (1) Pellet Bin #2, identified as units 5503-2, 5503-3, and 5503-4 respectively, each constructed in 1997, with emissions controlled by a Loadout Dust Collection System, identified as 5503-5, and exhausting to stack 5503-2.

(s) One (1) DSW Packing Fugitive Dust Collector, identified as unit 71-7, constructed in 1977, with emissions controlled by a baghouse, and exhausting to stack 71-7.

(t) One (1) RSP North Packing Line, identified as unit 577-2, constructed in 1979 and modified in 2000, with emissions controlled by a baghouse, and exhausting to stack 577-2.

(u) One (1) Gluten Receiver, identified as unit 5503-1, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5503-1.

(v) One (1) Pellet Cooler and one (1) Germ Cooler, identified as units 5502-5 and 5502-6, respectively, each constructed in 1997, with emissions controlled by a high efficiency cyclone, and exhausting to stacks 5502-5 and 5502-6 respectively.

(w) Two (2) Loose Feed Bins, collectively identified as unit 5502-4, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5502-3.

(x) One (1) Hammer Mill, identified as unit 5502-3, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5502-3.

(y) One (1) DSE Bag Slitter, identified as unit 42-10, constructed in 1987, with emissions controlled by a baghouse, and exhausting to stack 42-10.

(z) One (1) P-6 Rework Station, identified as unit 54-1, constructed in 1987, with emissions controlled by a baghouse, and exhausting to stack 54-1.

(aa) One (1) RSP Hopper #4, identified as unit 577-5, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-5.

(bb) One (1) RSP Hopper #6, identified as unit 577-6, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-6.

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

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

(cc) One (1) RSP Hopper #5, identified as unit 577-7, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-7.

(dd) One (1) RSP Hopper #1, identified as unit 577-8 constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-8.

(ee) One (1) RSP Hopper #2, identified as unit 577-9, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-9.

(ff) One (1) RSP Hopper #3, identified as unit 577-10, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-10.

(gg) One (1) Industrial Packer, identified as unit 71-1, constructed in 1994, with emissions controlled by a baghouse, and exhausting to stack 71-1.

(hh) Two (2) Spray Dryer Product Receivers, identified as units 5549-3 and 5549-4, constructed in 1993, each with emissions controlled by an integral baghouse, and exhausting to stacks 5549-3 and 5549-4.

(ii) One (1) #1 Spray Dryer Storage Hopper #1, identified as unit 5549-7, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-7.

(jj) One (1) #1 Spray Dryer Storage Hopper #2, identified as unit 5549-8, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-8.

(kk) One (1) #2 Spray Dryer Storage Hopper #3, identified as unit 5549-9, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-9.

(ll) One (1) #2 Spray Dryer Storage Hopper #4, identified as unit 5549-10, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-10.

(mm) One (1) Agglomerator Feed Storage Bin, identified as unit 5549-12, constructed in 1995, with emissions controlled by an integral baghouse, and exhausting to stack 5549-12.

(nn) One (1) Agglomerator, identified as unit 5549-13, constructed in 1995, with emissions controlled by a baghouse, and exhausting to stack 5549-13.

(oo) One (1) Agglomerator Equipment Aspiration, identified as unit 5549-14, constructed in 1995, with emissions controlled by a baghouse, and exhausting to stack 5549-14.

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

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

(pp) One (1) spray agglomeration process, constructed in 2000, consisting of the following units:

(1) Bulk Bag Packer Filter Receiver, identified as unit 5549-17, with emissions controlled by an integral baghouse, and exhausting to stack 5549-17.

(2) Line 1 Middle Packer, identified as unit 5549-18, with emissions controlled by an integral baghouse, and exhausting to stack 5549-18.

(3) Line 1 North Packer, identified as unit 5549-19, with emissions controlled by an integral baghouse, and exhausting to stack 5549-19.

(4) #2 Fugitive Dust Collector, identified as emission unit 5549-20, with emissions controlled by a baghouse, and exhausting to stack 5549-20.

(5) Line 1 Packing ambient D/C, identified as unit 5549-21, with emissions controlled by baghouse, and exhausting to stack 5549-21.

(6) Line 2 Packer, identified as unit 5549-26, with emissions controlled by an integral baghouse, and exhausting to stack 5549-26.

(qq) One (1) West Corn Truck Dump, identified as unit 56-1, constructed before 1968 and modified in 1996, with emissions controlled by a baghouse, and exhausting to stack 56-1.

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

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

D.2.1 Prevention of Significant Deterioration: PM and PM10 Limitations [326 IAC 2-2]

(a) Pursuant to CP 097-0042-97-01, issued March 24, 1997, M 097-00042-99-01, issued February 25, 1999, MSM 097-11764-00042, issued March 10, 2000, SSM 097-11362-00042, issued August 31, 2000, SPM 097-24287-00042, issued on August 23, 2007, and SPM 097-23497-00042, the following facilities are limited as indicated in the table below:

Unit/ Stack ID	PM/PM_{10} Limit (gr/dscf)	PM/PM_{10} Limit (lb/hr)	PM/PM_{10} Limit (ton/yr)
577-2	0.01	1.29	5.65
577-5	0.009	0.35	1.52
577-6	0.009	0.35	1.52
577-7	0.009	0.35	1.52
577-8	0.009	0.35	1.52
577-9	0.009	0.35	1.52
577-10	0.009	0.35	1.52
5549-3	0.01	0.15	0.64
5549-4	0.01	0.15	0.64
5549-7	0.01	0.039	0.17
5549-8	0.01	0.039	0.17

Unit/ Stack ID	PM/PM_{10} Limit (gr/dscf)	PM/PM_{10} Limit (lb/hr)	PM/PM_{10} Limit (ton/yr)
5549-9	0.01	0.039	0.17
5549-10	0.01	0.039	0.17
5549-12	0.01	0.13	0.57
5549-13	0.01	0.98	4.29
5549-14	0.01	0.24	1.07
5502-3, 5502-4 & 5503-6 (stack 5502-3)	0.01	0.96	4.393
5502-5	0.01	1.13	5.177
5503-1	0.01	1.53	6.977
5503-2 through 5503-5	0.01	0.71	3.11
5502-6	0.01	0.99	4.349
5549-16	0.01	0.02	0.08
5549-17	0.01	0.04	0.15
5549-18	0.01	0.28	1.21
5549-19	0.01	0.24	1.04
5549-20	0.01	0.93	4.05
5549-21	0.01	1.2	5.27
5549-26	0.01	0.26	1.16
71-9	0.01	0.13	0.57
5552-1	0.01	0.03	0.13
5552-2	0.01	0.21	0.9

(b) The combined input of corn grind to units 5502-1A (Section D.1), 5502-1B (Section D.1), 5502-1D (Section D.1), 5502-3, 5502-4, 5502-5, 5502-6, 5502-7, 5503-1, 5503-2, 5503-3, 5503-4, 5503-5, and 5503-6 shall not exceed 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit and the limits set in D.1.1(c) and D.2.1(a) limits PM/PM10 emissions to less than or equal to 43.862 tons per year and will render the requirements of 326 IAC 2-2 not applicable.

(c) The input of starch to unit 5549-13 shall not exceed 14,010 tons per twelve consecutive month period with compliance determined at the end of each month. The emission rate shall not exceed 0.61 lb PM/PM10 per ton of starch.

Compliance with these limits will render the requirements of 326 IAC 2-2 (Prevention Significant Deterioration) not applicable.

D.2.2 Particulate Matter [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, the particulate matter emissions from facilities 71-7, 577-2, 54-1, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-10, 5549-12, 5549-13, 5549-14,

5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2 through 5503-5, 5503-6, the spray agglomeration process (consisting of units 5549-17 through 5549-21, and 5549-26), 71-9, 5552-1, and 5552-2 shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

Compliance with the limits in Condition D.2.1 for facilities 71-7, 577-2, 54-1, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-10, 5549-12, 5549-13, 5549-14, 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2 through 5503-5, 5503-6, the spray agglomeration process (consisting of units 5549-17 through 5549-21, and 5549-26), 71-9, 5552-1, and 5552-2 will ensure compliance with the requirements of 326 IAC 6.5-1-2.

D.2.3 Particulate Matter - Marion County [326 IAC 6.5-6-25]

(a) Pursuant to 326 IAC 6.5-6-25, the particulate matter emissions from facility 42-10 shall not exceed 0.03 gr/dscf and 2.4 tons per year.

(b) Pursuant to 326 IAC 6.5-6-25, the particulate matter emissions from facility 56-1 shall not exceed 0.02 gr/dscf and 7.02 tons per year.

(c) Pursuant to 326 IAC 6.5-6-25, the particulate matter emissions from facility 71-1 shall not exceed 0.03 gr/dscf and 0.9 tons per year.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for facilities 577-2, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-14, 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2 through 5503-5, 5503-6, 5549-17 through 5549-21, 5549-26, 71-9, 5552-1, and 5552-2 and their respective control devices.

Compliance Determination Requirements

D.2.5 Particulate Control

(a) In order to comply with Conditions D.2.1, D.2.2, and D.2.3, the respective baghouses for particulate control, including those integral to the process, shall be in operation and control particulate emissions from the respective facilities listed in this section at all times those facilities are in operation.

(b) In order to comply with Conditions D.2.1 and D.2.2, the high efficiency cyclones for particulate control shall be in operation and control particulate emissions from facilities 5502-5 and 5502-6 at all times the respective facilities are in operation.

(c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.6 Visible Emissions Notations

(a) Visible emission notations of the exhaust from stacks 5549-3, 5549-4, and 5549-13 shall be performed once per day during normal daylight operations when the respective facilities are in operation. A trained employee shall record whether emissions are normal or abnormal. A notation of abnormal visible emissions is not a deviation from this permit.

(b) Visible emission notations of the exhaust from stacks 71-9, 5552-1, 5552-2, 5503-2, 577-2, 5503-1, 5502-3, 577-5 through 577-10, 5549-7 through 5549-10, 5549-12, 5549-14, 5549-17 through 5549-21, and 5549-26 shall be performed once per day during normal daylight operations when the respective facilities are in operation. A trained employee shall record whether emissions are normal or abnormal.

(c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(f) 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.

D.2.7 Parametric Monitoring for Baghouses

(a) The Permittee shall record the pressure drop across the baghouses used in conjunction with facilities 5502-3, 5503-6 and 5549-13 at least once per day when the respective facilities are in operation.

(b) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with facilities 577-2, 5549-20, 5549-21, 5503-2, 5503-3, and 5503-4 at least once per day when the respective facilities are in operation.

(c) When, for any one reading, the pressure drop across the baghouses are outside the normal range of 1.0 to 8.0 inches of water or a range established during the last stack test, the Permittee shall take reasonable response steps in accordance with Section C - Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Section C- Response to Excursions or Exceedances shall be considered a deviation from this permit.

(d) The instrument used for measuring the pressure drop shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated, maintained, and operated according to the Preventive Maintenance Plan.

D.2.8 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit~~s~~ and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.2.9 Cyclone Failure Detection

In the event that cyclone failure has been observed:

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

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

D.2.10 Record Keeping Requirements

(a) To document compliance with Condition D.2.1(c), the Permittee shall maintain monthly records of the input of starch for unit 5549-13.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain a daily record of visible emission notations of the stack exhausts. 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) To document compliance with Condition D.2.7, the Permittee shall maintain a daily record of the pressure drop across the baghouses used in conjunction with facilities 5502-3, 5503-6, 5549-13, 577-2, 5549-20, 5549-21, 5503-2, 5503-3, and 5503-4. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

The records used to document compliance with Conditions D.1.1 are sufficient to document compliance with Conditions D.2.1(b) and D.2.1(c).

D.2.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1(c), (b), and (d) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their

equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(a) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations: [326 IAC 2-7-1(21)(G)(xxiii)]

(1) One (1) DSE Hopper #9, identified as unit 42-3A; [326 IAC 6.5-6-25]

(2) One (1) DSE Hopper #10, identified as unit 42-3B; [326 IAC 6.5-6-25]

(3) One (1) DSE Hopper #11, identified as unit 42-3C; [326 IAC 6.5-6-25]

(4) One (1) DSE Hopper #12, identified as unit 42-3D; [326 IAC 6.5-6-25]

(5) One (1) DSE Hopper #13, identified as unit 42-3E; [326 IAC 6.5-6-25]

(6) One (1) DSE Hopper #14, identified as unit 42-3F; [326 IAC 6.5-6-25]

(7) One (1) DSE Hopper #2, identified as unit 42-7A; [326 IAC 6.5-6-25]

(8) One (1) DSE Hopper #4, identified as unit 42-7B; [326 IAC 6.5-6-25]

(9) One (1) DSE Hopper #6, identified as unit 42-7C; [326 IAC 6.5-6-25]

(10) One (1) DSE Hopper #1, identified as unit 42-8A; [326 IAC 6.5-1-2]

(11) One (1) DSE Hopper #3, identified as unit 42-8B; [326 IAC 6.5-1-2]

(12) One (1) DSE Hopper #5, identified as unit 42-8C; [326 IAC 6.5-1-2]

(13) One (1) DSE Hopper #7, identified as unit 42-8D; [326 IAC 6.5-1-2]

(14) One (1) CWS #8 Mill Receiver; identified as unit 63-1A; [326 IAC 6.5-1-2]

(15) One (1) CWS Entoleter Mill; identified as unit 63-17; [326 IAC 6.5-1-2]

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

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

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: operations M1 through M4 and RSP shop. [326 IAC 3-7-1(21)(G)(vi)(CC)][326 IAC 8-3-3]

(c) Paved and unpaved roads and parking lots with public access. [326 IAC 2-7-1(21)(g)(xiii)][326 IAC 6-4]

(d) Emission units or activities with potential uncontrolled PM10 emissions of less than 5 pounds per hour or 25 pounds per day: [326 IAC 2-7-1(21)(B)]

(1) One (1) 152-1 Filter Receiver; [326 IAC 6.5-1-2]

(2) One (1) 152-2 Mixer baghouse; [326 IAC 6.5-1-2]

(3) One (1) 152-3 Starch Cooler Filter Receiver Bld 852; [326 IAC 6.5-1-2]

(4) One (1) 152-4 Starch Mixer 2 Filter/Receiver Bld 852A; [326 IAC 6.5-1-2]

(5) One (1) 152-5 Starch Mixer 2 Bld 852A; [326 IAC 6.5-1-2]

(6) One (1) 152-6 Starch Storage Hopper; [326 IAC 6.5-1-2]

(7) One (1) 128-3 Starch Hopper D/C; [326 IAC 6.5-1-2]

(8) One (1) DSW Chemical Blender Bag Slitter, identified as unit 61-15; [326 IAC 6.5-1-2]

(9) One (1) DSE Hopper #8, identified as unit 42-4; [326 IAC 6.5-6-25]

(10) One (1) Dextrin #1 System Cooler Conveyor, identified as unit 61-3; [326 IAC 6.5-1-2]

(11) One (1) Dextrin Flash Dryer, identified as unit 61-9; [326 IAC 6.5-6-25]

(12) One (1) Dextrin #3 System Cooler, identified as unit 61-22; [326 IAC 6.5-1-2]

(13) One (1) Dextrin #2 System Cooler Conveyor, identified as unit 61-23; [326 IAC 6.5-1-2]

(14) One (1) CWS South Conveying, identified as unit 63-4; [326 IAC 6.5-1-2]

(15) One (1) CWS North Conveying, identified as unit 63-5; [326 IAC 6.5-1-2]

(16) One (1) DSE North Packer, identified as unit 42-1; [326 IAC 6.5-6-25]

(17) One (1) DSE South Packer, identified as unit 42-9; [326 IAC 6.5-1-2]

(18) One (1) sodium sulfate conveying system, identified as unit 40-1; [326 IAC 6.5-1-2]

(19) One (1) DSE Negative Receiver, identified as unit 42-6; [326 IAC 6.5-6-25]

(20) One (1) DSE Railcar Loading - East Track, identified as unit 42-11; [326 IAC 6.5-1-2]

(21) One (1) DSE Railcar Loading - West Track, identified as unit 42-12; [326 IAC 6.5-1-2]

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

(22) One (1) Dextrin #1 System Mixer, identified as unit 61-1; [326 IAC 6.5-1-2]

(23) One (1) Dextrin #1 System Cookers, identified as unit 61-2; [326 IAC 6.5-1-2]

(24) One (1) Dextrin #2 System Mixer, identified as unit 61-6; [326 IAC 6.5-6-25]

(25) Two (2) Dextrin #2 System East and West Tanks, identified as unit 61-7; [326 IAC 6.5-1-2]

(26) One (1) Starch Storage Silo #3 Receiver, identified as unit 61-11; [326 IAC 6.5-1-2]

(27) One (1) Starch Storage Silo #1 Receiver, identified as unit 61-12; [326 IAC 6.5-1-2]

(28) One (1) Starch Storage Silo #1, identified as unit 61-13; [326 IAC 6.5-1-2]

(29) One (1) Dextrin #1 System Packer, identified as unit 61-14; [326 IAC 6.5-6-25]

(30) One (1) DSW Chemical Blender Tank; identified as unit 61-14A; [326 IAC 6.5-6-25]

(31) One (1) Dextrin System Acidifiers; identified as unit 61-16; [326 IAC 6.5-1-2]

(32) One (1) Dextrin #2 System Cooler; identified as unit 61-18; [326 IAC 6.5-1-2]

(33) One (1) Dextrin #3 System Cookers; identified as unit 61-19; [326 IAC 6.5-1-2]

(34) One (1) Starch Storage Silo #2; identified as unit 61-20; [326 IAC 6.5-1-2]

(35) One (1) Starch Storage Silo #2 Receiver; identified as unit 61-21; [326 IAC 6.5-1-2]

(36) One (1) Dextrin #3 System Mixer; identified as unit 61-24; [326 IAC 6.5-1-2]

(37) One (1) Dextrin #3 System West Tank; identified as unit 61-25; [326 IAC 6.5-1-2]

(38) One (1) Dextrin #3 System East Tank; identified as unit 61-26; [326 IAC 6.5-1-2]

(39) One (1) Grain Elevator, identified as unit 56-2; [326 IAC 6.5-6-25]

(40) One (1) CWS #7 Dryer Receiver; identified as unit 63-3; [326 IAC 6.5-1-2]

(41) One (1) CWS Packer; identified as unit 63-9; [326 IAC 6.5-1-2]

(42) One (1) Liquid Glue Bag Dump; identified as unit 63-12; [326 IAC 6.5-1-2]

(43) One (1) CWS #9 and #10 Dryers Receiver; identified as unit 63-15; [326 IAC 6.5-1-2]

(44) One (1) CWS #11, #12, and #13 Dryers; identified as unit 63-16; [326 IAC 6.5-1-2]

(45) One (1) Starch Hopper D/C, identified as unit 128-3; [326 IAC 6.5-1-2]

(46) One (1) CWS South Raw Material Dump; identified as unit 63-18; [326 IAC 6.5-1-2]

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

(47) One (1) DSW Negative Receiver; identified as unit 63-20; [326 IAC 6.5-1-2]

(48) Two (2) DSW Hoppers #17 and #18; identified as unit 71-2; [326 IAC 6.5-6-25]

(49) One (1) Dextrin Packer; identified as unit 71-3; [326 IAC 6.5-1-2]

(50) One (1) DSW Hopper #13, identified as unit 71-4A; [326 IAC 6.5-6-25]

(51) One (1) DSW Hopper #1; identified as unit 71-5A; [326 IAC 6.5-6-25]

(52) One (1) DSW Hopper #2; identified as unit 71-5B; [326 IAC 6.5-6-25]

(53) One (1) DSW Hopper #3; identified as unit 71-5C; [326 IAC 6.5-6-25]

(54) One (1) DSW Hopper #4; identified as unit 71-5D; [326 IAC 6.5-6-25]

(55) One (1) DSW Hopper #5; identified as unit 71-5E; [326 IAC 6.5-6-25]

(56) One (1) DSW Hopper #6; identified as unit 71-5F; [326 IAC 6.5-6-25]

(57) One (1) DSW Hopper #7; identified as unit 71-5G; [326 IAC 6.5-6-25]

(58) One (1) DSW Hopper #8; identified as unit 71-5H; [326 IAC 6.5-6-25]

(59) One (1) DSW Hopper #9; identified as unit 71-5I; [326 IAC 6.5-6-25]

(60) One (1) DSW Hopper #10; identified as unit 71-5J; [326 IAC 6.5-6-25]

(61) One (1) DSW Hopper #11; identified as unit 71-5K; [326 IAC 6.5-6-25]

(62) One (1) DSW Hopper #12; identified as unit 71-5L; [326 IAC 6.5-6-25]

(63) One (1) DSW Bulk Car Loading; identified as unit 71-8; [326 IAC 6.5-1-2]

(64) One (1) RSP Bulk Bag Packing; identified as unit 577-1; [326 IAC 6.5-1-2]

(65) One (1) RSP Bulk Loading System A; identified as unit 577-4; [326 IAC 6.5-1-2]

(66) One (1) RSP Bulk Loading Fugitive Dust Collector; identified as unit 577-4A; [326 IAC 6.5-1-2]

(67) One (1) CWS Packing Hopper; identified as unit 578-2; [326 IAC 6.5-1-2]

(68) One (1) CWS Milling System, identified as unit 578-3; [326 IAC 6.5-1-2]

(69) One (1) CATO Cooling and Conveying, identified as unit 581-2; [326 IAC 6.5-1-2]

(70) One (1) RSP South Packing Line, identified as unit 577-3; [326 IAC 6.5-1-2]

(71) One (1) Starch Filter/Receiver 2 Bld 852, identified as unit 152-7; [326 IAC 6.5-1-2]

(72) One (1) Starch Mixer 4 Bld 852A Filter Receiver, identified as unit 152-8; [326 IAC 6.5-1-2]

(73) One (1) Starch Mixer 4 Bld 852A, identified as unit 152-9; [326 IAC 6.5-1-2]

(74) One (1) Starch Mixer 3 Bld 852A Filter Receiver, identified as unit 152-10; [326 IAC 6.5-1-2]

(75) One (1) Starch Mixer 3 Bld 852A, identified as unit 152-11; [326 IAC 6.5-1-2]

(76) One (1) FG Bulk Bag Bin Vent Bld 800, identified as unit FA-60582; [326 IAC 6.5-1-2]

(77) One (1) Blending Bin identified as unit TF31901 venting through product recovery DC-31901, Bld 630, venting out stack 1; [326 IAC 6.5-1-2]

(78) One (1) Base Bin identified as unit TF31902 venting through product recovery DC-31902, Bld 630, venting out stack 2; [326 IAC 6.5-1-2]

(79) One (1) Product Bin identified as unit TF31991 venting through product recovery DC-31991, Bld 630, venting out stack 3; [326 IAC 6.5-1-2]

(80) One (1) Surge Tank Bin identified as unit SH31913 venting through product recovery DC-31911, Bld 630, venting out stack 7; [326 IAC 6.5-1-2]

(81) One (1) Bulk Bag Unload Bin with integral dust collector , identified as unit DC-31900, Bld 630, venting out stack 8; [326 IAC 6.5-1-2]

(82) One (1) FBR exhaust through product recovery metal filters, Bld 630, identified as unit TR31912 venting out stack 5; [326 IAC 6.5-1-2]

(83) One (1) starch dryer identified as unit T-1, constructed in 2005, with a maximum production rate of 300 lbs/hr, with emissions controlled by integral product collector/cyclone and duct collector and exhausting through T-1 stack; [326 IAC 6.5-1-2]

(84) One (1) Line 1 South Packing Hopper, identified as unit 5549-22, constructed in 2006, with emissions controlled by integral product collector and exhausting through stack 5549-22. [326 IAC 6.5-1-2]

(85) One (1) CSW conveying cyclone operation, identified as unit 578-1, constructed in 2008, with emissions controlled by a baghouse and exhausting through stack 578-1. [326 IAC 6.5-1-2]

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

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

D.3.1 Particulate Matter [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, the particulate matter emissions from all insignificant activities listed above which have a potential to emit PM, and are not subject to the requirements of 326 IAC 6.5-6-25, shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

D.3.2 Particulate Matter - Marion County [326 IAC 6.5-6-25]

Pursuant to 326 IAC 6.5-6-25, the following insignificant activities are limited as indicated in the table below:

Facility	PM Limit (gr/dscf)	PM Limit (ton/yr)
56-2	0.01	11.3
71-2	0.03	2.6
61-6	0.03	0.1
61-14A	0.029	0.6
61-14	0.028	1.2
42-4	0.029	2.3
61-9	0.016	4.1
42-1	0.03	0.9
42-6	0.03	2.5
42-8	0.03	4.2
42-7A	0.032	1.7
42-7B	0.032	1.7
42-7C	0.032	1.7
42-3A	0.032	1.8
42-3B	0.032	1.8
42-3C	0.032	1.8
42-3D	0.032	1.8
42-3E	0.032	1.8
42-3F	0.032	1.8
71-4A	0.03	0.3
71-5A	0.026	0.3
71-5B	0.026	0.3
71-5C	0.026	0.3
71-5D	0.026	0.3
71-5E	0.026	0.3
71-5F	0.026	0.3
71-5G	0.026	0.3
71-5H	0.026	0.3
71-5I	0.026	0.3
71-5J	0.026	0.3

Facility	PM Limit (gr/dscf)	PM Limit (ton/yr)
71-5K	0.026	0.3
71-5L	0.026	0.3

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements; and

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120°F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

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

Compliance Determination Requirements

D.3.5 Particulate Control

In order to comply with Conditions D.3.1 and D.3.2, the baghouses for particulate control, including those integral to the process, shall be in operation and control particulate emissions from all facilities listed in this section at all times those respective facilities are in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

and

City of Indianapolis
Office of Environmental Services

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name:	National Starch and Chemical Company
Source Address:	1515 South Drover Street, Indianapolis, IN 46221
Mailing Address:	1515 South Drover Street, Indianapolis, IN 46221
Part 70 Permit No.:	T097-7714-00042

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

Please check what document is being certified:

Annual Compliance Certification Letter

Test Result (specify)

Report (specify)

Notification (specify)

Affidavit (specify)

Other (specify)

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

Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178 Fax: 317-233-6865

and

City of Indianapolis Office of Environmental Services

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name:	National Starch and Chemical Company
Source Address:	1515 South Drover Street, Indianapolis, IN 46221
Mailing Address:	1515 South Drover Street, Indianapolis, IN 46221
Part 70 Permit No.:	T097-7714-00042

This form consists of 2 pages **Page 1 of 2**

This is an emergency as defined in 326 IAC 2-7-1(12)

- 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
and
City of Indianapolis
Office of Environmental Services

Part 70 Quarterly Report

Source Name: National Starch and Chemical Company
Source Address: 1515 South Drover Street, Indianapolis, IN 46221
Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
Part 70 Permit No.: T097-7714-00042
Facilities: 5502-1A, 5502-1B, 5502-1D, 5502-3, 5502-4, 5502-5, 5502-6, 5502-7, 5503-1, 5503-2, 5503-3, 5503-4, 5503-5, and 5503-6
Parameter: Combined input of corn grind
Limit: The combined input of corn grind to units 5502-1A, 5502-1B, 5502-1C, 5502-3, 5502-4, 5502-5, 5502-6, 5502-7, 5503-1, 5503-2, 5503-3, 5503-4, 5503-5, and 5503-6 shall not exceed 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month.

QUARTER:_____YEAR:_____

Month	Corn grind (bushels)	Corn grind (bushels)	Corn grind (bushels)
	This Month	Previous 11 Months	12 Month 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
and
City of Indianapolis
Office of Environmental Services

Part 70 Quarterly Report

Source Name: National Starch and Chemical Company
Source Address: 1515 South Drover Street, Indianapolis, IN 46221
Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
Part 70 Permit No.: T097-7714-00042
Facilities: 5549-1 and 5549-2
Parameter: Combined input of starch
Limit: The combined input of starch for units 5549-1 and 5549-2 shall not exceed 22,500 tons per twelve consecutive month period with compliance determined at the end of each month.

QUARTER:_____YEAR:_____

Month	Starch (tons)	Starch (tons)	Starch (tons)
	This Month	Previous 11 Months	12 Month 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
and
City of Indianapolis
Office of Environmental Services

Part 70 Quarterly Report

Source Name: National Starch and Chemical Company
Source Address: 1515 South Drover Street, Indianapolis, IN 46221
Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
Part 70 Permit No.: T097-7714-00042
Facilities: 5502-1A, 5502-1B, 5502-1C, and 5502-1D
Parameter: Total natural gas usage
Limit: The combined input of natural gas to 5502-1A, 5502-1B, 5502-1C, and 5502-1D shall not exceed 1,851 million cubic feet (MMcf) per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit is equivalent to total NO_x emissions of less than or equal to 39 tons per twelve consecutive month period.

QUARTER:_____YEAR:_____

Month	Natural Gas (MMscf)	Natural Gas (MMscf)	Natural Gas (MMscf)
	This Month	Previous 11 Months	12 Month 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
and
City of Indianapolis
Office of Environmental Services

Part 70 Quarterly Report

Source Name: National Starch and Chemical Company
Source Address: 1515 South Drover Street, Indianapolis, IN 46221
Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
Part 70 Permit No.: T097-7714-00042
Facilities: 5549-13
Parameter: Input of starch
Limit: The input of starch to unit 5549-13 shall not exceed 14,010 tons per twelve consecutive month period with compliance determined at the end of each month.

QUARTER:_____YEAR:_____

Month	Starch (tons)	Starch (tons)	Starch (tons)
	This Month	Previous 11 Months	12 Month 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
and
City of Indianapolis
Office of Environmental Services

Part 70 Quarterly Report

Source Name: National Starch and Chemical Company
Source Address: 1515 South Drover Street, Indianapolis, IN 46221
Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
Part 70 Permit No.: T097-7714-00042
Facility: 575-2
Parameter: Amount of dry product processed
Limit: The amount of dry product processed by unit 575-2 shall not exceed 123,300 tons per twelve month consecutive period with compliance determined at the end of each month.

QUARTER:_____YEAR:_____

Month	Dry product (tons)	Dry product (tons)	Dry product (tons)
	This Month	Previous 11 Months	12 Month 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
and
City of Indianapolis
Office of Environmental Services

Part 70 Quarterly Report

Source Name: National Starch and Chemical Company
Source Address: 1515 South Drover Street, Indianapolis, IN 46221
Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
Part 70 Permit No.: T097-7714-00042
Facility: 40-3
Parameter: Amount of starch produced
Limit: The starch produced from unit 40-3 shall not exceed 145,610 tons per twelve consecutive month period with compliance determined at the end of each month.

QUARTER:_____YEAR:_____

Month	Starch produced (tons)	Starch produced (tons)	Starch produced (tons)
	This Month	Previous 11 Months	12 Month 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
and
City of Indianapolis
Office of Environmental Services

Part 70 Quarterly Report

Source Name: National Starch and Chemical Company
Source Address: 1515 South Drover Street, Indianapolis, IN 46221
Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
Part 70 Permit No.: T097-7714-00042
Facility: 575-2
Parameter: Amounts of methanol emitting corn starch and VOC-containing reagent
Limit: The amount of methanol emitting corn starch produced from unit 575-2 shall not exceed 11,995,200 pounds per twelve consecutive month period with compliance determined at the end of each month and the emission rate shall not exceed 0.0041 lb VOC per lb of starch.

QUARTER:_____YEAR:_____

Month	Starch (lb)	VOC reagent (lb)	Starch (lb)	VOC reagent (lb)	Starch (lb)	VOC reagent (lb)
	This Month	This month	Previous 11 Months	Previous 11 Months	12 Month Total	12 Month 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
and
City of Indianapolis
Office of Environmental Services

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: National Starch and Chemical Company
Source Address: 1515 South Drover Street, Indianapolis, IN 46221
Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
Part 70 Permit No.: T097-7714-00042

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

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

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.

Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services

Addendum to the Technical Support Document for a Part 70 Significant Source Modification and Significant Permit Modification

Source Name:	National Starch, LLC
Source Location:	1515 South Drover Street, Indianapolis, Indiana 46221
County:	Marion
SIC Code:	2046
Operation Permit No.:	T097-7714-00042
Operation Permit Issuance Date:	April 14, 2004
Significant Permit Modification No.:	SPM 097-23497-00042
Significant Source Modification No.:	SSM 097-24401-00042
Permit Reviewer:	Anh-tuan Nguyen

On September 20, 2008, the Office of Air Quality (OAQ) and the Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that National Starch, LLC had applied for a Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit relating to the identification of existing VOC emissions that were not previously identified from the Germ Dryer, Feed Dryer, and Gluten Dryer (emission units 5502-1A through 1C) which were permitted/constructed in 1997, combining two (2) emission points (Loose Feed Bins and the Truck Loadout) into one (1) emission point controlled by a common baghouse and exhausting to stack 5502-3, name change request, and other insignificant changes to the Part 70 permit. The notice also stated that OAQ and OES 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 October 18, 2008, National Starch, LLC submitted comments on the draft Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit. Upon further review, the OAQ and OES have decided to make the following revisions to the Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit. The TSD will remain as it originally appeared when published. Changes to the permit or technical support material that occur after the permit has published for public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Bolded language has been added and the language with strikeout has been deleted. The Table of Contents has been modified to reflect these changes.

Comment 1:

In order to be consistent throughout the permit in sections D.1.4(b)(l), D.1.4(b)(2), D.1.6(a), D.1.9(d), and D.1.11(k), OES should insert the phrase ‘or an equivalent thermal oxidation unit’ when explicit reference is made to the regenerative thermal oxidizer (RTO). The permit already has this equivalence language in D.1.8(f). Since the definition of Best Available Control Technology (BACT) is an emission limit (as noted in 326 IAC 1-2-6), OES should allow National Starch permit flexibility, if it is so desired in the future, for an equivalent thermal oxidization unit, other than the existing RTO to satisfy BACT requirements. Such

language in the permit may allow National Starch to proceed with a control device change more quickly, and thus maximize operational efficiencies.

Response 1:

Since BACT is an emission limitation or equipment standard, IDEM, OAQ, and OES agree that an equivalent thermal oxidation unit can be an option, as long as, National Starch can meet the limitations set by BACT when the equivalent thermal oxidization unit is installed. Permit conditions D.1.4(b), D.1.6(a), D.1.7, D.1.8(f), and D.1.11(k), have been revised as follows:

D.1.4 Volatile Organic Compounds [326 IAC 8-1-6]

...

(b) Pursuant to 326 IAC 8-1-6, the Permittee shall employ Best Available Control Technology (BACT) for emission units 5502-1A, 5502-1B, 5502-1C which has been determined to be:

(1) The VOC emissions from the Germ Dryer, Feed Dryer, and Gluten Dryer, identified as 5502-1A, 5502-1B, and 5502-1C, shall be controlled by a regenerative thermal oxidizer**, or an equivalent thermal oxidization unit**.

(2) The overall VOC efficiency for the regenerative thermal oxidizer**, or an equivalent thermal oxidization unit,** (including capture efficiency and destruction efficiency) shall be at least 95%.

D.1.6 Particulate, Sulfur Dioxide and VOC Control

(a) In order to comply with Conditions D.1.1, D.1.2 and D.1.4, the RTO**, or equivalent thermal oxidation unit,** shall be in operation and control particulate and VOC emissions from units 5502-1A, 5502-1B, and 5502-1C at all times when any of those units are in operation.

D.1.7 Testing Requirements [326 IAC 2-1.1-11]

(a) No later than five (5) years from January 11, 2006, in order to demonstrate compliance with Condition D.1.1 and D.1.4, the Permittee shall perform SO_2 and VOC testing on emission unit 5502-1A, 5502-1B, 5502-1C and 5502-1D, utilizing methods as approved by the Commissioner. Testing shall be repeated every five (5) years and shall be conducted in accordance with Section C - Performance Testing.

(b) Within 180 days after installation of an equivalent thermal oxidation unit, in order to demonstrate compliance with Condition D.1.1(e) and D.1.4(b), the Permittee shall perform VOC testing on emission unit 5502-1A, 5502-1B, 5502-1C, utilizing methods approved by the Commissioner. Testing shall be repeated every five (5) years and shall be conducted in accordance with Section C - Performance Testing.

D.1.8 Visible Emission Notations

...

(f) Visible emission notations of exhaust from stack 5502-7 are not required during scheduled, routine bakeout events involving the natural gas-fired Regenerative Thermal Oxidizer (RTO), or equivalent ~~control device~~ **thermal oxidation unit**, used for particulate and opacity control, provided that the Permittee meets the following conditions:

D.1.11 Record Keeping Requirements

...

(k) To document compliance with Condition D.1.9(d), the Permittee shall maintain continuous records (on a 3-hour average basis) for the RTO (unit 5502-1D)**, or an equivalent thermal oxidation unit,** combustion chamber temperature during normal operations.

Comment 2:

In condition D.1.9(d), OES should add a sentence stating that any additional, approved stack test data can re-set the parametric monitoring temperature. With this phrase added, future changes to the parametric monitoring temperature of the RTO, or the equivalent control device, would be able to made more quickly, and allow National Starch to maximize operational efficiencies. Suggested language (shown in strikeout or italic) for condition D.1.9(d) is noted below:

> A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until ~~the~~ *any* approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average temperature of the thermal oxidizer is below 1450°F. A three (3) hour average temperature that is below 1450°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit. *Approved stack test results may reset the three (3) hour average temperature of the thermal oxidizer to an alternative temperature and be incorporated via minor modification procedures.*

Response 2:

Permit condition D.1.9(d) has been revised as follows:

D.1.9 Parametric Monitoring for Scrubbers, RTO and 1st Effect Wash Water System

...

(d) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer**, or an equivalent thermal oxidation unit,** for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until ~~the~~ **any** approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average temperature of the thermal oxidizer**, or an equivalent thermal oxidation unit,** is below 1450°F. A three (3) hour average temperature that is below 1450°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit. **Approved stack test results may reset the three (3) hour average temperature of the thermal oxidizer, or an equivalent thermal oxidation unit, to an alternative temperature and be incorporated via minor modification procedures.**

...

Comment 3:

National Starch believes that the reference to specific emission units per D.1.4(b)(3) in condition D.1.11(a) is redundant. Units 5502-1A, 5502-1B, and 5502-1C are already specifically named in condition D.1.1(a)(1). Suggested, preferred language is:

D.1.11 Record Keeping Requirements

(a) To document compliance with Condition D.1.1(a)(1) and D.1.4(b)(3), the Permittee shall maintain monthly records of the combined input of corn grind for the units identified in Condition D.1.1(a)(1) ~~and D.1.4(b)(3)~~.

Response 3:

Permit Condition D.1.11(a) has been revised as follows:

D.1.11 Record Keeping Requirements

(a) To document compliance with Condition D.1.1(a)(1) and D.1.4(b)(3), the Permittee shall maintain monthly records of the combined input of corn grind for the units identified in Condition D.1.1(a)(1) ~~and D.1.4(b)(3)~~.

Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services

Technical Support Document (TSD) for a Part 70 Significant Permit Modification and Significant Source Modification

Source Description and Location

Source Name:	National Starch, LLC
Source Location:	1515 South Drover Street, Indianapolis, Indiana 46221
County:	Marion
SIC Code:	2046
Operation Permit No.:	T097-7714-00042
Operation Permit Issuance Date:	April 14, 2004
Significant Permit Modification No.:	SPM 097-23497-00042
Significant Source Modification No.:	SSM 097-24401-00042
Permit Reviewer:	Anh-tuan Nguyen

Existing Approvals

The source is operating under the following approvals:

(a) Part 70 Operating Permit No. T097-7714-00042 issued on April 14, 2004;

(b) First Significant Permit Modification No. SPM097-20891-00042 issued on December 8, 2006; and

(c) Second Significant Permit Modification No. SPM097-24287-00042 issued on August 23, 2007.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O_3	Attainment effective November 8, 2007, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.

Pollutant	Designation
[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic Nonattainment effective April 5, 2005 for PM2.5.	

(a) Ozone Standards

(1) 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.

(2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.

(3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.

(4) 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 ozone. Marion 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.

(b) PM2.5
Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants
Marion County has been classified as attainment or unclassifiable in Indiana for PM10, SO_2, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) 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.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2005 Office of air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) emission data.

Pollutant	Actual Emissions (tons/year)
PM	126.04
PM10	126.05
SO_2	8.67
VOC	21.55
CO	28.53
NO_x	65.81
HAP	Not reported

Description of Proposed Modification

The OAQ and OES have reviewed an application, submitted by National Starch and Chemical Company on August 11, 2006, relating to the identification of existing VOC emissions that were not previously identified from the Germ Dryer, Feed Dryer, and Gluten Dryer (emission units 5502-1A through 1C) which were permitted/constructed in 1997.

On January 11, 2006, National Starch and Chemical Company conducted a stack test, witnessed by the City of Indianapolis, Office of Environmental Services (OES), on the dryers' combined exhaust and RTO (emission unit 5502-1D) to identify VOC emissions and determine a VOC destruction efficiency for the RTO. With an average RTO temperature of 1468 degrees Fahrenheit, the destruction efficiency was 95.5 percent and the VOC outlet emission rate as carbon was 2.08 lbs/hr.

The RTO was originally installed in 1997, and was included as a requirement of this source's permit to control opacity and particulate emissions from the Germ Dryer, Feed Dryer, and Gluten Dryer (emission units 5502-1A through 5502-1C). At that time, within the industry sector, VOC emissions from these types of units had not been identified and therefore the permit did not address VOC emissions or require the operation of the RTO for VOC control. In 2002 the U.S. EPA, which acknowledged that industry representatives and regulatory agencies were unaware that these units generated VOC emissions, initiated an industry-specific initiative to quantify and properly permit corn wet-milling operations with regard to VOC emissions form drying operations. This source was part of this initiative, and has applied to establish a VOC limit with new operating parameters, monitoring requirements, and recordkeeping requirements for the existing RTO to limit VOC emissions to comply with 326 IAC 8-1-6 BACT and to make the requirements of 326 IAC 2-2 PSD not applicable. In order to demonstrate compliance the following is proposed:

1. A minimum RTO combustion chamber temperature of 1450 deg F will be maintained.

2. A minimum RTO control efficiency of 95%.

3. The RTO must be operating at all times when the Germ Dryer, Feed Dryer, or Gluten Dryer are operating.

On December 19, 2007, National Starch and Chemical Company submitted a second application requesting to combine two (2) emission points (Loose Feed Bins and the Truck Loadout) into one (1) emission point controlled by a common baghouse and exhausting to stack 5502-3. The following is a list of the modified emission units and pollution control devices:

1. Two (2) Loose Feed Bins, collectively identified as unit 5502-4, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5502-3.

2. One (1) Hammer Mill, identified as unit 5502-3, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5502-3.

On June 5, 2008, National Starch submitted an application requesting a name change from National Starch and Chemical Company to National Starch LLC. This application was assigned tracking number 26630 and has been combined into this significant permit modification. This request is considered an administrative change.

On August 25, 2008, National Starch submitted an application requesting to make three (3) insignificant changes to their Title V permit. This application was assigned tracking number 26920 and has been combined into this significant permit modification. The 578-1 dust collector is being returning to service. It was originally shutdown in 2001. The East Box operation has been removed and the dust collector 5549-16 is being relocated offsite. The West Box Packer Filter Receiver, identified as 5549-17, has now been renamed a Bulk Bag Packer Filter Receiver. These changes are considered administrative only. The addition of the 578-1 dust collector is considered an "Insignificant activity" as defined in 326 IAC 2-7-1(21)(B) with the potential uncontrolled emissions of PM10, less than five (5) pounds per hour or twenty-five (25) pounds per day (See Appendix A, page 1). These changes will also not trigger any new applicable requirements for violate any permit terms.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission 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, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	PTE Before Modification (tons/year)	PTE After Modification (tons/year)	Net Difference (tons/year)
VOC	428.06	21.40	403.66

The source modification to properly permit the Germ, Feed, and Gluten Dryers relative to VOC emissions is subject to 326 IAC 2-7-10.5(f)(2), a modification that is subject to 326 IAC 8-1-6. The modification to combine the two (2) emission points (Loose Feed Bins and Hammer Mill) is not subject to 326 IAC 2-7-10.5 because it is not considered a modification to an existing emission unit. A source modification is only required for the Germ, Feed and Gluten Dryers. Additionally, these modifications will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because these modifications involves

significant changes to the Part 70 Operating Permit, involves a relaxation of reporting and recordkeeping requirements of permit terms or conditions and involves a case-by-case determination of an emission limitation.

Permit Level Determination – PSD or Nonattainment NSR

The tables below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

The following table reflects the emissions associated with the modification to relating to the Germ, Feed, and Gluten Dyers.

	Potential to Emit (tons/year)						
Process/Emission Unit	**PM**	**PM10**	**SO_2**	**VOC**	**CO**	**NO_X**	**Single/ Combined HAP**
5502-1 A/B/C/D	19.86[(a)]	19.86[(a)]	35.3	21.4	42.2	39	-
PSD Significant Level	25	15	40	40	100	40	-

(a) Pursuant to M 097-00042-99-01, issued February 25, 1999, PM10 netting was conducted and the limit (of the stack) was reviewed for the initial Part 70 permit. See the Part 70 permit 097-7714-00042 TSD and the modification 097-00042-99-01 for a detailed discussion.

Prior to this modification, the RTO was originally permitted in 1997 to controlled opacity and PM emissions from the Germ Dryer, Feed Dryer and Gluten Dryer. At that time, there were no enforceable conditions on VOC. The controlled potential to emit of VOC emissions was never greater than 40 tons per year, since the RTO was indirectly controlling VOC emissions. The BACT analysis submitted by National Starch and Chemical Company will limit VOC emissions to less than 25 ton per year and also render the requirements of 326 IAC 2-2 not applicable.

The following table reflect the emissions associated with combining the two (2) emission points (Loose Feed Bins and Hammer Mill).

	Limited PM/PM10 PTE from M 097-00042-99-01 and later modified by SPM 097-24287-00042	New Limited PTE After Modification
Stack ID	ton/yr	ton/yr
5502-7	19.856	19.856
5502-3	4.393	4.393
5502-4	0.070	-
5502-5	5.177	5.177
5503-1	6.977	6.977
5503-2 through 5503-5	3.110	3.110
5502-6	4.349	4.349
Total:	43.932	43.862

The limited PM/PM10 PTE from M 097-00042-99-01 issued on February 25, 1999 was the result of a netting analysis to make 326 IAC 2-2 not applicable. The limited PTE was later modified by SPM 097-24287-0042 issued on August 23, 2007, in which National Starch combined two emission points reducing the limited potential to emit from 44.397 tons per year to 43.932 tons per year. Combining the limits on 5502-3 and 5502-4 will reduce the limited potential to emit from 43.932 tons per year to 43.862 tons per year and therefore, with netting considered, still render the requirements of 326 IAC 2-2 not applicable

These modifications to an existing major stationary source are not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. A significant emissions increase would be a net emissions increase or the potential of ten (10) tons per year or greater of PM2.5 and forty (40) tons per year or greater of SO2. There is no increase in PM2.5 and SO2 emissions from either modification. Therefore, 326 IAC 2-1.1-5 does not apply for PM2.5.

Since this source is considered a major PSD source and the unrestricted potential to emit of this modification is greater than forty (40) tons of VOC per year, this source has elected to limit the potential to emit of this modification to less than twenty-five (25) tons of VOC per year. National Starch and Chemical has elected to take the following VOC emission limit:

(a) The VOC emission rate from the Germ Dryer, Feed Dryer, and Gluten Dryer, identified as 5502-1A, 5502-1B and 5502-1C, controlled by an RTO, identified as 5502-1D, shall not exceed 4.89 pounds per hour.

Compliance with this emission limit will ensure that the potential to emit from this modification is less than forty (40) tons of VOC per year and will render the requirements of 326 IAC 2-2 not applicable.

The limit proposed by National Starch and Chemical was to ensure that the PSD (326 IAC 2-2) requirements were not applicable to this modification and to comply with BACT (326 IAC 8-1-6).

Federal Rule Applicability Determination

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this significant permit modification.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this significant permit modification.

(c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

Based on this evaluation, this modification does not involve a pollutant-specific emission unit with the potential to emit after control in an amount equal to or greater than 100 tons per year. Therefore, the requirments of 40 CFR 64, Compliance Assurance Monitoring, are not applicable.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 2-2 (PSD)
These modifications to an existing major stationary source are not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

326 IAC 2-1.1-5 (Nonattainment NSR)
Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. National Starch is considered a major source under Nonattainment NSR because PM2.5 emissions are greater than 100 tons per year. These modifications to an existing major stationary source are not major because the emissions increase is less than the Nonattainment NSR significant levels. There is no increase in PM2.5 and SO2 emissions from either modification. Therefore, the requirements of 326 IAC 2-1-1.5 are not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of emission units 5502-1A through 1D will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
Potential Emissions from the Germ Dryer, Feed Dryer, and Gluten Dryer, identified as 5502-1A, 5502-1B, and 5502-1C, exceed twenty five (25) tons per year. Therefore, VOC emissions shall be reduced using best available control technology (BACT). BACT for the Germ Dryer, Feed Dryer, and Gluten Dryer, identified as 5502-1A, 5502-1B, and 5502-1C shall be the following:

(a) The VOC emissions from the Germ Dryer, Feed Dryer, and Gluten Dryer, identified as 5502-1A, 5502-1B, and 5502-1C, shall be controlled by a regenerative thermal oxidizer.

(b) The overall VOC efficiency for the regenerative thermal oxidizer (including capture efficiency and destruction efficiency) shall be at least 95%.

(c) The VOC emissions from the Germ Dryer, Feed Dryer, and Gluten Dryer, identified as 5502-1A, 5502-1B, and 5502-1C, combined shall not exceed 4.89 pounds per hour (lbs/hr).

See Appendix B of this TSD for the BACT analysis.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ and OES, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section

D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source=s failure to take the appropriate corrective actions within a specific time period.

The Compliance Determination Requirements applicable to the modification related to the Germ, Feed and Gluten Dryers are as follows:

(a) The thermal oxidizer controlling VOC emissions from units 5502-1A, 5502-1B, and 5502-1C has applicable compliance determination and compliance monitoring conditions as specified below:

(1) In order to comply with the VOC limitations, the RTO shall be in operation when emission units 5502-1A, 5502-1B, and 5502-1C are in operation.

(2) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. The Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average temperature of the thermal oxidizer is below 1450°F. A three (3) hour average temperature that is below 1450°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

(b) The Feed Dryer, Germ Dryer, Gluten Dryer, and RTO identified as emission units 5502-1A, 5502-1B, 5502-1C, and 5502-1D shall have the following testing requirement.

Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing	Limit or Requirement
Feed Dryer, Germ Dryer, Gluten Dryer	RTO	5 years from January 11, 2006	VOC	Once every 5 years	4.89 lb/hr

There are no new Compliance Determination or Compliance Monitoring Requirements applicable to the modification related to combining the two (2) emission points (Loose Feed Bins and Hammer Mill). The Part 70 Permit already has existing Compliance Monitoring and Compliance Monitoring Requirements for stack 5502-3 and the associated baghouse.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 097-7714-00042. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

Change 1:

The facility description for the RTO listed in A.2 and D.1 and the Loose Feed Bins listed in A.2 and D.2 have been revised as follows:

(l) One (1) natural gas-fired Regenerative Thermal Oxidizer, identified as unit 5502-1D, constructed in 1997, a maximum heat input capacity of 18 MMBtu/hr, used for particulate**, VOC,** and opacity control, and exhausting to stack 5502-7.

(w) Two (2) Loose Feed Bins, collectively identified as unit 5502-4, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack ~~5502-4~~ **5502-3**.

Change 2:

In order to incorporate the VOC limits for the Germ Dryer, Feed Dryer, and Gluten Dryer (5502-1A, 5502-1B and 5502-1C), permit conditions D.1.1, D.1.4, D.1.6, D.1.7 and D.1.9 have been revised as follows:

D.1.1 Prevention of Significant Deterioration [326 IAC 2-2]

(a) Pursuant to CP 097-00042-97-01, issued March 24, 1997, A 097-00042-98-01, issued April 15, 1998, and in order to render the requirements of 326 IAC 2-2 not applicable:

(1) The combined input of corn grind to units 5502-1A, 5502-1B, 5502-1C, 5502-3 (Section D.2), 5502-4 (Section D.2), 5502-5 (Section D.2), 5502-6 (Section D.2), 5502-7 (Section D.2), 5503-1 (Section D.2), 5503-2 (Section D.2), 5503-3 (Section D.2), 5503-4 (Section D.2), 5503-5 (Section D.2) and 5503-6 (Section D.2) shall not exceed 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit and the limits set in D.1.1(c) and D.2.1(a) limits PM/PM10 emissions to less than or equal to ~~43.932~~ **43.862** tons per year and will render the requirements of 326 IAC 2-2 not applicable.

...

(e) The combined VOC emissions from units 5502-1A, 5502-1B, 5502-1C, and 5502-1D, shall not exceed a total of 4.89 pounds per hour. Compliance with this limit will limit VOC emissions to less than or equal to 21.4 tons of per year and will render the requirements of 326 IAC 2-2 not applicable to the Germ Dryer, Feed Dryer, and Gluten Dryer.

D.1.4 Volatile Organic Compounds [326 IAC 8-1-6]

(a) Pursuant to CP 097-00042-95-03, issued October 6, 1995, the amount of methanol emitting corn starch produced from unit 575-2 shall not exceed 11,995,200 pounds per twelve consecutive month period with compliance determined at the end of each month and the emission rate shall not exceed 0.0041 lb VOC per lb of starch. Compliance with this limit is equivalent to VOC emission of less than 25 tons per year and will render the requirements of 326 IAC 8-1-6 not applicable.

(b) Pursuant to 326 IAC 8-1-6, the Permittee shall employ Best Available Control Technology (BACT) for emission units 5502-1A, 5502-1B, 5502-1C which has been determined to be:

(1) The VOC emissions from the Germ Dryer, Feed Dryer, and Gluten Dryer, identified as 5502-1A, 5502-1B, and 5502-1C, shall be controlled by a regenerative thermal oxidizer.

(2) The overall VOC efficiency for the regenerative thermal oxidizer (including capture efficiency and destruction efficiency) shall be at least 95%.

(3) The VOC emissions from the Germ Dryer, Feed Dryer, and Gluten Dryer, identified as 5502-1A, 5502-1B, and 5502-1C, combined shall not exceed 4.89 pounds per hour (lbs/hr).

D.1.6 Particulate**,** ~~and~~ Sulfur Dioxide **and VOC** Control

(a) In order to comply with Conditions D.1.1, ~~and~~ D.1.2 **and D.1.4**, the RTO shall be in operation and control particulate **and VOC** emissions from units 5502-1A, 5502-1B, and 5502-1C at all times **when any of** those units are in operation.

...

D.1.7 Testing Requirements [326 IAC 2-1.1-11]

No later than five (5) years from January 11, 2006, in order to demonstrate compliance with Condition D.1.1 **and D.1.4**, the Permittee shall perform SO_2 **and VOC** testing on emission unit 5502-1A, 5502-1B, 5502-1C and 5502-1D, utilizing methods as approved by the Commissioner. Testing shall be repeated every five (5) years and shall be conducted in accordance with Section C- Performance Testing.

D.1.9 Parametric Monitoring for Scrubbers, RTO and 1st Effect Wash Water System

...

(d) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average temperature of the thermal oxidizer is below ~~1400~~ **1450**^{o}F. A three (3) hour average temperature that is below ~~1400~~ **1450**^{o}F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

~~(e) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.1.1, D.1.2 and D.1.3, as approved by IDEM.~~

~~(f) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average temperature of the thermal oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.~~

~~(g)~~ **(e)** The instruments used for determining the pH, pressure drop, flow rate and temperature shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated, maintained, and operated according to the Preventive Maintenance Plan.

D.1.11 Record Keeping Requirements

(a) To document compliance with Condition D.1.1(a)(1) **and D.1.4(b)(3)**, the Permittee shall maintain monthly records of the combined input of corn grind for the units identified in Condition D.1.1(a)(1) **and D.1.4(b)(3)**.

Change 3:

On November 8, 2007, a temporary emergency rule took effect redesignating Marion County to attainment for the eight-hour ozone standard. The Indiana Air Pollution Control Board has begun the process for a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 should take effect prior to the expiration of the emergency rule. Therefore, Marion County is no longer nonattainment for ozone under the 8-hour standard. Condition A.1 has been changed as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary wet corn milling plant which produces feed, gluten meal, germ meal, and heavy steepwater.

Source Address:	1515 South Drover Street, Indianapolis, IN 46221
Mailing Address:	1515 South Drover Street, Indianapolis, IN 46221
General Phone Number:	(317) 656-2325
SIC Code:	2046
County Location:	Marion
Source Location Status:	~~Nonattainment for 8 hour Ozone Standard~~ Nonattainment for PM2.5 Standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD~~, Emission Offset Rules,~~ and Nonattainment NSR Not 1 of 28 Source Categories Major Source, Section 112 of the Clean Air Act

Change 4:

Combining emission limits under the Hammer Mill limit of 4.393 tons per year will not exceed the PM10 significance level. Therefore, the separate emission limit and compliance monitoring requirement for the Two Loose Feed Bins (5502-4) are no longer required.

With the removal of the East Box operation and the West Box Operation being renamed, the emission limit, preventative maintenance plan, and compliance monitoring requirement associated with the East Box operation are no longer required. The facility descriptions will also be revised to reflect this change.

The facility descriptions listed in condition A.2 and section D.2 and permit conditions D.2.1, D.2.2, D.2.4, and D.2.6 have been revised as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

...

(pp) One (1) spray agglomeration process, constructed in 2000, consisting of the following units:

~~(1) East Box Packer Filter Receiver, identified as unit 5549-16, with emissions controlled by an integral baghouse, and exhausting to stack 5549-16.~~

~~(2)~~ **(1)** ~~West Box~~ **Bulk Bag** Packer Filter Receiver, identified as unit 5549-17, with emissions controlled by an integral baghouse, and exhausting to stack 5549-17.

~~(3)~~ **(2)** Line 1 Middle Packer, identified as unit 5549-18, with emissions controlled by an integral baghouse, and exhausting to stack 5549-18.

~~(4)~~ **(3)** Line 1 North Packer, identified as unit 5549-19, with emissions controlled by an integral baghouse, and exhausting to stack 5549-19.

~~(5)~~ **(4)** #2 Fugitive Dust Collector, identified as emission unit 5549-20, with emissions controlled by a baghouse, and exhausting to stack 5549-20.

~~(6)~~ **(5)** Line 1 Packing ambient D/C, identified as unit 5549-21, with emissions controlled by baghouse, and exhausting to stack 5549-21.

~~(7)~~ **(6)** Line 2 Packer, identified as unit 5549-26, with emissions controlled by an integral baghouse, and exhausting to stack 5549-26.

...

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

(pp) One (1) spray agglomeration process, constructed in 2000, consisting of the following units:

~~(1) East Box Packer Filter Receiver, identified as unit 5549-16, with emissions controlled by an integral baghouse, and exhausting to stack 5549-16.~~

~~(2)~~ **(1)** ~~West Box~~ **Bulk Bag** Packer Filter Receiver, identified as unit 5549-17, with emissions controlled by an integral baghouse, and exhausting to stack 5549-17.

~~(3)~~ **(2)** Line 1 Middle Packer, identified as unit 5549-18, with emissions controlled by an integral baghouse, and exhausting to stack 5549-18.

~~(4)~~ **(3)** Line 1 North Packer, identified as unit 5549-19, with emissions controlled by an integral baghouse, and exhausting to stack 5549-19.

~~(5)~~ **(4)** #2 Fugitive Dust Collector, identified as emission unit 5549-20, with emissions controlled by a baghouse, and exhausting to stack 5549-20.

~~(6)~~ **(5)** Line 1 Packing ambient D/C, identified as unit 5549-21, with emissions controlled by baghouse, and exhausting to stack 5549-21.

~~(7)~~ **(6)** Line 2 Packer, identified as unit 5549-26, with emissions controlled by an integral baghouse, and exhausting to stack 5549-26.

(qq) One (1) West Corn Truck Dump, identified as unit 56-1, constructed before 1968 and modified in 1996, with emissions controlled by a baghouse, and exhausting to stack 56-1.

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

D.2.1 Prevention of Significant Deterioration: PM and PM10 Limitations [326 IAC 2-2]

(a) Pursuant to CP 097-0042-97-01, issued March 24, 1997, M 097-00042-99-01, issued February 25, 1999, MSM 097-11764-00042, issued March 10, 2000, SSM 097-11362-00042, issued August 31, 2000, ~~and~~ SPM 097-24287-00042, **issued on August 23, 2007, and SPM 097-23497-00042,** the following facilities are limited as indicated in the table below:

Unit/ Stack ID	PM/PM_{10} Limit (gr/dscf)	PM/PM_{10} Limit (lb/hr)	PM/PM_{10} Limit (ton/yr)
577-2	0.01	1.29	5.65
577-5	0.009	0.35	1.52
577-6	0.009	0.35	1.52
577-7	0.009	0.35	1.52
577-8	0.009	0.35	1.52
577-9	0.009	0.35	1.52
577-10	0.009	0.35	1.52
5549-3	0.01	0.15	0.64

Unit/ Stack ID	PM/PM_{10} Limit (gr/dscf)	PM/PM_{10} Limit (lb/hr)	PM/PM_{10} Limit (ton/yr)
5549-4	0.01	0.15	0.64
5549-7	0.01	0.039	0.17
5549-8	0.01	0.039	0.17
5549-9	0.01	0.039	0.17
5549-10	0.01	0.039	0.17
5549-12	0.01	0.13	0.57
5549-13	0.01	0.98	4.29
5549-14	0.01	0.24	1.07
5502-3**, 5502-4** & 5503-6 (stack 5502-3)	0.01	0.96	4.393
~~5502-4~~	~~0.01~~	~~0.016~~	~~0.070~~

...

(b) The combined input of corn grind to units 5502-1A (Section D.1), 5502-1B (Section D.1), 5502-1D (Section D.1), 5502-3, 5502-4, 5502-5, 5502-6, 5502-7, 5503-1, 5503-2, 5503-3, 5503-4, 5503-5, and 5503-6 shall not exceed 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit and the limits set in D.1.1(c) and D.2.1(a) limits PM/PM10 emissions to less than or equal to ~~43.932~~ **43.862** tons per year and will render the requirements of 326 IAC 2-2 not applicable**.**

…

D.2.2 Particulate Matter [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, the particulate matter emissions from facilities 71-7, 577-2, 54-1, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-10, 5549-12, 5549-13, 5549-14, 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2 through 5503-5, 5503-6, the spray agglomeration process (consisting of units 5549-1~~6~~ **7** through 5549-21, and 5549-26), 71-9, 5552-1, and 5552-2 shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

Compliance with the limits in Condition D.2.1 for facilities 71-7, 577-2, 54-1, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-10, 5549-12, 5549-13, 5549-14, 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2 through 5503-5, 5503-6, the spray agglomeration process (consisting of units 5549-1~~6~~ **7** through 5549-21, and 5549-26), 71-9, 5552-1, and 5552-2 will ensure compliance with the requirements of 326 IAC 6.5-1-2.

...

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for facilities 577-2, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-14, 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2 through 5503-5, 5503-6, 5549-1~~6~~ **7** through 5549-21, 5549-26, 71-9, 5552-1, and 5552-2 and their respective control devices.

D.2.6 Visible Emissions Notations

...

(b) Visible emission notations of the exhaust from stacks 71-9, 5552-1, 5552-2, 5503-2, 577-2, 5503-1, ~~5502-4,~~ 5502-3, 577-5 through 577-10, 5549-7 through 5549-10, 5549-12, 5549-14, 5549-1~~6~~ **7** through 5549-21, and 5549-26 shall be performed once per day during normal daylight operations when the respective facilities are in operation. A trained employee shall record whether emissions are normal or abnormal.

...

Change 5:

To reflect the new company name, National Starch and Chemical Company has been changed to National Starch LLC throughout the permit

Change 6:

To reflect the addition of the emission unit 578-1, the facility description listed in A.3 and section D.3 has been revised as follows:

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

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

...

(84) One (1) Line 1 South Packing Hopper, identified as unit 5549-22, constructed in 2006, with emissions controlled by integral product collector and exhausting through stack 5549-22. [326 IAC 6.5-1-2]

(85) One (1) CSW conveying cyclone operation, identified as unit 578-1, constructed in 2008, with emissions controlled by a baghouse and exhausting through stack 578-1. [326 IAC 6.5-1-2]

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

(47) One (1) DSW Negative Receiver; identified as unit 63-20; [326 IAC 6.5-1-2]

(48) Two (2) DSW Hoppers #17 and #18; identified as unit 71-2; [326 IAC 6.5-6-25]

(49) One (1) Dextrin Packer; identified as unit 71-3; [326 IAC 6.5-1-2]

(50) One (1) DSW Hopper #13, identified as unit 71-4A; [326 IAC 6.5-6-25]

(51) One (1) DSW Hopper #1; identified as unit 71-5A; [326 IAC 6.5-6-25]

(52) One (1) DSW Hopper #2; identified as unit 71-5B; [326 IAC 6.5-6-25]

(53) One (1) DSW Hopper #3; identified as unit 71-5C; [326 IAC 6.5-6-25]

(54) One (1) DSW Hopper #4; identified as unit 71-5D; [326 IAC 6.5-6-25]

(55) One (1) DSW Hopper #5; identified as unit 71-5E; [326 IAC 6.5-6-25]

(56) One (1) DSW Hopper #6; identified as unit 71-5F; [326 IAC 6.5-6-25]

(57) One (1) DSW Hopper #7; identified as unit 71-5G; [326 IAC 6.5-6-25]

(58) One (1) DSW Hopper #8; identified as unit 71-5H; [326 IAC 6.5-6-25]

(59) One (1) DSW Hopper #9; identified as unit 71-5I; [326 IAC 6.5-6-25]

(60) One (1) DSW Hopper #10; identified as unit 71-5J; [326 IAC 6.5-6-25]

(61) One (1) DSW Hopper #11; identified as unit 71-5K; [326 IAC 6.5-6-25]

(62) One (1) DSW Hopper #12; identified as unit 71-5L; [326 IAC 6.5-6-25]

(63) One (1) DSW Bulk Car Loading; identified as unit 71-8; [326 IAC 6.5-1-2]

(64) One (1) RSP Bulk Bag Packing; identified as unit 577-1; [326 IAC 6.5-1-2]

(65) One (1) RSP Bulk Loading System A; identified as unit 577-4; [326 IAC 6.5-1-2]

(66) One (1) RSP Bulk Loading Fugitive Dust Collector; identified as unit 577-4A; [326 IAC 6.5-1-2]

(67) One (1) CWS Packing Hopper; identified as unit 578-2; [326 IAC 6.5-1-2]

(68) One (1) CWS Milling System, identified as unit 578-3; [326 IAC 6.5-1-2]

(69) One (1) CATO Cooling and Conveying, identified as unit 581-2; [326 IAC 6.5-1-2]

(70) One (1) RSP South Packing Line, identified as unit 577-3; [326 IAC 6.5-1-2]

(71) One (1) Starch Filter/Receiver 2 Bld 852, identified as unit 152-7; [326 IAC 6.5-1-2]

(72) One (1) Starch Mixer 4 Bld 852A Filter Receiver, identified as unit 152-8; [326 IAC 6.5-1-2]

(73) One (1) Starch Mixer 4 Bld 852A, identified as unit 152-9; [326 IAC 6.5-1-2]

(74) One (1) Starch Mixer 3 Bld 852A Filter Receiver, identified as unit 152-10; [326 IAC 6.5-1-2]

(75) One (1) Starch Mixer 3 Bld 852A, identified as unit 152-11; [326 IAC 6.5-1-2]

(76) One (1) FG Bulk Bag Bin Vent Bld 800, identified as unit FA-60582; [326 IAC 6.5-1-2]

(77) One (1) Blending Bin identified as unit TF31901 venting through product recovery DC-31901, Bld 630, venting out stack 1; [326 IAC 6.5-1-2]

(78) One (1) Base Bin identified as unit TF31902 venting through product recovery DC-31902, Bld 630, venting out stack 2; [326 IAC 6.5-1-2]

(79) One (1) Product Bin identified as unit TF31991 venting through product recovery DC-31991, Bld 630, venting out stack 3; [326 IAC 6.5-1-2]

(80) One (1) Surge Tank Bin identified as unit SH31913 venting through product recovery DC-31911, Bld 630, venting out stack 7; [326 IAC 6.5-1-2]

(81) One (1) Bulk Bag Unload Bin with integral dust collector , identified as unit DC-31900, Bld 630, venting out stack 8; [326 IAC 6.5-1-2]

(82) One (1) FBR exhaust through product recovery metal filters, Bld 630, identified as unit TR31912 venting out stack 5; [326 IAC 6.5-1-2]

(83) One (1) starch dryer identified as unit T-1, constructed in 2005, with a maximum production rate of 300 lbs/hr, with emissions controlled by integral product collector/cyclone and duct collector and exhausting through T-1 stack; [326 IAC 6.5-1-2]

(84) One (1) Line 1 South Packing Hopper, identified as unit 5549-22, constructed in 2006, with emissions controlled by integral product collector and exhausting through stack 5549-22. [326 IAC 6.5-1-2]

(85) One (1) CSW conveying cyclone operation, identified as unit 578-1, constructed in 2008, with emissions controlled by a baghouse and exhausting through stack 578-1. [326 IAC 6.5-1-2]

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

Conclusion and Recommendation

The operation of this source shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 097-24401-00042 and Significant Permit Modification 097-23497-00042. The staff recommends to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

Appendix A: Emission Calculations
Limited PTE for 5502-1A, 5502-1B, 5502-1C,and 5502-1D

Company Name: National Starch and Chemical Company
Address City IN Zip: 1515 South Drover Street
Part 70 permit no: 097-7714-00042
Siginificant Permit Modification no: SPM097-23497-00042
Significant Source Modification no: SSM097-24401-00042
Reviewer: A. Nguyen
Date: January-07

Process	Maximum Production (bushels/yr)	Maximum Production (bushels/hr)	Potential Inlet VOC emissions (lb/hr)	*Maximum Allowable Outlet VOC emissions	VOC Emissions (tons/yr)
Germ Dryer, Feed Dryer, Gluten Dryer, and RTO (5502-1A, 1B, 1C, &1D)	29,584,000	3,377	97.73	4.89	21.4

* Proposed VOC emission limit for this modification

Methodology
Calculations based upon January 11, 2006 stack test data.
Maximum Production (bushels/yr) - based on Part 70 permit limit
RTO destruction efficiency (95%) - based on 326 8-1-6 BACT analysis (Appendix B)
Maximum Inlet VOC emissions (lbs/hr) = Maximum production (bushels/hr) x 0.0289 lb VOC/bushel (stack test inlet value)
Maximum Outlet VOC emissions (lbs/hr) = Maximum Inlet (lbs/hr) x (1 - RTO destruction efficiency)
VOC emissions (tons/yr) = Maximum Outlet VOC emissions (lbs/hr) x 8760 hours x 1 ton/2000 lbs

PTE of 578-1 (PM & PM10)

	Maximum Loading	PTE	
Process	lbs/hr	lbs/day	tons/yr
CWS Packing (578-1)	0.1028	2.47	0.45

Appendix B

326 IAC 8-1-6 BACT ANALYSIS
Germ Dryer, Feed Dryer, and Gluten Dryer

Background

Source Name:	National Starch, LLC
Source Location:	1515 South Drover Street, Indianapolis, Indiana 46221
County:	Marion
SIC Code:	2046
Operation Permit No.:	T097-7714-00042
Operation Permit Issuance Date:	April 14, 2004
Significant Permit Modification No.:	SPM 097-23497-00042
Significant Source Modification No.:	SSM 097-24401-00042
Permit Reviewer:	Anh-tuan Nguyen

On January 11, 2006, National Starch, LLC conducted a stack test, witnessed by the City of Indianapolis, Office of Environmental Services (OES), on the dryers' combined exhaust and RTO (emission unit 5502-1D) to identify VOC emissions and determine a VOC destruction efficiency for the RTO. Potential emissions were greater than twenty-five (25) tons per year based on the inlet stack test value and the maximum production limit listed in the Part 70 permit. Therefore, the Germ Dryer, Feed Dryer, and Gluten dryer is subject to the requirements of 326 IAC 8-1-6.

In 2002 the U.S. EPA, which acknowledged that industry representatives and regulatory agencies were unaware that these units generated VOC emissions, initiated an industry-specific initiative to quantify and properly permit corn-wet milling operations with regard to VOC emissions from drying operations. This source was part of this initiative, and as result of the aforementioned test results, submitted an application on August 11, 2006 to address previously unidentified VOC emissions from the Germ Dryer, Feed Dryer, and Gluten Dryer (emission units 5502-1A through 5502-1C). In addition, in response to a request made by the Indiana Department of Environmental Management, Office of Air Quality (IDEM, OAQ) and the City of Indianapolis, Office of Environmental Services (OES), National Starch and Chemical Company submitted a BACT analysis on October 4, 2007 with additional information on October 24, 2007 and June 10, 2008.

The Indiana Department of Environmental Management, Office of Air Quality (IDEM, OAQ) and the City of Indianapolis, Office of Environmental Services (OES) conduct BACT analysis in accordance with the *"Top-Down" Best Available Control Technology Guidance Document* outlined in the 1990 draft USEPA *New Source Review Workshop Manual*, which outlines the steps for conducting a top-down BACT analysis. Those steps are listed below:

(a) Identify all potentially available control options;

(b) Eliminate technically infeasible control options;

(c) Rank remaining control technologies by control effectiveness;

(d) Evaluate the most effective controls and document the results; and

(e) Select BACT.

Also, in accordance with the "Top-Down" Best Available Control Technology Guidance Document outlined in the 1990 draft U.S EPA New Source Review Workshop Manual, BACT analyses take into account the energy, environmental, and economic impacts on the source. These reductions may be determined through the application of available control techniques, process design, and/or operational limitations. Such reductions are necessary to demonstrate that the emissions

remaining after application of BACT will not cause or contribute to air pollution thereby protecting public health and the environment.

This appendix addresses the BACT analysis and completes the requirement to incorporate the revision into the Title V permit.

Calculations

Emission Unit ID	Process	Potential VOC emissions - before controls (lb/hr)	Potential VOC emissions - before controls (tons/yr)	Maximum VOC emission - after controls (lb/hr)	Maximum VOC emissions - after controls (tons/yr)
5502-1A through 1C	Germ Dryer, Feed Dyer and Gluten Dryer	97.73	428.06	4.89	21.40

BACT Analysis

Step One - Identify all potentially available control options:

IDEM, OAQ and OES searched EPA=s RACT/BACT/LAER Clearinghouse (RBLC) and Indiana=s Air Permits to identify sources with emissions similar to this source. The search identified the following control options for similar processes (and similar size vent stream):

(a) Thermal Oxidation
(b) Wet Scrubbing

National Starch and Chemical Company also identified the following potential control methods:

(a) Carbon Adsorption
(b) Vapor Recovery
(b) Biofiltration
(c) Flaring

Step Two - Eliminate technically infeasible control options

(a) Thermal Oxidation. In thermal oxidation, volatile compounds are destroyed through oxidation at very high temperatures (typically greater than 1400 degree Fahrenheit). The heat given off in the oxidation reaction is returned to the system to minimize fuel costs. Regenerative thermal oxidation uses certain ceramic beds to capture heat from the combustion gases. As a ceramic bed reaches combustion temperatures, the bed is used to pre-heat the incoming gas stream while a new ceramic be is used to capture the heat within the exhaust gases. This option is feasible because National Starch and Chemical Company already owns and operates a regenerative thermal oxidation unit.

(b) Wet Scrubbing. In wet scrubbing, certain VOCs can be removed from a gas stream by using an appropriate scrubbing liquid. Mass transfer of a VOC occurs when the scrubbing liquid and the contaminated gas stream come into contact. VOCs are absorbed into the liquid and removed from the gas stream. VOC destruction is listed between 75% to 95%. This option is technically feasible if used as a stand alone control unit. This option is technically infeasible as an additional follow up technology because due to the high exhaust temperature of the existing RTO, a spray tower would be needed to get the temperature below 100 F in order for the pack bed tower to work properly. Also, there is no information on removal efficiencies at such a low VOC concentration.

(c) Carbon Adsorption. In carbon adsorption, VOCs can be removed from inlet air by physical adsorption onto the surface of carbon. The carbon adsorbs VOCs onto active

sites on the surface of the porous carbon granule. A typical carbon adsorption system consists of two parallel adsorption trains. While one carbon bed is on-line, the other is being regenerated using steam, hot air, or hot nitrogen. Moisture in the exhaust stream, and the presence of ketones, have proven to add operational difficulties to the effectiveness of carbon adsorption. Hot exhaust streams typically require cooling prior to the adsorption process. This option is technically infeasible due to the high volume, high temperature, and high moisture from the exhaust of the dryers.

(d) Vapor Recovery. Vapor Recovery units operate by chilling or pressurizing the VOC laden air stream and collecting the heavier hydrocarbon vapors. This technique has proven most efficient for effective streams containing VOCs with higher boiling points and at high VOC concentrations. This option is technically infeasible because the particulate matter in the exhaust stream would quickly clog up the condenser.

(e) Biofiltration. Biofilters use microorganisms to remove VOCs and other odiferous compounds. The VOC laden exhaust flows through a packed bed and transfers into a thin biofilm on the surface of the packing material. Microorganisms, including bacteria and fungi, are immobilized in the biofilm and degrade the VOCs. It has been proven that very large airflows may be treated with biofiltration, but often a large footprint has typically been required. One of the main challenges to optimum biofilter operation is maintaining proper moisture throughout the system. The tempered air (normally at or near 100 degrees F) is normally humidified before it enters the bed with a watering (spray) system, humidification chamber, bioscrubber, or biotrickling filter. Most critical for continued optimal performance of the microorganisms in the biofilter is a stable, warm temperature environment. Hot temperatures of the exhaust gases, or rapid swings in inlet temperature, can seriously impact operating performance of the biofilter. This option is technically infeasible because the exhaust temperature from the dryers is too high to ensure optimal performance.

(f) Flares. Flares are similar to thermal oxidation in that a VOC laden stream is oxidized at high temperatures, but in the case of a flare, the heat of combustion is released to the atmosphere. Flares can be enclosed, with the flame contained in an exhaust stack, or open, with the flame visible at the end of a burner pipe. A typical operational issue associated with flares is the ability to maintain a lit flame, along with opacity concerns. Flares are most commonly used as a safety device in chemical and petroleum industries for burning intermittent or emergency releases of VOCs. This option is technically infeasible as an additional follow on technology, after the existing RTO, because the low VOC concentration in the RTO exhaust stream would inevitably preclude the sustainability of a flame at the burner tip. Also, if used without the RTO, the flare would not address the PM from the exhaust stream. The RTO was initially installed to demonstrate compliance with the PM limit.

Step Three - Rank remaining control technologies by control effectiveness

The control technologies considered technically feasible is an RTO and a wet scrubber. Control efficiencies for RTOs in corn wet milling and related grain handling processes can vary based on design and typically range up to 98% destruction efficiency. 98% control is considered because it has been determined as BACT for similar drying operations in Indiana. National Starch's current RTO unit is operating at a base case of 95% VOC destruction efficiency, as determined by testing, and thus it is the second level of control considered. Wet scrubbing with control efficiency less than 95% is the third level of control considered.

Rank	Control Option	Control Efficiency (%)
1	Enhanced RTO	98
2	Existing RTO	95
3	Wet Scrubber	< 95

Step Four - Evaluate the most effective controls and document the results

Of the technically feasible options, the RTO yields the greatest reduction in VOC emissions. IDEM and OES are aware that recent corn processing expansions at comparable facilities have resulted in VOC BACT determinations for by-product facilities that exceeded 95 percent control. However, National Starch has conducted multiple control efficiency tests on its existing RTO and has determined that it is technically infeasible for the existing RTO to achieve 98 percent control efficiency. This finding is the result of several years of evaluation and reconfiguration of the unit and modifications that were made in an effort to achieve a control efficiency greater than 95%. One such modification involves the addition of a purge system feature. The purge system was never commissioned, since it was deemed unnecessary from a control standpoint to achieve compliance with the particulate emission limit listed in 326 IAC 6.5-1-2. In the Fall of 2007, the purge system was commissioned and with the new system, additional testing shows that 95% is still the maximum level of control that can be consistently achieved for this unit.

Given the history associated with this industry and the fact that this source had installed an RTO (for particulate control) in 1997, prior to the notice of the U.S. EPA's corn wet-milling operation initiative, consideration was given to National Starch with regard to BACT. National Starch has completed an economic cost analysis that would establish BACT at 95 percent control of VOCs. Essentially, this is the cost analysis that National Starch would have performed if the VOC emissions from the 1997 By-Products Rebuild Project had been identified prior to the construction in 1997. The 95 percent VOC destruction was chosen based on vendor guarantee and presumptive BACT for VOCs that would have been consistent with comparable BACTS for VOC sources in 1997.

Table 1 summarizes the costs that would be associated with 95 percent control efficiency.

Table1

	RTO with 95% capture and control efficiency	
CAPITAL COSTS		
Direct Capital Costs (DC)		
	Gas Flow:	
	Purchased Equipment Costs (PE)	Installed cost of RTO is assumed equal to Total Capital Investment
	Recuperative Thermal Oxidation System	
	Instrumentation (10% of Equipment, OAQPS Manual)	
	Access Way Addition (Engr. Estimate)	
	Sales Taxes (3% of Equipment)	
	Freight (5% of Equipment)	
	Total Purchased Equipment Cost (PE)	**$NA**
	Direct Installation Costs (DI)	Installed cost of RTO is assumed equal to Total Capital Investment
	Foundations & Supports (0.08 PE)	
	Erection & Handling (0.14 PE)	
	Electrical (0.04 PE)	
	Piping (0.02 PE)	
	Insulation + Painting (0.02 PE)	
	Site Preparation , etc.	
	Total Direct Installation Costs	**$NA**
	Total Direct Costs (DC)	**$NA**
Indirect Capital Costs (IC)		Installed

RTO with 95% capture and control efficiency	
CAPITAL COSTS	
Engineering & Supervision (0.1PE)	cost of RTO is assumed equal to Total Capital Investment
Construction & Field Expenses (0.05 PE)	
Contractor Fees (0.10 PE)	
Start Up + Performance Costs (0.03 PE)***0.02***	
Overall Contingencies (0.03 PE)	
IC Total	
Total Capital Investment (TCI) = Sum (DC + IC) =	$2,342,139
Capital Recovery at 7% interest over 20 years (0.0944*TCI)	$221,081
Operation and Maintenance (O & M)	
Direct ANNUAL COSTS (DA)	
Direct Operating Costs	$0
Operating Labor	
Operator (1.5 hr/shift, 3 shifts/day, 365 days/year @ $17.44 /man-hr	$28,640
Supervision (15% of Operator)	$4,296
Maintenance	
Labor (0.5 hr/shift, 3 shifts/day, 365 days/year @ $17.44 /man-hr	$9,547
Materials	$9,547
Utilities	
Natural Gas (Annual consumption 69,562 MMBtu @ $4.33/MMBtu) 1997 Dollars	$301,204
Electricity (Annual consumption 1,817,088 kW-hr @ $0.0368/kW-hr) 1997 Dollars	**$66,869**
Total Direct Annualized Costs (DA)	**$420,102**
Indirect Annual Costs (IA)	
Overhead (60% of Operating Labor and Maintenance)	$25,489.66
Administrative (2% of TCI) Property Tax and Insurance (2% of TCI)	$93,686
Indirect Annual Total	$119,175
O & M Total	**$420,102**
Total Annual Capital and O & M Costs (including Capital Recovery)	**$760,358**
Baseline VOC Emissions from the RTO current 95% control (tpy)	428.1
Total Pollutant Removed (tpy)	406.7
Cost Effectiveness,$/Ton VOC Removed	**$1,870**

Note: - Cost Factors are based on OAQPS Control Cost Manual (Ch. 3, 5th Ed., Dec 1995)

Environmental Impact Analysis

The purpose of this analysis is to assess the overall environmental implications of upgrading the RTO from 95 percent VOC destruction base case to 98 percent destruction. Mainly the impact of collateral emissions reporting from the required increase in energy consumption is considered.

The increase in VOC control comes at the expense of higher energy consumption and associated increased life cycle emissions of criteria pollutants and greenhouse gases. Operating the RTO purge system in order to reach 98 percent VOC destruction efficiency (destroying an additional 12 tons of VOC annually) will require approximately 5,200 MMBtu per year of additional energy input to the RTO. The associated energy increase, with the combustion of natural gas, results in annual emissions of 306 tons of carbon dioxide and smaller increases of other regulated criteria pollutants, including nitrogen oxides, and ozone precursor.

The increases of criteria pollutants and greenhouse gases (namely carbon dioxide) are an unbeneficial environmental impact associated with the increased VOC control efficiency.

Step Five - Select BACT

Control technology options considered in this analysis were limited because National Starch is in the unique situation of already owning and operating an effective control device. Constructed in 1997 as part of the By-Products Rebuild Project, the existing RTO would have been considered BACT for VOCs (had they been considered at that time) at its design rate of 95 percent control efficiency. Per *Step Four - Evaluate the most effective controls and document the results*, National Starch has shown that it is economically feasible to control VOCs from the By-Products Rebuild Project at the 95 percent destruction rate. Furthermore, the existing RTO has been proven to achieve 95 percent VOC destruction efficiency and has been maintained at this efficiency in order to achieve on-going permit compliance related to visible emissions and particulate matter. Thus, support for the 95 percent VOC control efficiency BACT determination is established by:

- 95 percent control would have met BACT in 1997
- 95 percent control was achieved following the By-Products Rebuild Project in 1997, when National Starch physically modified its by-products operations
- 95 percent control was and remains economically feasible
- 95 percent control is the guaranteed rating of the RTO, as installed
- 95 percent control has been achieved and maintained since construction in 1997
- 95 percent control results in a normalized emission rate (0.00136 pounds VOC per bushel of corn processed) that is comparable with other similar Indiana sources

However, there are key differences between those instances where 98 percent control has been established as BACT at comparable facilities.

- 98 percent control has been deemed BACT in comparable cases where physical modification (related to corn rate expansions) has occurred post-2005. The changes in corn processing rate for establishment of BACT at National Starch occurred in 1997, and an RTO was installed as part of this project.
- 98 percent control has been required in Consent Decrees, also issued since 2005, in instances when a new RTO was to be constructed. The RTO at National Starch was constructed in 1997.

Based on this analysis, it is not appropriate to establish BACT at National Starch at 98 percent VOC control since only comparable facilities with recent corn grinding rate expansions, or newly installed RTO's, have had to meet this level of limitation.

Thus it is not appropriate to establish BACT at National Starch at 98 percent VOC control since only comparable facilities with recent corn grinding rate expansions, or newly installed RTO's, have had to meet this level of limitation.

Furthermore, it appears that the economic costs for National Starch to achieve 98 percent control are economically infeasible. The costs associated with removing an additional 12.8 tons of VOC per year (difference between 95% and 98%), are excessive given the fact that National Starch had had this control in place and operation, operating at 95%, since 1997, and the original guarantee for this unit was 95%.

Therefore, 95 percent control efficiency, the likely BACT determination in 1997, when the existing RTO was installed and National Starch modified its corn grind rate, has been determined to be BACT under 326 IAC 8-1-6 for the Germ Dryer, Feed Dryer, and Gluten Dryer (emission units

5502-1A through 5502-1C).

This determination is consistent with previous BACT determinations made after 1997 for similar equipment. See Table 3 below for a brief summary of other BACT determinations for similar processes.

Table 3. Other Similar BACT Determinations*

Company/Location	Year Issued	Process	Control Required	Estimated Efficiency	Comments
Tate and Lyle Sagamore Lafeyette, IN	2004	Feed, Meal, and Germ Production Dryers	Scrubber followed by thermal oxidizer	95%	
Archer Daniels Midland Company Decatur, IL	2001	Gluten Feed Fiber Dryers, Gluten Meal Dryers, Germ Dryers	Regenerative thermal oxidizer	95%	Consent Decree
Endres Processing Ohio, LLC Upper Sandusky, OH	2003	Animal Feed Dryers and processing lines	Regenerative thermal oxidizer	95%	Cost effectiveness was $785/ton

* Additional BACT determinations were made subsequent to 2004 at or above 95% but are not included here based on previous discussions regarding the 1997 time period.

The RACT/BACT/LAER Clearinghouse database did not include cost effectiveness information for any of the determinations identified in Table 3 except for the last determination listed.

IDEM, OAQ and OES have determined that the following requirements represent BACT for the Germ Dryer, Feed Dryer, and Gluten Dryer at the source:

(a) The VOC emissions from the Germ Dryer, Feed Dryer, and Gluten Dryer shall be controlled by a regenerative thermal oxidizer.

(b) The overall VOC efficiency for the regenerative thermal oxidizer (including capture efficiency and destruction efficiency) shall be at least 95%.

(c) The VOC emission from the Germ Dryer, Feed Dryer, and Gluten Dryer combined shall not exceed 4.89 pounds per hour (lbs/hr).