



TO: Interested Parties / Applicant

DATE: August 29, 2007

RE: Custom Trading & Blending, Inc. / M167-24583-00133

FROM: George M. Needham
Director
Vigo County Air Pollution Control

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

If you have technical questions regarding the enclosed documents, please contact Vigo County Air Pollution Control at (812) 462-3433.



New Source Review and Minor Source Operating Permit

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT -- OFFICE OF AIR QUALITY AND VIGO COUNTY AIR POLLUTION CONTROL

**Custom Trading & Blending, Inc.
9766 S. Carlisle Street
Terre Haute, Indiana 47802**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M167-24583-00133	
Issued by:  George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: August 29, 2007 Expiration Date: August 29, 2012

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary animal feed production plant.

Source Address:	9766 S. Carlisle Street, Terre Haute, Indiana 47802
Mailing Address:	9766 S. Carlisle Street, Terre Haute, Indiana 47802
General Source Phone Number:	(812) 299-0233
SIC Code:	2048 (311119 NAICS)
County Location:	Vigo
Source Location Status:	Maintenance attainment for 8-hour ozone and SO ₂ standards
Source Status:	Attainment for all other criteria pollutants Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) 10 MMBtu/hr rotary dryer with the ability to burn both natural gas and saw dust, identified as dryer, approved for construction in 2007, with a maximum capacity of fourteen (14) tons per hour, using a cyclone for product recovery, and exhausting to stack Dryer-1.

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

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

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

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

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

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M167-24583-00133, 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 VCAPC, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.6 Enforceability

- (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 VCAPC, 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 VCAPC.

B.7 Severability

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

B.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

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

B.10 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and VCAPC on or before the date it is due.

B.12 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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

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

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

- (a) All terms and conditions of permits established prior to M167-24583-00133 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.15 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

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

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

- (b) A timely renewal application is one that is:
- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and VCAPC on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ and VCAPC 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 VCAPC any additional information identified as being needed to process the application.

B.16 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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

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

B.17 Source Modification Requirement

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

B.18 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, and VCAPC or an authorized representative to perform the following:

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

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

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

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

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

B.19 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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

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

B.20 Annual Fee Payment [326 IAC 2-1.1-7]

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

B.21 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Permit Revocation [326 IAC 2-1.1-9]

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

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

C.2 Opacity [326 IAC 5-1]

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 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.5 Fugitive Dust Emissions [326 IAC 6-4]

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

C.6 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.7 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

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

- no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ and VCAPC of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and VCAPC not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and VCAPC 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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

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

C.11 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.12 Instrument Specifications [326 IAC 2-1.1-11]

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

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

- (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.15 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or VCAPC makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or VCAPC 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.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and VCAPC on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on

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

- (e) 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 VCAPC. The general public may request this information from the IDEM, OAQ and VCAPC under 326 IAC 17.1.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

One (1) 10 MMBtu/hr rotary dryer with the ability to burn both natural gas and saw dust, identified as dryer, approved for construction in 2007, with a maximum capacity of fourteen (14) tons per hour, using a cyclone for product recovery, and exhausting to stack Dryer-1.

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

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

D.1.1 Particulate [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), the Permittee shall not allow or permit the discharge into the atmosphere any gases containing a particulate matter content greater than 0.03 grain per dry standard cubic foot.

D.1.2 Volatile Organic Compounds (VOC) Limit [326 IAC 8-1-6]

- (a) The rotary dryer shall not operate more than a combined total of 6,475 hours per 12 consecutive month period with compliance determined at the end of each month.
- (b) The VOC emissions from the rotary dryer stack (Dryer-1), shall not exceed 7.462 pounds per hour.

Compliance with these limits shall limit VOC emissions to less than 25 tons per year, rendering 326 IAC 8-1-6, VOC General Reduction Requirements, not applicable.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.4 Particulate Control [326 IAC 2-7-6(6)]

- (a) In order to comply with Condition D.1.1, the cyclone, for particulate control shall be in operation and control emissions from the rotary dryer at all times that the applicable equipment is in operation.

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) Within 180 days of startup, in order to demonstrate compliance with Conditions D.1.1, the Permittee shall perform PM and PM₁₀ testing for the cyclone exhaust utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM₁₀ includes filterable and condensable PM₁₀. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) Within 180 days of startup, in order to demonstrate compliance with Condition D.1.2(b), the Permittee shall perform VOC testing for the cyclone stack utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.1.6 Visible Emissions Notations

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

D.1.7 Cyclone Failure Detection

- (a) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.
- (b) For a cyclone 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 emissions unit.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2(a), the Permittee shall maintain records of the hours of operation of the rotary dryer each month. These records shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.2.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of daily visible emission notations of the rotary dryer and rotary cooler 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) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2(a) 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 an "authorized individual" as defined by 326 IAC 2-1.1-1.

**Indiana Department of Environmental Management
Office of Air Quality
Compliance Data Section
And
Vigo County Air Pollution Control
Quarterly Report**

Source Name: Custom Trading & Blending, Inc.
Source Address: 9766 S. Carlisle Street, Terre Haute, Indiana 47802
Mailing Address: 9766 S. Carlisle St., Terre Haute, Indiana 47802
MSOP Permit No.: M167-24583-00133
Source: Rotary Dryer
Pollutant: Hours of Operation
Limit: 6,475 hours per 12 consecutive month period, with compliance determined at the end of each month.

Year: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
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 BRANCH
and
VIGO COUNTY AIR POLLUTION CONTROL**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Custom Trading & Blending, Inc.
Address:	9766 S. Carlisle Street
City:	Terre Haute, Indiana 47802
Phone #:	(812) 299-0233
MSOP #:	M167-24583-00133

I hereby certify that Custom Trading & Blending, Inc. is : still in operation.
 no longer in operation.
I hereby certify that Custom Trading & Blending, Inc. is : in compliance with the requirements of MSOP M167-24583-00133.
 not in compliance with the requirements of MSOP M167-24583-00133.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
And
Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

Custom Trading & Blending, Inc.
9766 S. Carlisle Street
Terre Haute, Indiana 47802

Affidavit of Construction

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____
(Company Name)
4. I hereby certify that Custom Trading & Blending, Inc. 9766 S. Carlisle Street, Terre Haute, Indiana 47802, completed construction of the corn flour milling facility on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M167-24583-00133, Plant ID No. _____ issued on _____.

Further Affiant said not.

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

Signature _____

Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

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

My Commission expires: _____.

Signature _____

Name (typed or printed) _____

**Indiana Department of Environmental Management
Office of Air Quality
and
Vigo County Air Pollution Control**

**Addendum to the New Source Review and
Minor Source Operating Permit**

Source Name:	Custom Trading & Blending, Inc.
Source Location:	9766 S. Carlisle Street, Terre Haute, Indiana 47802
County:	Vigo
SIC Code:	2048
Permit No.:	M167-24583-00133
Permit Reviewer:	Rob Harmon

On July 12, 2007, the Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC) had a notice published in the Terre Haute Tribune Star, Terre Haute Indiana, stating that Custom Trading & Blending, Inc. had applied for a New Source Review and Minor Source Operating Permit to construct and operate an animal feed production plant. The notice also stated that OAQ and VCAPC 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 July 23, 2007, ERM, on behalf of Custom Trading & Blending, Inc., submitted comments on the proposed New Source Review and Minor Source Operating Permit. The summary of the comments is as follows:

Comment 1:

The comment requested the deletion of Condition D.1.5, Testing Requirements. This comment was based on the potential emission levels, as determined using stack testing data from a different company with a similar process. Additionally, they requested the removal of the once every 5 years requirement if it was still determined that stack testing was necessary.

Response to Comment 1:

The testing requirements were included because there was no established EPA emission factor for this type of operation. The use of an alternate emission factor, including one developed from testing at a different company with similar equipment, requires testing to verify its accuracy. At this time there is not enough data to evaluate the periodic portion of the testing requirements. Once the testing has actually been performed this can better be evaluated, either as a permit modification or as part of the permit renewal process. Therefore, no change was made in the testing requirements.

Comment 2:

The comment requested the deletion of Condition D.1.6, Visible Emission Notations. This request was based on the low level of after control emissions from the cyclone exhaust.

Response to Comment 2:

IDEM and VCAPC feel there is a need for some kind of monitoring of the cyclone to verify it is being operated properly since its operation is necessary to achieve compliance with the applicable PM standard. Additionally, this type of condition is already in place for the other animal feed manufacturing plant in Vigo County. No change was made as a result of this comment

Comment 3:

The comment requested the recordkeeping provision relating to the Visible Emission Notations also be removed.

Response to Comment 3:

Since the Visible Emission Notations are still required, the recordkeeping is appropriate. No change was made as a result of this comment.

Comment 4:

The comment described a change in the shape of the stack. The application had specified a 36" diameter circular stack. However, they now intend to install a rectangular stack that is 32" by 36". The comment requested this information be updated in the Stack Summary table in the TSD.

Response to Comment 4:

No change will be made to the original TSD. The OAQ prefers that the TSD reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the 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. The design change in the exhaust stack is duly noted.

**Indiana Department of Environmental Management
Office of Air Quality
And
Vigo County Air Pollution Control**

Technical Support Document (TSD) for a New Source Review
and Minor Source Operating Permit

Source Background and Description

Source Name:	Custom Trading & Blending, Inc.
Source Location:	9766 S. Carlisle Street, Terre Haute, Indiana 47802
County:	Vigo
SIC Code:	2048 (311119 NAICS)
Permit No.:	M167-24583-00133
Permit Reviewer:	Rob Harmon

Vigo County Air Pollution Control (VCAPC) has reviewed an application from Custom Trading & Blending, Inc. relating to the construction and operation of a rotary dryer at their existing animal feed production plant. After reviewing the application, a Minor Source Operating Permit will be issued. The animal feed production plant will consist of the following emission units and pollution control devices:

New Emission Units and Pollution Control Equipment

The source consists of the following new emission units and pollution control devices.

- (a) One (1) 10 MMBtu/hr rotary dryer with the ability to burn both natural gas and saw dust, identified as dryer, approved for construction in 2007, with a maximum capacity of fourteen (14) tons per hour, using a cyclone for product recovery, and exhausting to stack Dryer-1.

History

On April 10, 2007, Custom Trading & Blending, Inc. submitted an application to the OAQ and VCAPC requesting to construct and operate a new rotary dryer at their existing animal feed production plant. Based on the plant's potential emissions, a Minor Source Operating Permit (MSOP) will be issued.

Existing Approvals

No prior approvals have been issued to this source.

Enforcement Issue

No enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
Dryer-1	Animal feed production rotary dryer	50	3	18,000	150

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 - 7).

County Attainment Status

The source is located in Vigo County.

Pollutant	Status
PM ₁₀	Attainment
PM _{2.5}	Attainment
SO ₂	Maintenance Attainment
NOx	Attainment
8-hour Ozone	Maintenance Attainment
CO	Attainment
Lead	Attainment

- (a) Vigo County has been classified as attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and nitrogen oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Vigo 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.
- (c) Vigo County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard.
- (e) 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.
- (f) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 fugitive emissions are not counted toward the determination of PSD applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	61.67
PM-10	59.92
SO ₂	1.10
VOC	33.43
CO	26.28
NO _x	21.46

HAPs	tons/year
Acrolein	0.175
Benzene	0.184
Dichlorobenzene	5.26e-5
Formaldehyde	0.193
Hexane	0.0788
Hydrogen Chloride	0.832
Styrene	0.0832
Toluene	1.49e-4
Lead	2.10e-3
Cadmium	4.82e-5
Chromium	6.13e-5
Manganese	0.0701
Nickle	1.45e-3
Arsenic	9.64e-4
Barium	9.64e-4
Total	1.622

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this MSOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential to Emit (tons/year)							Combined HAP
	PM	PM10	SO ₂	VOC	CO	NO _x	HCI (Highest HAP)	
Dryer	7.52	7.26	1.10	24.90	26.28	21.46	0.832	1.622
Total	7.52	7.26	1.10	24.90	26.28	21.46	0.832	1.622
Major Source Threshold	250	250	250	250	250	250	10	25

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred-fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are not counted toward the determination of PSD applicability.

Federal Rule Applicability

The following federal rules are applicable to the source:

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 20, 40 CFR Part 61, and 40 CFR Part 63) included in the permit for this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

PSD applicability is discussed under the Potential to Emit After Issuance section.

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

Custom Trading & Blending, Inc. 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 2-6 (Emission Reporting)

This source is located in Vigo County and the potential to emit of all criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (c) This source is not located in the area of Vigo County referenced in 326 IAC 5-1-1(c)(8).

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), 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.

State Rule Applicability – Individual Facilities

326 IAC 6.5-1-2 (Particulate emission limitation)

Even though Vigo County is currently not a nonattainment area for particulate matter, it is still a listed county under 326 IAC 6.5-1-7. As such, the general nonattainment area provisions under 326 IAC 6.5-1-2 are still applicable.

Pursuant to 326 IAC 6.5-1-2(a), the Permittee shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot. The rotary dryer is subject to this limitation.

The cyclone shall be in operation at all times the rotary dryer is in operation, in order to comply with this limit.

326 IAC 8-1-6 (VOC General Reduction Requirements)

Pursuant to 326 IAC 8-1-6 new sources or facilities constructed after January 1, 1980 with potential emissions of VOC greater than 25 tons per year and not otherwise limited by Article 8 shall install BACT control. This permit will include a limit on the hours of operation per 12 consecutive months of 6,475 hours and a limit on the pounds of VOC emitted per hour of 7.462 pound per hour. These limitations reduce the potential to emit of VOC from the rotary dryer to less than twenty five (25) tons per year, thus rendering the requirements of 326 IAC 8-1-6 not applicable.

Recommendation

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

An application for the purposes of this review was received on April 11, 2007.

Conclusion

The operation of this animal feed production plant shall be subject to the conditions of the attached MSOP No. M167-24583-00133.

Custom Trading & Blending, Inc.
 9766 S. Carlisle Street, Terre Haute, Indiana 47802
 Minor Source Operating Permit (MSOP)
 Permit Number: M167-24583-00133
 Plant ID: 167-00133
 Application Received: April 11, 2007
 Permit Reviewer: Rob Harmon

Natural Gas Combustion (less than 100 MMBTU per hour each)

Heat Input Capacity MMBtu/hr **10.0** Potential Throughput MMBtu/yr 87.6 Cyclone Control Eff. 85.0%

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 ** see below	5.5	84.0
Potential Emission in tons/yr	0.08	0.33	0.03	4.38	0.24	3.68
After Control Pot. Emission in tons/yr	0.01	0.05	0.03	4.38	0.24	3.68

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

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

See page 2 for HAPs emissions calculations.

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 Permit Reviewer: Rob Harmon

Natural Gas Combustion (less than 100 MMBTU per hour each)

		HAPs - Organics			
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.20E-05	5.26E-05	3.29E-03	7.88E-02	1.49E-04
		HAPs - Metals			
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.19E-05	4.82E-05	6.13E-05	1.66E-05	9.20E-05

Methodology is the same as page 1.

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

Appendix A: Emissions Calculations

Custom Trading & Blending, Inc.
 9766 S. Carlisle Street, Terre Haute, Indiana 47802
 Minor Source Operating Permit (MSOP)
 Permit Number: M167-24583-00133
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 Permit Reviewer: Rob Harmon

Dry wood combustion (used for sawdust)

Heat Input Capacity MMBTU/hr	Potential Throughput MMBTU/yr	Cyclone Control Eff.
10.0	87600.0	85.0%

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	0.4	0.4	0.025	0.49 **see below	0.017	0.6
Potential Emission in tons/yr	17.52	15.77	1.10	21.46	0.74	26.28
After Control Pot. Emission in tons/yr	2.63	2.37	1.10	21.46	0.74	26.28

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

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu

Potential Throughput (MMBTU/yr) = Heat Input Capacity (MMBTU/hr) x 8,760 hrs/yr
 Emission Factors are from AP 42, Chapter 1.6, Tables 1.6-1, 1.6-2, 1.6-3
 (SUPPLEMENT D 3/98)
 Emission (tons/yr) = Throughput (MMBTU/yr) x Emission Factor (lb/MMBTU)/2,000 lb/ton
 See page 4 for HAPs emissions calculations.

Custom Trading & Blending, Inc.
 9766 S. Carlisle Street, Terre Haute, Indiana 47802
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Dry wood combustion

HAPs - Non-Metallic					
	Acrolein	Benzene	Formaldehyde	Hydrogen Chloride	Styrene
Emission Factor in lb/MMcf	4.0E-03	4.2E-03	4.4E-03	1.9E-02	1.9E-03
Potential Emission in tons/yr	1.75E-01	1.84E-01	1.93E-01	8.32E-01	8.32E-02

HAPs - Metals					
	Lead	Arsenic	Barium	Manganese	Nickel
Emission Factor in lb/MMcf	4.8E-05	2.2E-05	2.2E-05	1.6E-03	3.3E-05
Potential Emission in tons/yr	2.10E-03	9.64E-04	9.64E-04	7.01E-02	1.45E-03

Methodology is the same as page 3.

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

Custom Trading & Blending, Inc.
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Combustion - Determine Worst Case

Before Control

	Pollutant						
	PM	PM10	SO2	NOx	VOC	CO	CO
Natural Gas Combustion	0.08	0.33	0.03	4.38	0.24	3.68	3.68
Sawdust (Dry Wood) Combustion	17.52	15.77	1.10	21.46	0.74	26.28	26.28
Worst Case (Combustion)	17.52	15.77	1.10	21.46	0.74	26.28	26.28

After Control

	Pollutant						
	PM	PM10	SO2	NOx	VOC	CO	CO
Natural Gas Combustion	0.01	0.05	0.03	4.38	0.24	3.68	3.68
Sawdust (Dry Wood) Combustion	2.63	2.37	1.10	21.46	0.74	26.28	26.28
Worst Case (Combustion)	2.63	2.37	1.10	21.46	0.74	26.28	26.28

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Dryer Emissions

Maximum Throughput (ton/hr)	Cyclone Control Eff.	Voluntary Hours of Operation Limit
14	85.0% (PM control only)	6475

Particulate Matter

VOC

0.72 Emission Factor (lb/ton)	0.533 Emission Factor (lb/ton)
122640 Maximum tons processed (ton/yr)	122640 Maximum tons processed (ton/yr)
44.15 PM emitted before control (ton/year)	32.68 VOC emitted before control (ton/year)
6.62 PM emitted after control (ton/year)	32.68 VOC emitted after control (ton/year)
4.90 PM emitted after control and limit (ton/year)	24.16 VOC emitted after control and limit (ton/year)

Methodology

Both PM and VOC emission factors from testing at a similar company (Reconserve, Permit ID 167-13862-00086) [Testing to verify will be required]
 Maximum tons processed = Maximum throughput (ton/hr) * 8760 hr/yr
 Emissions before control (ton/yr) = Maximum tons processed (ton/yr) * Emission Factor (lb/ton) / 2000 lb/ton
 Emissions after control (ton/yr) = Emissions before control (ton/yr) * (1-Control Efficiency)
 Emissions after control and limit (ton/yr) = Emissions after control (ton/yr) * Limited Hours / 8760 hours/yr
 Since no PM10 data, PM assumed to be equal to PM10

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Overall Source Emission Summary

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Worst Case Combustion	17.52	15.77	1.10	21.46	0.74	26.28
Dryer Emissions	44.15	44.15			32.68	
Total	61.67	59.92	1.10	21.46	33.43	26.28

After Control and Limit

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Worst Case Combustion	2.63	2.37	1.10	21.46	0.74	26.28
Dryer Emissions	4.90	4.90			24.16	
Total	7.52	7.26	1.10	21.46	24.90	26.28