



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: December 18, 2007  
RE: Griffin Industries, Inc. / 055-24866-00008  
FROM: Matthew Stuckey, Deputy Branch Chief  
Permits Branch  
Office of Air Quality

### **Notice of Decision: Approval – Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 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, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) 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.

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 impracticable 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.



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Indianapolis, Indiana 46204-2251  
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[www.IN.gov/idem](http://www.IN.gov/idem)

Mr. Rick Elrod  
Griffin Industries, Inc.  
4221 Alexandria Pike  
Cold Spring, KY 41076-1897

December 18, 2007

Re: 055-24866-00008  
First Significant Permit Modification to  
Part 70 No.: T055-6360-00008

Dear Mr. Elrod:

Griffin Industries, Inc. was issued a Part 70 Operating Permit on October 4, 2000 for a stationary animal and agricultural byproducts rendering operation. A letter requesting changes to this permit was received on June 5, 2007. Pursuant to the provisions of 326 IAC 2-7-12 a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the inclusion of a federally enforceable source-wide emission limitation to limit the potential to emit of individual hazardous air pollutants (HAP) to less than ten (10) tons per year and combined HAP to less than twenty-five (25) tons per year.

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

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Tracy DeHaven Parham, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7901 to speak directly to Ms. Parham. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027, and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Matthew Stuckey, Deputy Branch Chief  
Office of Air Quality  
Permits Branch

ERG/TDP  
Attachments

cc: File - Greene County  
U.S. EPA, Region V  
Greene County Health Department  
Air Compliance Section Inspector  
Compliance Data Section  
Administrative and Development  
Billing, Licensing and Training Section



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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Griffin Industries  
Route 1 Box 112  
Newberry, Indiana 47449**

(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.

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.: T 055-6063-00008	
Original signed by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: October 4, 2000

Administrative Amendment No. 055-13832-00008, issued on March 15, 2001.

Significant Permit Modification No. 055-24866-00008 Pages Affected: Entire Permit	
Issued by:  Matthey Stuckey, Deputy Branch Chief Office of Air Quality Permits Branch	Issuance Date: December 18, 2007

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## SECTION A

## SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary animal and agricultural byproducts rendering operation.

Source Address: Route 1 Box 112, Newberry, IN 47449  
Mailing Address: Route 1 Box 112, Newberry, IN 47449  
Phone Number: 606-781-2010  
SIC Code: 2077  
County Location: Greene  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules  
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)]

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

- (a) One (1) fluidized, coal-fired boiler, identified as 01, constructed in 1981, with a heat input capacity of 50 million Btu per hour, using natural gas as a backup fuel, dry limestone injection for sulfur dioxide (SO<sub>2</sub>) control, a cyclone centrifugal separator and baghouse for particulate matter control, and exhausting to stack A;
- (b) One (1) traveling grate, coal-fired boiler, identified as 02, constructed in 1989, with a heat input capacity of 50 million Btu per hour, using a cyclone centrifugal separator for particulate matter control, and exhausting to stack B;
- (c) One (1) natural gas-fired dryer, identified as 04, constructed in 1994, with a heat input capacity of 20 million Btu per hour, using No. 2 fuel oil as a backup fuel, a cyclone centrifugal separator and a wet scrubber for particulate matter control, and exhausting to stack D;
- (d) One (1) natural gas-fired boiler, identified as 03, constructed in 1989, with a heat input capacity of 33.746 million Btu per hour, and exhausting to stack C; and
- (e) Material storage and handling facilities including:
  - (1) seven (7) enclosed tanks totalling 420 tons of capacity, used for storing tallow/grease, with enclosed piping for material handling,
  - (2) three (3) 250 ton capacity enclosed silos, used for storing meat meal, feather meal, and poultry meal, with three (3) screw conveyors for material handling, and
  - (3) one (1) 30 ton capacity enclosed silo, used for storing blood meal, with one (1) screw conveyor for material handling.

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

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6:
  - (1) Three (3) cold cleaners, each with 22 gallon reservoirs.

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

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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 Permit No Defense [IC 13]

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- (a) 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 Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

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

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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.3 Permit Term [326 IAC 2-7-5(2)]

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This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### B.4 Enforceability [326 IAC 2-7-7(a)]

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

### B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

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

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

### B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

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- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

- (b) The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must include a claim of confidentiality in

accordance with 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U.S. EPA, then the Permittee must furnish such records directly to the U.S. EPA. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must include such a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) 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.

B.10 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 under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The 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 compliance 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, 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.12 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]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) 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;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission

limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

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

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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 2-7-4(c)(10) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) 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, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) 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.
- (e) 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.
- (f) 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).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 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 Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 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]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(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 at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. 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).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due. [326 IAC 2-5-3]
  - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in

effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with 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  
Indianapolis, Indiana 46204  
  
Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement the 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.20 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)(D)(i) 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.21 Operational Flexibility [326 IAC 2-7-20]

- (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 approval required by 326 IAC 2-1.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, 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) and the following additional conditions:

(1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

(2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

(iii) Any change in emissions; and

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

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).

**B.22 Construction Permit Requirement [326 IAC 2] [326 IAC 2-7-10.5]**

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A modification, construction, or reconstruction shall be approved as if required by and in accordance with the applicable provisions of 326 IAC 2 and 326 IAC 2-7-10.5.

**B.23 Inspection and Entry [326 IAC 2-7-6(2)]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to

assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

B.24 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  
Indianapolis, Indiana 46204

The application 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).

- (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.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year. In the event of a failure by IDEM to send a bill, a miscalculation of the fee amount by the Permittee shall not be the basis of an enforcement action. The amount of the final fee owed must be determined in accordance with 326 IAC 2-7-19(e) regardless of whether the Permittee paid with or without the bill.
- (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 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.



## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

The total source potential to emit for SO<sub>2</sub> is limited to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

#### C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

#### C.3 Opacity [326 IAC 5-1]

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

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

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

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

#### C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

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

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

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

#### C.7 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

#### C.8 Stack Height [326 IAC 1-7]

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

**C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

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- (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

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 emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) **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 that the inspector be accredited is federally enforceable.

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

**C.10 Performance Testing [326 IAC 3-6]**

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- (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

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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

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

##### **C.11 Compliance Schedule [326 IAC 2-7-6(3)]**

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- (a) With its permit application, the Permittee:
- (1) Has certified that all facilities at this source are in compliance with all applicable requirements; and
  - (2) Has submitted a statement that the Permittee will continue to comply with such requirements.
- (b) The Permittee will comply with such applicable requirements that become effective during the term of this permit.

##### **C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Compliance with applicable requirements shall be documented as required by this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any newly required monitoring, no more than ninety (90) days after receipt of this permit or by a later date specified by an applicable requirement. If a previous or existing approval or applicable requirement mandates compliance monitoring, the source will continue or initiate such monitoring. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule for newly required monitoring 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

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).

**C.13 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

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- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.14 Monitoring Methods [326 IAC 3]**

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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, or other approved methods as specified in this permit.

**C.15 Pressure Gauge Specifications**

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Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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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

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

The ERP does not 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, 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, 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.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]

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- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.

- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.18 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 corrective actions. The Permittee shall submit a description of these corrective 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 corrective actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law to resolve noncompliant stack tests.

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

**C.19 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) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission 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
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

**C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available within a reasonable time. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in

accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11]**

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- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The 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
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) 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.

**Stratospheric Ozone Protection**

**C.23 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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) fluidized, coal-fired boiler, identified as 01, constructed in 1981, with a heat input capacity of 50 million Btu per hour, using natural gas as a backup fuel, dry limestone injection for sulfur dioxide (SO<sub>2</sub>) control, a cyclone centrifugal separator and baghouse for particulate matter control, and exhausting to stack A;
- (b) One (1) traveling grate, coal-fired boiler, identified as 02, constructed in 1989, with a heat input capacity of 50 million Btu per hour, using a cyclone centrifugal separator for particulate matter control, and exhausting to stack B;
- (c) One (1) natural gas-fired dryer, identified as 04, constructed in 1994, with a heat input capacity of 20 million Btu per hour, using No. 2 fuel oil as a backup fuel, a cyclone centrifugal separator and a wet scrubber for particulate matter control, and exhausting to stack D;
- (d) One (1) natural gas-fired boiler, identified as 03, constructed in 1989, with a heat input capacity of 33.746 million Btu per hour, and exhausting to stack C.

(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 Hazardous Air Pollutants (HAP)

- (a) In order to render the requirements of the Clean Air Act, Section 112(j) not applicable: hydrogen chloride (HCl) emissions from boilers 01 and 02 shall not exceed 9.9 tons total per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) Combined with the HCl, individual HAP, and combined HAP emissions from other units, the individual HAP emissions from the entire source are limited to less than ten (10) tons per year, and combined HAP emissions are limited to less than twenty-five (25) tons per year. Therefore, the requirements of the Clean Air Act, Section 112(j) are not applicable.

#### D.1.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations) the SO<sub>2</sub> emissions when combusting coal from boiler 01 and boiler 02 shall not exceed six (6.0) pounds per MMBtu heat input. The SO<sub>2</sub> emissions when combusting No. 2 fuel oil from dryer 04 shall not exceed five-tenths (0.5) pounds per MMBtu heat input.

#### D.1.3 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

Pursuant to OP 28-12-93-0051:

- (a) The sulfur dioxide (SO<sub>2</sub>) emissions from boiler 02 shall be limited to 20.5 tons per month. For a coal usage rate of 750 tons per month, this limit equates to 2.4 pounds of SO<sub>2</sub> per million Btu of heat input.
- (b) Dryer 04 shall be limited to 1,083,333 gallons of No.2 distillate fuel oil per 12 month period, rolled on a monthly basis.
- (c) The total source potential to emit for SO<sub>2</sub> and for PM is limited to less than 250 tons per year.

These limitations shall render the PSD rules under 326 IAC 2-2 and 40 CFR 52.21 not applicable.

**D.1.4 Particulate Matter (PM) [326 IAC 6-2-3]**

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Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from boiler 01 shall be limited to 0.60 pounds per million British thermal unit.

**D.1.5 Particulate Matter (PM) [326 IAC 6-2-4]**

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Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from boiler 02 and boiler 03 each shall be limited to 0.305 lb/mmBtu. These limits were established by the following equation:

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

where Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and  
Q = total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

**D.1.6 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

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Pursuant to 326 IAC 6-3-2(c), the PM from dryer 04 shall not exceed 37.9 pounds per hour when operating at a process weight rate of 55,284 pounds per hour.

Interpolation of the data for the process weight rate from one hundred (100) pounds per hour up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

**D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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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.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the SO<sub>2</sub> and PM limits specified in Conditions D.1.1, D.1.2, D.1.3, D.1.4, and D.1.5 shall be determined by performance tests conducted in accordance with Section C - Performance Testing.

**D.1.9 HAP Emissions**

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Compliance with the HAP limits in Condition D.1.1 shall be demonstrated using the following equations.

- (a) Using the measured chlorine concentration (ppm), the Permittee shall calculate the 90th percentile confidence level pollutant concentration for each boiler and then use this concentration to determine the HCl emissions. This concentration value is calculated as follows for each boiler:

$$P_{90} = \text{mean} + (SD * t)$$

Where

P<sub>90</sub> = 90th percentile confidence level pollutant concentration, in ppm

Mean = Arithmetic average of the fuel pollutant concentration in the fuel samples, in ppm

SD = Standard deviation of the pollutant concentration in the fuel samples, in ppm

$t$  =  $t$  distribution critical value for 90th percentile (0.1) probability for the appropriate degrees of freedom (number of samples minus one) as obtained from a Distribution Critical Value Table.

- (b) The Hydrogen Chloride emissions shall be calculated according to the following equation:

$$E_{\text{HCl}} = (1.028 * P_{90} * Q_{\text{Coal}}) / 10^6 \dots\dots \text{Equation (1)}$$

Where

- $E_{\text{HCl}}$  = Emissions of Hydrogen Chloride in tons per year  
1.028 = Molecular weight ratio of Hydrogen Chloride to Chlorine  
 $P_{90}$  = Chlorine content in coal, dry basis (ppm), 90<sup>th</sup> percentile confidence level as calculated in Condition D.1.9(a)  
 $Q_{\text{Coal}}$  = Coal Consumption in tons per year

To demonstrate compliance with the above emission limit, the Permittee shall calculate HCl emissions based on the type of coal and coal consumption.

Compliance with this HAP limit, in conjunction with the potential HAP emissions from the Boiler 03 and Dryer 04, will limit the source wide single HAP and total HAP emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of the Clean Air Act Section 112(j) do not apply to this source.

#### D.1.10 Hydrogen Chloride Emissions and Chlorine Content

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- (a) The coal consumption ( $Q_{\text{Coal}}$ ) in Condition D.1.9 shall be determined each month based on the actual coal burned in Boilers 01 and 02.
- (b) Coal sampling for determining the Cl concentration identified in Condition D.1.9 (b) shall be performed at least once per month and whenever new coal (including either a different type of coal or coal obtained from a different supplier) is bunkered or burned, using one of the procedures specified in Condition D.1.10(c) or as provided by the fuel supplier in accordance with Condition D.1.10(d).
- (c) The samples shall be analyzed for hydrogen chloride and moisture using one of the following methods:
- (1) ASTM D6721-01 Standard Test Method for Determination of Chlorine in Coal by Oxidative Hydrolysis Microcoulometry.
  - (2) ASTM D3173-03 Standard Test Method for Moisture in the Analysis Sample of Coal and Coke.
  - (3) ASTM D3302-02a Standard Test Method for Total Moisture in Coal.
- (d) The fuel sampling and analysis requirement in this section may also be conducted by the fuel supplier using one of the methods in D.1.10(c).

#### D.1.11 Sulfur Dioxide Emissions and Sulfur Content

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Compliance when using fuel oil No. 2 in dryer 04 shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 7-1.1-2 (Sulfur Dioxide Limitations), sulfur dioxide emissions from the combustion of distillate #2 fuel oil shall be limited to 0.5 pounds per million British thermal units of heat input. For the purpose of determining compliance, this limitation shall be considered equivalent to a sulfur content of five tenths of a percent (0.5 %) by weight or less in the distillate fuel oil. Compliance with the limit contained in Condition D.1.1 may be determined by:

- (1) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
- (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
  - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
  - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the 20 million British thermal units per hour (mmBtu/hr) dryer 04, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

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

D.1.12 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6] [326 IAC 7-1.1] [326 IAC 7-2-1]

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The Permittee shall demonstrate compliance of boiler 01 with Condition D.1.1 and boiler 02 with Condition D.1.2 utilizing one of the following options:

- (a) Providing vendor analysis of coal delivered, if accompanied by a certification from the fuel supplier, as described under 40 CFR 60.48c(f)(3). The certification shall include:
  - (1) The name of the coal supplier; and
  - (2) The location of the coal when the sample was collected for analysis to determine the properties of the coal, specifically including whether the coal was sampled as delivered to the affected facility or whether the coal was collected from coal in storage at the mine, at a coal preparation plant, at a coal supplier's facility, or at another location. The certification shall include the name of the coal mine (and coal seam), coal storage facility, or coal preparation plant (where the sample was collected); and
  - (3) The results of the analysis of the coal from which the shipment came (or of the shipment itself) including the sulfur content, moisture content, ash content, and heat content; and
  - (4) The methods used to determine the properties of the coal; or
- (b) Sampling and analyzing the coal by using one of the following procedures:
  - (1) Minimum Coal Sampling Requirements and Analysis Methods:
    - (A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;
    - (B) Coal shall be sampled at least one (1) time per day;
    - (C) Minimum sample size shall be five hundred (500) grams;
    - (D) Samples shall be composited and analyzed at the end of each calendar quarter;

- (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or
- (2) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or
- (c) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]

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

#### D.1.13 Particulate Matter (PM)

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The cyclone centrifugal separators associated with boilers 01, 02, and dryer 04, the baghouse associated with boiler 01, the dry limestone injection system associated with boiler 01, and the wet scrubber for PM control associated with dryer 04 shall be in operation at all times when boilers, 01, 02, and dryer 04 are in operation and exhausting to the outside atmosphere.

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

#### D.1.14 Visible Emissions Notations

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- (a) Daily visible emission notations of the boilers and dryers stack exhaust shall be performed during normal daylight operations when burning coal or No. 2 fuel oil and when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.1.15 Parametric Monitoring

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- (a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the boiler 01, at least once weekly when boiler 01 is in operation and venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 2.0 and 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.
- (c) The coal delivery system which supplies fuel to the boiler 01 is electrically interlocked with a limestone delivery system. When coal is fed into the boiler (on a demand-feed basis), the limestone delivery system is automatically activated to feed a preselected ratio. The electrical interlock of this system is set so the delivery of coal cannot occur

without delivery of limestone. The Permittee shall perform monthly trip checks of the switches monitoring the coal delivery/limestone delivery interlock. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the interlock is not operating correctly.

#### D.1.16 Broken or Failed Bag Detection

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In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. 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 single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### D.1.17 Control Device Inspections [326 IAC 2-7-1(21)(G)(xxix)]

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An external inspection shall be performed each week of all the cyclones controlling the boilers 01 and 02 when venting to the atmosphere. Inspections are not required when a cyclone is venting to the indoors.

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

#### D.1.18 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.2 and D.1.8, the Permittee shall maintain records for dryer 04 in accordance with (1) through (3) below.
  - (1) Calendar dates covered in the compliance determination period;
  - (2) Actual No. 2 distillate fuel oil usage since last compliance determination period;
  - (3) If the fuel supplier certification is used to demonstrate compliance the following shall be maintained:
    - (A) Fuel supplier certifications;
    - (B) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and
    - (C) The name of the fuel supplier.

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

- (b) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records for boiler 01 and boiler 02 in accordance with (1) through (7) below. Records

maintained for (1) through (4) and (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the emission limits established in D.1.1. Records maintained for (6) shall be taken daily and shall be complete and sufficient to establish compliance with the emission limits established in D.1.1.

- (1) Calendar dates covered in the compliance determination period; and
  - (2) Actual coal usage since last compliance determination period; and
  - (3) Average sulfur content, and heat content of coal; and
  - (4) Monthly average sulfur dioxide emission rates; and
  - (5) Vendor analysis of coal and coal supplier certification, if the vendor analysis is used to determine compliance.
  - (6) The limestone/coal feed ratio of the dry limestone injection system.
  - (7) A log of the dry limestone injection/coal delivery interlock monthly trip checks.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain records in accordance with (1) and (4) below. Records maintained for (1) and (4) shall be sufficient to establish a 12 consecutive month annual emissions rate and shall be complete and sufficient to demonstrate compliance with the HAP limits establish in Condition D.1.1 and D.1.9.
- (1) Actual coal usage since last compliance determination period and records of calculations per Condition D.1.9.
  - (2) Chlorine content and moisture content in the coal.
  - (3) Records of coal sample performed in accordance with Condition D.1.10.
  - (4) Records of emission rate calculations specified in Condition D.1.9.
- (d) To document compliance with Condition D.1.14, the Permittee shall maintain records of daily visible emission notations of the boilers stack exhaust. 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 run that day).
- (e) Pursuant to 40 CFR 60.40c, the Permittee shall record and maintain records of the amounts of fuel combusted during each day for a period of two years following the date of such record for boiler 03.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.19 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, 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.
- (b) An annual certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than July 1 of each year for the boilers 01 and 03 and dryer 04.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

- (e) Material storage and handling facilities including:
- (1) seven (7) enclosed tanks totaling 420 tons of capacity, used for storing tallow/grease, with enclosed piping for material handling,
  - (2) three (3) 250 ton capacity enclosed silos, used for storing meat meal, feather meal, and poultry meal, with three (3) screw conveyors for material handling, and
  - (3) one (1) 30 ton capacity enclosed silo, used for storing blood meal, with one (1) screw conveyor for material handling.

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

Pursuant to 326 IAC 6-3 (Process Operations), the PM from the material storage and handling facilities shall not exceed 33.13 pounds per hour when operating at a process weight rate of 45,230 pounds per hour. The pound per hour emission rate was established as E in the following formula:

Interpolation of the data for the process weight rate from one hundred (100) pounds per hour up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

### Compliance Determination Requirements

#### D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by performance tests conducted in accordance with Section C - Performance Testing.

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

#### D.2.3 Monitoring

Monitoring of these facilities is not specifically required by this permit.

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

#### D.2.4 Record Keeping Requirements

There are no record keeping requirements specifically addressing these facilities.

#### D.2.5 Reporting Requirements

There are no reporting requirements specifically addressing these facilities.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6:

(1) Three (3) cold cleaners, each with 22 gallon reservoirs.

(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 Volatile Organic Compound (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of the cold cleaning facilities 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;
- (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.

### Compliance Determination Requirements

#### D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by performance tests conducted in accordance with Section C - Performance Testing.

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

#### D.3.3 Monitoring

Monitoring of these facilities is not specifically required by this permit.

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

#### D.3.4 Record Keeping Requirements

There are no record keeping requirements applicable to the cold cleaning facilities.

#### D.3.5 Reporting Requirements

There are no reporting requirements applicable to the cold cleaning facilities.

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Griffin Industries  
Source Address: Route 1 Box 112, Newberry, IN 47449  
Mailing Address: Route 1 Box 112, Newberry, IN 47449  
Part 70 Permit No.: T 055-6063-00008

**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)
- Other (specify)

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE DATA SECTION**  
**100 North Senate Avenue**  
**MC 61-53 IGCN 1003**  
**Indianapolis, Indiana 46204**  
**Phone: 317-233-5674**  
**Fax: 317-233-5967**

**PART 70 OPERATING PERMIT**  
**EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Griffin Industries  
Source Address: Route 1 Box 112, Newberry, IN 47449  
Mailing Address: Route 1 Box 112, Newberry, IN 47449  
Part 70 Permit No.: T 055-6063-00008

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2
<input type="checkbox"/> 1. This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>· The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</li><li>· The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16</li></ul>
<input type="checkbox"/> 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) <ul style="list-style-type: none"><li>· The Permittee must submit notice in writing within ten (10) calendar days</li></ul>

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
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: \_\_\_\_\_

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

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

Source Name: Griffin Industries  
Source Address: Route 1 Box 112, Newberry, IN 47449  
Mailing Address: Route 1 Box 112, Newberry, IN 47449  
Part 70 Permit No.: T 055-6063-00008

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

Report period

Beginning: \_\_\_\_\_

Ending: \_\_\_\_\_

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

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

Signature:

Printed Name:

Title/Position:

Date:

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION Part 70 Quarterly Report

Source Name: Griffin Industries  
 Source Address: Route 1 Box 112, Newberry, IN 47449  
 Mailing Address: Route 1 Box 112, Newberry, IN 47449  
 Part 70 Permit No.: T 055-6063-00008  
 Facility: Source-wide emissions  
 Parameter: SO<sub>2</sub> emissions  
 Limit: 250 tons per year

YEAR:

Month	Usage in tons of coal per month	% by weight Sulfur	lb SO <sub>2</sub> per mmBtu	SO <sub>2</sub> emissions (tons/month)	SO <sub>2</sub> emissions Previous 11 Months (tons)	SO <sub>2</sub> emissions 12 Month Total (tons)
Month	Usage in gallons of fuel oil per month	% by weight Sulfur	lb SO <sub>2</sub> per mmBtu	SO <sub>2</sub> emissions (tons/month)	SO <sub>2</sub> emissions Previous 11 Months (tons)	SO <sub>2</sub> emissions 12 Month Total (tons)
Total of SO <sub>2</sub> Emissions from coal and fuel oil combustion (should be ≤ 250 tons/year)						

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on:

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

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

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

Source Name: Griffin Industries  
Source Address: Route 1 Box 112, Newberry, IN 47449  
Mailing Address: Route 1 Box 112, Newberry, IN 47449  
Part 70 Permit No.: T 055-6063-00008

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. 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.

<b>Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)</b>	<b>Number of Deviations</b>	<b>Date of each Deviations</b>

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**Addendum to the Technical Support Document  
for Significant Permit Modification to a Part 70 Operating Permit**

**Source Background and Description**

Source Name:	Griffin Industries, Inc.
Source Location:	CR 400 West, Route 1 Box 112, Newberry, Indiana 47499-9729
County:	Greene
SIC Code:	2077
Operation Permit No.:	T055-6063-00008
Operation Permit Issuance Date:	October 4, 2000
Significant Permit Modification No.:	055-24866-00008
Permit Reviewer:	ERG/TDP

On July 27, 2007, the Office of Air Quality (OAQ) had a notice published in the Linton Daily Citizen, Linton, Indiana, stating that Griffin Industries, Inc. had applied for a Significant Permit Modification to a Part 70 Operating Permit to operate a stationary animal and agricultural byproducts rendering station with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On August 22, 2007, Griffin Industries, Inc., submitted comments on the proposed Significant Permit Modification. The summary of the comments is as follows. New language is shown in bold and deleted language is shown in strikeout. The Table of Contents has been updated as necessary.

**Comment 1:**

Regarding pages 4, 6, and 8 of 10 TSD and Page 27 of 40, Condition D.1.9(b) of the Permit, the calculation formula is included in the TSD and draft permit to estimate HCl emissions (tpy) based on chlorine (Cl) concentration derived from fuel analysis:

$$E_{HCl} = (1.028 * C_{Cl} * Q_{Coal})/10^6 \dots\dots \text{Equation (1)}$$

Where

$E_{HCl}$	=	Emissions of Hydrogen Chloride in tons per year
1.028	=	Molecular weight ratio of Hydrogen Chloride to Chlorine
$C_{Cl}$	=	Chlorine content in coal, dry basis (ppm)
$Q_{Coal}$	=	Coal Consumption in tons per year

The 90th percentile confidence level pollution concentration ( $P_{90}$ ) calculated in Condition D.1.9(a) should be used to estimate the HCl emission rate. Therefore,  $C_{Cl}$  in the above equation must be replaced with  $P_{90}$ . Please revise pages 4, 6, and 8 of the TSD and permit Condition D.1.9(b) on page 27 of the draft permit accordingly.

**Response to Comment 1:**

IDEM, OAQ agrees that Condition D.1.9(b) should reflect consistent terminology. Therefore, Condition D.1.9(b) has been updated as follows:

#### D.1.9 HAP Emissions

---

Compliance with the HAP limits in Condition D.1.1 shall be demonstrated using the following equations.

...

(b) The Hydrogen Chloride emissions shall be calculated according to the following equation:

$$E_{\text{HCl}} = (1.028 * C_{\text{Cl}}P_{90} * Q_{\text{Coal}})/10^6 \dots\dots \text{Equation (1)}$$

Where

- $E_{\text{HCl}}$  = Emissions of Hydrogen Chloride in tons per year
- 1.028 = Molecular weight ratio of Hydrogen Chloride to Chlorine
- $C_{\text{Cl}}P_{90}$  = Chlorine content in coal, dry basis (ppm), **90<sup>th</sup> percentile confidence level as calculated in Condition D.1.9(a)**
- $Q_{\text{Coal}}$  = Coal Consumption in tons per year

To demonstrate compliance with the above emission limit, the Permittee shall calculate HCl emissions based on the type of coal and coal consumption.

...

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document 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.

#### Comment 2:

Regarding page 27 of 40, Condition D.1.10(b) and pages 5 and 8 of 10 of the TSD: the permit conditions and compliance demonstration provisions in the permit application report were suggested based on guidance provided in the Boiler NESHAP (40 CFR 63, Subpart DDDDD) that is incorporated in 326 IAC 20-95. Even though the Boiler NESHAP was vacated by the U.S. Court of Appeals on July 30, 2007, Griffin Industries is proceeding with this permit action to demonstrate compliance with 326 IAC 20-95. The Boiler NESHAP specified a once per five year fuel sampling frequency as adequate means of demonstrating compliance with the emission limits. Therefore, Griffin believes that once per month fuel sampling (as required in Condition D.1.10(b)) is not required because the variability in Cl concentration in coal is accounted for by the standard deviation and t-distribution that is used to calculate the  $P_{90}$  value. Moreover, the Newberry plant assumes that all Cl present in coal is emitted to the atmosphere. This is a very conservative estimate due to the use of lime and baghouse controls in the fluidized bed boiler, and based on recent actual ash analysis performed at the Newberry Plant. The Newberry Plant will demonstrate compliance by performing monthly HCl emission calculations and keeping adequate records of coal usage and calculations performed.

Therefore, Griffin requests that Condition D.1.10(b) of the permit and pages 5 and 8 of the TSD be revised to include a once per permit term fuel sampling requirement, instead of a once per month requirement. Griffin also requests that all references to the Boiler MACT be deleted from permit documents.

Additionally, Condition D.1.10(b) states that coal sampling to measure "HCl" concentration shall be performed whenever "new coal" (including different type of coal from a different supplier) is bunkered or burned in the coal boilers. Coal sampling is conducted to measure Cl concentration and not HCl concentration, and HCl emissions are calculated using stoichiometric mass balance. Griffin requests that Condition D.1.10(b) and pages 5 and 8 of the TSD reflect that Cl concentration is measured.

## Response to Comment 2:

40 CFR 63, Subpart DDDDD was vacated by the U.S. Court of Appeals on July 30, 2007. Since the federal rule has been vacated, 326 IAC 20-95, which previously incorporated 40 CFR 63, Subpart DDDDD by reference, has also been vacated. According to Section 112(j) of the Clean Air Act, major sources of Hazardous Air Pollutants (HAPs) require a case-by-case Maximum Achievable Control Technology (MACT) determination when EPA fails to promulgate a scheduled MACT Standard by the regulatory deadline, unless the facility takes enforceable minor HAP limits. The Permittee has elected to proceed with the federally enforceable minor HAP limits, such that the requirements of the Clean Air Act, Section 112(j) do not apply. All references to 326 IAC 20-95 and 40 CFR 63, Subpart DDDDD have been removed from the permit.

Griffin Industries, Inc. complies with the minor HAP limits of this permit by fuel sampling and analysis. IDEM, OAQ requires a stricter coal sampling frequency to comply with minor HAP limits. This is consistent with similar facilities and current coal sampling requirements.

Therefore, the permit has been updated as follows:

### D.1.1 Hazardous Air Pollutants (HAP)

---

- (a) In order to render the requirements of ~~326 IAC 20-95-1 and 40 CFR 63, Subpart DDDDD~~ **the Clean Air Act, Section 112(j)** not applicable: hydrogen chloride (HCl) emissions from boilers 01 and 02 shall not exceed 9.9 tons total per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) Combined with the HCl, individual HAP, and combined HAP emissions from other units, the individual HAP emissions from the entire source are limited to less than ten (10) tons per year, and combined HAP emissions are limited to less than twenty-five (25) tons per year. Therefore, the requirements of ~~326 IAC 20-95-1 (NESHAP) and 40 CFR 63, Subpart DDDDD~~ **the Clean Air Act, Section 112(j)** are not applicable.

### D.1.9 HAP Emissions

---

...

Compliance with this HAP limit, in conjunction with the potential HAP emissions from the Boiler 03 and Dryer 04, will limit the source wide single HAP and total HAP emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of the ~~National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart DDDDD (Industrial, Commercial, and Institutional Boilers and Process Heaters) and 326 IAC 20-95~~ **Clean Air Act Section 112(j)** do not apply to this source.

### D.1.10 Hydrogen Chloride Emissions and Chlorine Content

---

- (a) The coal consumption ( $Q_{\text{Coal}}$ ) in Condition D.1.9 shall be determined each month based on the actual coal burned in Boilers 01 and 02.
- (b) Coal sampling for determining the HCl concentration identified in Condition D.1.9 (b) shall be performed at least once per month and whenever new coal (including **either a** different type of coal **or coal obtained from a** different supplier) is bunkered or burned, using one of the procedures specified in Condition D.1.10(c) or as provided by the fuel supplier in accordance with Condition D.1.10(d).

...

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document 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.

**Comment 3:**

Regarding page 27 of 40, Condition D.1.10(c) and (d), and pages 5 and 9 of the TSD, these conditions shall be revised such that no sampling to measure trace elements is required and correct reference methods are included in the permit documents. ASTM Method D6721 or EPA Method SW-846-9250 are the relevant methods to measure Cl concentration. These methods should replace ASTM Method D3638-04. Condition D.1.10(c) and (d) are identical conditions. Therefore, Griffin requests that Condition D.1.10(d) be deleted.

**Response to Comment 3:**

IDEM, OAQ agrees. Condition D.1.10(c) has been updated to reflect the correct references for sampling methods. Condition D.1.10(d) has been revised for clarification. The permit has been updated as follows:

D.1.10 Hydrogen Chloride Emissions and Chlorine Content

---

...

- (c) The samples shall be analyzed for hydrogen chloride and moisture using one of the following methods:
- (1) ~~ASTM D3683-04~~ **D6721-01** Standard Test Method for Trace Elements in Coal and Coke Ash by Atomic Absorption **Determination of Chlorine in Coal by Oxidative Hydrolysis Microcoulometry.**
  - (2) ASTM D3173-03 Standard Test Method for Moisture in the Analysis Sample of Coal and Coke.
  - (3) ASTM D3302-02a Standard Test Method for Total Moisture in Coal.
- (d) The fuel sampling and analysis requirement in this section may also be conducted by the fuel supplier using one of the following methods **in D.1.10(c)**:
- ~~(1) ASTM D3683-04 Standard Test Method for Trace Elements in Coal and Coke Ash by Atomic Absorption.~~
  - ~~(2) ASTM D3173-03 Standard Test Method for Moisture in the Analysis Sample of Coal and Coke.~~
  - ~~(3) ASTM D3302-02a Standard Test Method for Total Moisture in Coal.~~

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document 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.

**Comment 4:**

Regarding page 27 of 40, Condition D.1.10(b) of the permit and pages 5 and 8 of the TSD, Condition D.1.10(b) states that coal sampling is required when "new coal" is burned or bunkered. It is our understanding that "new coal" is burned in the boilers when the coal classification is changed (i.e., bituminous coal to anthracite or lignite). This understanding is consistent with the definition of "fuel type" in the Boiler MACT, 40 CFR 63.7575. Griffin requests IDEM to provide confirmation regarding Griffin's understanding of the definition of "new coal".

**Response to Comment 4:**

IDEM, OAQ defines "new coal" as a different type of coal (bituminous coal versus anthracite or lignite) or coal from a different supplier. This coal sampling is required to ensure that the P<sub>90</sub> value reflect the most accurate concentration of Cl, in order that that HCl emission calculations will show compliance with the minor HAP limits in this permit.

IDEM, OAQ has clarified the language in Condition D.1.10(b) to indicate that coal from a new supplier must be tested. See Response to Comment 2.

**Indiana Department of Environmental Management**  
**Office of Air Quality**  
 Technical Support Document (TSD) For a  
 Significant Permit Modification to a Part 70 Operating Permit

**Source Description and Location**

Source Name:	Griffin Industries, Inc.
Source Location:	CR 400 West, Route 1 Box 112, Newberry, Indiana 47499-9729
County:	Greene
SIC Code:	2077
Operation Permit No.:	T055-6360-00008
Operation Permit Issuance Date:	October 4, 2000
Significant Permit Modification No.:	055-24866-00008
Permit Reviewer:	ERG/TDP

**Existing Approvals**

The source was issued Part 70 Operating Permit No. 055-6360-00008 on October 4, 2000 and Administrative Amendment AA055-13832-00008 on March 15, 2001. The source submitted a Part 70 Renewal Application on January 4, 2005.

**County Attainment Status**

The source is located in Greene County.

<b>Pollutant</b>	<b>Status</b>
PM10	attainment
PM2.5	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Greene County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and nitrogen oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Greene 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) Greene County has been classified as attainment or unclassifiable in Indiana for CO, NO<sub>2</sub>, SO<sub>2</sub>, and PM10. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (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 in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

**Source Status**

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

<b>Pollutant</b>	<b>Emissions (tons/year)</b>
PM	140
PM10	140
SO <sub>2</sub>	<250
VOC	1.28
CO	188
NO <sub>x</sub>	60.9

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is in not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

<b>HAPs</b>	<b>Potential To Emit (tons/year)</b>
Hydrogen Chloride	9.98
Hydrogen Fluoride	1.46
Hexane	0.42
Other HAP	0.22
TOTAL	12.08

This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	--
PM10	9.0
PM2.5	3.0
SO <sub>2</sub>	67.0
NO <sub>x</sub>	60.0
VOC	0.00
CO	64.0
Pb	0.06

### Description of Proposed Modification

Griffin Industries, Inc. was issued a Part 70 Permit (Title V) on October 2, 2004 for a stationary animal and agricultural byproducts rendering station. A letter requesting changes to the permit was received on June 5, 2007. The requested changes included a request for a federally enforceable sourcewide permit limit of less than 10 tons per year of any single hazardous air pollutant (HAP) and less than 25 tons per year of combined HAP, such that the requirements of 40 CFR 63, Subpart DDDDD and 326 IAC 20-95 do not apply. The compliance date under the industrial boiler MACT is September 13, 2007.

### Enforcement Issues

There are no pending enforcement actions related to this modification.

### Emission Calculations

See Appendix A 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 permit modification request will not result in change of potential to emit for any regulated pollutant. However, source wide HAP emissions will be limited due to the modification request. The Part 70 Permit is being modified through a Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(b)(1)(D) because it seeks to establish or change a Part 70 Operating Permit Condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

### Federal Rule Applicability Determination

This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, Subpart DDDDD. The source operates boilers at a source (as defined in 40 CFR 63.7575), which is a minor source of HAP as defined in 40 CFR 63.2. This source has voluntarily requested a federally enforceable sourcewide HAP limit of less than 10 tons per year of a single HAP. Unlimited total combined HAP from this source remains less than 25 tons per year. This limit will ensure the source is a minor source of HAPs and is not subject to the requirements of 40 CFR 63, Subpart DDDDD.

The total amount of coal input to the boilers identified as Boilers 1 and 2 shall be limited such that the emissions of each individual hazardous air pollutant are less than 9.90 tons per twelve (12)

consecutive month period with compliance determined at the end of each month. Monthly HCl emissions shall be calculated using equation (1). The potential to emit all other HAP is less than 3 tons per year.

The Hydrogen Chloride emissions shall be calculated according to the following equations:

Using the measured chlorine concentration (ppm), the Permittee shall calculate the 90th percentile confidence level pollutant concentration for each boiler and then use this concentration to determine the HCl emissions. This concentration value is calculated as follows for each boiler:

$$P_{90} = \text{mean} + (\text{SD} * t)$$

Where,

- $P_{90}$  = 90th percentile confidence level pollutant concentration, in ppm  
Mean = Arithmetic average of the fuel pollutant concentration in the fuel samples, in ppm  
SD = Standard deviation of the pollutant concentration in the fuel samples, in ppm  
t = t distribution critical value for 90th percentile (0.1) probability for the appropriate degrees of freedom (number of samples minus one) as obtained from a Distribution Critical Value Table.

Using the 90th percentile chlorine concentration calculated above, the Permittee shall calculate the HCl emissions for both Boilers 01 and 02 as follows:

$$E_{\text{HCl}} = (1.028 * C_{\text{Cl}} * Q_{\text{Coal}}) / 10^6 \dots\dots \text{Equation (1)}$$

Where

- $E_{\text{HCl}}$  = Emissions of Hydrogen Chloride in tons per year  
1.028 = Molecular weight ratio of Hydrogen Chloride to Chlorine  
 $C_{\text{Cl}}$  = Chlorine content in coal, dry basis (ppm)  
 $Q_{\text{Coal}}$  = Coal Consumption in tons per year

To demonstrate compliance with the above emission limit, the Permittee shall calculate HAP emissions for HCl based on the type of coal and coal consumption. This HAP limit, in conjunction with the Condition D.1.9 and potential HAP emissions from Boiler 3 and Dryer 4 will limit the sourcewide single HAP and total HAP emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart DDDDD (Industrial, Commercial, and Institutional Boilers and Process Heaters) and 326 IAC 20-95 do not apply to this source.

**State Rule Applicability Determination**

326 IAC 20-95-1 (Industrial, Commercial, and Institutional Boilers and Process Heaters)  
This source is not subject to the requirements of 326 IAC 20-95-1 (Industrial, Commercial, and Institutional Boilers and Process Heaters) because the source has requested a federally enforceable sourcewide HAP limit of less than 10 tons per year of a single HAP and less than 25 tons per year of combined HAPs. This source is not a major source of HAP.

**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, 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 Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

Coal samples shall be composited and analyzed for the trace HAP substances identified in Condition D.1.9(b) and moisture at least once per month or whenever new coal is bunkered or burned.

### Proposed Changes

The Office of Air Quality (OAQ) has reviewed a permit modification application, submitted by Griffin Industries, Inc. on June 5, 2007, requesting the following revisions:

1. The Permittee has requested a federally enforceable sourcewide limit of less than 10 tons per year of a HCl. Boilers 01 and 02 at the Newberry plant use coals from different sources. For example, Boiler 01 currently uses coal from Indiana, referred to as Indiana coal, and Boiler 02 currently uses coal from Eastern Kentucky, referred to as Kentucky stoker coal. Although coal is received from different locations, coal type for both boilers is "bituminous."

HAP emissions from the coal combustion include acid gases, including hydrogen chloride (HCl) and hydrogen fluoride (HF), and trace metals, including lead and arsenic. The source has a potential to emit HCl of 9.98 tons per year. Therefore, Griffin Industries has requested a HAP limit for HCl. Remaining HAP at the source is less than 3 tons per year. Metallic HAPs are at negligible concentrations and are not included in the permit.

Griffin conducted coal analyses to quantify the chlorine concentration in the coals utilized as fuel in Boilers 01 and 02. The coal analyses were conducted in April and May 2007. The laboratory analyses were conducted using standard sampling procedures. Three samples of Kentucky coal and five samples of Indiana coal were analyzed to determine the chlorine concentration. The following table presents the results of these tests:

Coal Type	Average Cl Concentration Based on Analysis (ppm)
Kentucky Stoker Coal	803.73
Indiana Coal	96.45

Griffin Industries proposes to calculate the HCl emissions of the fuels used in Boiler 01 and Boiler 02 by utilizing methods specified in 40 CFR 63, Subpart DDDDD, specifically 63.7530(d), and fuel analysis results.

Using the measured chlorine concentration (ppm), the Permittee shall calculate the 90th percentile confidence level pollutant concentration for each boiler and then use this concentration to determine the HCl emissions. This concentration value is calculated as follows for each boiler:

$$P_{90} = \text{mean} + (\text{SD} * t)$$

Where,

$$P_{90} = \text{90th percentile confidence level pollutant concentration, in ppm}$$

- Mean = Arithmetic average of the fuel pollutant concentration in the fuel samples, in ppm
- SD = Standard deviation of the pollutant concentration in the fuel samples, in ppm
- t = t distribution critical value for 90th percentile (0.1) probability for the appropriate degrees of freedom (number of samples minus one) as obtained from a Distribution Critical Value Table.

Using the 90th percentile chlorine concentration calculated above, the Permittee shall calculate the HCl emissions for both Boilers 01 and 02 as follows:

$$E_{\text{HCl}} = (1.028 * C_{\text{Cl}} * Q_{\text{Coal}}) / 10^6 \dots\dots \text{Equation (1)}$$

Where

- $E_{\text{HCl}}$  = Emissions of Hydrogen Chloride in tons per year
- 1.028 = Molecular weight ratio of Hydrogen Chloride to Chlorine
- $C_{\text{Cl}}$  = Chlorine content in coal, dry basis (ppm)
- $Q_{\text{Coal}}$  = Coal Consumption in tons per year

To demonstrate compliance with the above emission limit, the Permittee shall calculate HCl emissions based on the type of coal and coal consumption.

This limit, combined with the individual HAP and total HAP emissions from other units at this source, limits individual HAP emissions from the entire source to less than ten (10) tons per year and combined HAP emissions from the entire source to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 20-95-1 (NESHAP) and 40 CFR 63, Subpart DDDDD are not applicable.

The Permittee has requested to utilize coal analysis, specifically the methods specified in 40 CFR 63.7521 and Table 6 of 40 CFR 63, Subpart DDDDD, for chlorine content to determine compliance with this limit.

2. General information has been updated in Section A.1. IDEM, OAQ has decided to remove the information regarding the Responsible Official from Section A.1 of the permit. Listing the name and/or title in the permit has resulted in unnecessary administrative amendments in the past. Therefore, IDEM, OAQ does not consider it beneficial to maintain or update this information in the permits. IDEM, OAQ will continue to retain this information up-to-date in their permit tracking system.
3. Office of Air Management (OAM) has been updated to Office of Air Quality (OAQ) throughout the permit.

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

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The Permittee owns and operates a stationary animal and agricultural byproducts rendering operation.

~~Responsible Official: F. Michael Schmidt~~  
Source Address: Route 1 Box 112, Newberry, IN 47449  
Mailing Address: Route 1 Box 112, Newberry, IN 47449  
Phone Number: 606-781-2010  
SIC Code: 2077  
County Location: Greene  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules  
Major Source, Section 112 of the Clean Air Act

3. The address for IDEM, OAQ has been updated throughout the permit to add mail codes, remove the P.O. Box, and update the zip code.

100 North Senate Avenue, ~~P. O. Box 6015~~  
Permit Branch: **MC 61-53 IGCN 1003**  
Compliance Branch: **MC 61-53 IGCN 1003**  
Air Compliance Section: **MC 61-53 IGCN 1003**  
Compliance Data Section: **MC 61-53 IGCN 1003**  
Asbestos Section: **MC 61-52 IGCN 1003**  
Technical Support and Modeling: **MC 61-50 IGCN 1003**  
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

The following changes have been made to the Part 70 Permit No.: T055-6360-00008, issued on October 4, 2000. New language is in **bold** and language shown in ~~strikeout~~ has been deleted.

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) fluidized, coal-fired boiler, identified as 01, constructed in 1981, with a heat input capacity of 50 million Btu per hour, using natural gas as a backup fuel, dry limestone injection for sulfur dioxide (SO<sub>2</sub>) control, a cyclone centrifugal separator and baghouse for particulate matter control, and exhausting to stack A;
- (b) One (1) traveling grate, coal-fired boiler, identified as 02, constructed in 1989, with a heat input capacity of 50 million Btu per hour, using a cyclone centrifugal separator for particulate matter control, and exhausting to stack B;
- (c) One (1) natural gas-fired dryer, identified as 04, constructed in 1994, with a heat input capacity of 20 million Btu per hour, using No. 2 fuel oil as a backup fuel, a cyclone centrifugal separator and a wet scrubber for particulate matter control, and exhausting to stack D;
- (d) One (1) natural gas-fired boiler, identified as 03, constructed in 1989, with a heat input capacity of 33.746 million Btu per hour, and exhausting to stack C.

(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 Hazardous Air Pollutants (HAP)

- (a) **In order to render the requirements of 326 IAC 20-95-1 and 40 CFR 63, Subpart DDDDD not applicable: hydrogen chloride (HCl) emissions from boilers 01 and 02 shall not exceed 9.9 tons total per twelve (12) consecutive month period with compliance determined at the end of each month.**
- (b) **Combined with the HCl, individual HAP, and combined HAP emissions from other units, the individual HAP emissions from the entire source are limited to less than ten (10) tons per year, and combined HAP emissions are limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 20-95-1 (NESHAP) and 40 CFR 63, Subpart DDDDD are not applicable.**

D.1.42 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1]

D.1.23 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

D.1.34 Particulate Matter (PM) [326 IAC 6-2-3]

D.1.45 Particulate Matter (PM) [326 IAC 6-2-4]

D.1.56 Particulate Matter (PM) [326 IAC 6-3-2(c)]

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D.1.67 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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**Compliance Determination Requirements**

D.1.78 Testing Requirements [326 IAC 2-7-6(1),(6)]

**D.1.9 HAP Emissions**

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Compliance with the HAP limits in condition D.1.1 shall be demonstrated using the following equations.

- (a) Using the measured chlorine concentration (ppm), the Permittee shall calculate the 90th percentile confidence level pollutant concentration for each boiler and then use this concentration to determine the HCl emissions. This concentration value is calculated as follows for each boiler:

$$P_{90} = \text{mean} + (\text{SD} * t)$$

Where

- $P_{90}$  = 90th percentile confidence level pollutant concentration, in ppm  
Mean = Arithmetic average of the fuel pollutant concentration in the fuel samples, in ppm  
SD = Standard deviation of the pollutant concentration in the fuel samples, in ppm  
t = t distribution critical value for 90th percentile (0.1) probability for the appropriate degrees of freedom (number of samples minus one) as obtained from a Distribution Critical Value Table.

- (b) The Hydrogen Chloride emissions shall be calculated according to the following equation:

$$E_{\text{HCl}} = (1.028 * C_{\text{Cl}} * Q_{\text{Coal}}) / 10^6 \dots\dots \text{Equation (1)}$$

Where

- $E_{\text{HCl}}$  = Emissions of Hydrogen Chloride in tons per year  
1.028 = Molecular weight ratio of Hydrogen Chloride to Chlorine  
 $C_{\text{Cl}}$  = Chlorine content in coal, dry basis (ppm)  
 $Q_{\text{Coal}}$  = Coal Consumption in tons per year

To demonstrate compliance with the above emission limit, the Permittee shall calculate HCl emissions based on the type of coal and coal consumption.

Compliance with this HAP limit, in conjunction with the potential HAP emissions from the Boiler 03 and Dryer 04 will limit the source wide single HAP and total HAP emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart DDDDD (Industrial, Commercial, and Institutional Boilers and Process Heaters) and 326 IAC 20-95 do not apply to this source.

**D.1.10 Hydrogen Chloride Emissions and Chlorine Content**

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- (a) The coal consumption ( $Q_{\text{Coal}}$ ) in Condition D.1.9 shall be determined each month based on the actual coal burned in Boilers 01 and 02.
- (b) Coal sampling for determining the HCl concentration identified in Condition D.1.9 (b) shall be performed at least once per month and whenever new coal (including different type of coal from different supplier) is bunkered or burned, using one of the procedures specified in Condition D.1.10(c) or as provided by the fuel supplier

in accordance with Condition D.1.10(d).

- (c) The samples shall be analyzed for hydrogen chloride and moisture using one of the following methods:
- (1) ASTM D3683-04 Standard Test Method for Trace Elements in Coal and Coke Ash by Atomic Absorption.
  - (2) ASTM D3173-03 Standard Test Method for Moisture in the Analysis Sample of Coal and Coke.
  - (3) ASTM D3302-02a Standard Test Method for Total Moisture in Coal.
- (d) The fuel sampling and analysis requirement in this section may also be conducted by the fuel supplier using one of the following methods:
- (1) ASTM D3683-04 Standard Test Method for Trace Elements in Coal and Coke Ash by Atomic Absorption.
  - (2) ASTM D3173-03 Standard Test Method for Moisture in the Analysis Sample of Coal and Coke.
  - (3) ASTM D3302-02a Standard Test Method for Total Moisture in Coal.

D.1.811 Sulfur Dioxide Emissions and Sulfur Content

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D.1.912 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6] [326 IAC 7-1.1] [326 IAC 7-2-1]

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D.1.4013 Particulate Matter (PM)

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

D.1.4114 Visible Emissions Notations

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D.1.4215 Parametric Monitoring

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D.1.4316 Broken or Failed Bag Detection

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D.1.4417 Control Device Inspections [326 IAC 2-7-1(21)(G)(xxix)]

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

D.1.4518 Record Keeping Requirements

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- ...
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain records in accordance with (1) and (4) below. Records maintained for (1) and (4) shall be sufficient to establish a 12 consecutive month annual emissions rate and shall be complete and sufficient to demonstrate compliance with the HAP limits established in Condition D.1.1 and D.1.9.
- (1) Actual coal usage since last compliance determination period and records of calculations per Condition D.1.9.
  - (2) Chlorine content and moisture content in the coal.

- (3) **Records of coal sampling performed in accordance with Condition D.1.10.**
- (4) **Records of emission rate calculations specified in Condition D.1.9.**
- (ed) To document compliance with Condition ~~D.1.14~~**D.1.14**, the Permittee shall maintain records of daily visible emission notations of the boilers stack exhaust. **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 run that day).**
- (ee) Pursuant to 40 CFR 60.40c, the Permittee shall record and maintain records of the amounts of fuel combusted during each day for a period of two years following the date of such record for boiler 03.
- (ef) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.1619 Reporting Requirements

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**SECTION D.2 FACILITY OPERATION CONDITIONS**

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

- (e) Material storage and handling facilities including:
  - (a1) seven (7) enclosed tanks totaling 420 tons of capacity, used for storing tallow/grease, with enclosed piping for material handling,
  - (b2) three (3) 250 ton capacity enclosed silos, used for storing meat meal, feather meal, and poultry meal, with three (3) screw conveyors for material handling, and
  - (e3) one (1) 30 ton capacity enclosed silo, used for storing blood meal, with one (1) screw conveyor for material handling.

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

**SECTION D.3 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)] Insignificant Activities**

- (a) **Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6:**
  - (1) Three (3) cold cleaners, each with 22 gallon reservoirs.

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

**Conclusion and Recommendation**

This proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 055-24866-00008. The staff recommend to the Commissioner that this Part 70 Significant Permit Modification be approved.

Appendix A: Emission Calculations  
HAP Calculations for Boiler 01

Company Name: Griffin Industries, Inc.  
 Address : CR 400 West, Route 1 Box 112, Newberry, Indiana 47499-9729  
 Significant Permit Modification: SPM055-24866-00008  
 Pit ID: 055-00008  
 Reviewer: ERG/TDP  
 Date: July 5, 2007

Potential Throughput - Boiler 01

(tons/yr)  
12000

HAP	Emission Factor 2 (lbs/ton coal burned)	Emissions (lbs/yr)	Emissions (tons/yr)
Hydrogen chloride	2.00E-01	2400.00	1.20E+00
Hydrogen fluoride	1.50E-01	1800.00	9.00E-01
Magnesium	1.10E-02	132.00	6.60E-02
Cyanide	2.50E-03	30.00	1.50E-02
Benzene	1.30E-03	15.60	7.80E-03
Selenium	1.30E-03	15.60	7.80E-03
Benzyl Chloride	7.00E-04	8.40	4.20E-03
Acetaldehyde	5.70E-04	6.84	3.42E-03
Methyl Chloride	5.30E-04	6.36	3.18E-03
Manganese	4.90E-04	5.88	2.94E-03
Lead	4.20E-04	5.04	2.52E-03
Arsenic	4.10E-04	4.92	2.46E-03
Isophorone	5.80E-04	6.96	3.48E-03
<b>Total PTE HAP</b>			<b>2.22</b>

Methodology:

Emission factors are from FIRE 6.25, for Industrial overfeed stoker SCC 1-02-002-05  
 Emission factor for hydrogen chloride is based on a maximum chlorine content of 97.0 ppm from coal sampling in May 2007.  
 Potential to Emit (tons/yr) = Potential Throughput (tons/yr) \* Emission Factor (lbs/ton) / 2000 lbs

Appendix A: Emission Calculations  
HAP Calculations for Boiler 02

Company Name: Griffin Industries, Inc.  
Address : CR 400 West, Route 1 Box 112, Newberry, Indiana 47499-9729  
Significant Permit Modification: SPM055-24866-00008  
Pit ID: 055-00008  
Reviewer: ERG/TDP  
Date: July 5, 2007

Potential Throughput - Boiler 02  
(tons/yr)  
7500

HAP	Emission Factor (lbs/ton coal)	Potential to Emit (lbs/yr)	Potential to Emit (tons/yr)
Hydrogen chloride	2.34	17550.00	8.78
Hydrogen fluoride	1.50E-01	1125.00	5.63E-01
Magnesium	1.10E-02	82.50	4.13E-02
Cyanide	2.50E-03	18.75	9.38E-03
Benzene	1.30E-03	9.75	4.88E-03
Selenium	1.30E-03	9.75	4.88E-03
Benzyl Chloride	7.00E-04	5.25	2.63E-03
Acetaldehyde	5.70E-04	4.28	2.14E-03
Methyl Chloride	5.30E-04	3.98	1.99E-03
Manganese	4.90E-04	3.68	1.84E-03
Lead	4.20E-04	3.15	1.58E-03
Arsenic	4.10E-04	3.08	1.54E-03
Isophorone	5.80E-04	4.35	2.18E-03
<b>Total PTE HAP</b>			<b>9.41</b>

Methodology:

Emission factors are from FIRE 6.25, for Industrial overfeed stoker SCC 1-02-002-05  
Emission factor for hydrogen chloride is based on a maximum chlorine content of 1,135.7 ppm from coal sampling in May 2007.  
Potential to Emit (tons/yr) = Potential Throughput (tons/yr) \* Emission Factor (lbs/ton) / 2000 lbs

**Appendix A: Emission Calculations  
Natural Gas Combustion Only  
MMBTU/HR<100  
One 33.75 Natural Gas Fired Boiler (Boiler 03)**

**Company Name:** Griffin Industries, Inc.  
**Address :** CR 400 West, Route 1 Box 112, Newberry, Indiana 47499-9729  
**Significant Permit Modification:** SPM055-24866-00008  
**Plt ID:** 055-00008  
**Reviewer:** ERG/TDP  
**Date:** July 5, 2007

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

33.8

295.7

Emission Factor in lb/MMCF	Pollutant						
	PM <sup>10*</sup>	PM <sup>10*</sup>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	
	7.6	7.6	0.6	100.0	5.5	84.0	
Potential Emission in tons/yr	1.12	1.12	0.09	14.8	0.81	12.4	

**Methodology**

All Emission factors are based on normal firing.  
MMBtu = 1,000,000 Btu  
MMCF - 1,000,000 Cubic Feet of Gas  
Potential Throughput (MMCF) = Heat Input Capacity (MMBTU/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 7/98)  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations  
Natural Gas Combustion Only  
MMBTU/HR<100  
Small Industrial Boiler**

Company Name: Griffin Industries, Inc.  
Address : CR 400 West, Route 1 Box 112, Newberry, Indiana 47499-9729  
Significant Permit Modification: SPM055-24866-00008  
Pit ID: 055-00008  
Reviewer: ERG/TDP  
Date: July 5, 2007

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	3.10E-04	1.77E-04	1.11E-02	2.66E-01	5.03E-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	Total HAP 1.9E+00
Potential Emission in tons/yr	7.39E-05	1.63E-04	2.07E-04	5.62E-05	3.10E-04	0.28

Methodology is the same as previous page.  
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: Emission Calculations  
Natural Gas Combustion Only  
Dryer 04**

**Company Name:** Griffin Industries, Inc.  
**Address :** CR 400 West, Route 1 Box 112, Newberry, Indiana 47499-9729  
**Significant Permit Modification:** SPM055-24866-00008  
**Pit ID:** 055-00008  
**Reviewer:** ERG/TDP  
**Date:** July 5, 2007

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

2000

175.2

	Pollutant						
	PM*	PM10*	SO2	NO <sub>x</sub>	VOC	CO	
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0	
Potential Emission in tons/yr	0.67	0.67	0.05	8.8	0.48	7.4	

**Methodology**

All Emission factors are based on normal firing.  
 MMBtu = 1,000,000 Btu  
 MMCF - 1,000,000 Cubic Feet of Gas  
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
 Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
 (AP-42 Supplement D 7/98)  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations  
 Natural Gas Combustion Only  
 MMBTU/HR<100  
 Dryer 04

Company Name: Griffin Industries, Inc.  
 Address : CR 400 West, Route 1 Box 112, Newberry, Indiana 47499-9729  
 Significant Permit Modification: SPM055-24866-00008  
 Pit ID: 055-00008  
 Reviewer: ERG/TDP  
 Date: July 5, 2007

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	1.84E-04	1.05E-04	6.57E-03	1.58E-01	2.98E-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	Total HAP 1.9E+00
Potential Emission in tons/yr	4.38E-05	9.64E-05	1.23E-04	3.33E-05	1.84E-04	0.17

Methodology is the same as previous page.  
 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: Emission Calculations  
One No. 2 Fuel Oil-fired Dryer (Dryer 04)**

**Company Name:** Griffin Industries, Inc.

**Address :** CR 400 West, Route 1 Box 112, Newberry, Indiana 47499-9729

**Significant Permit Modification:** SPM055-24866-00008

**Pit ID:** 055-00008

**Reviewer:** ERG/TDP

**Date:** July 5, 2007

Heat Input Capacity  
MMBtu/hour

Limited Throughput  
kgals/year

S = Weight % Sulfur

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Emission Factor (lb/kgal)	Pollutant				
	PM/PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
	2.0	71 (142.0 S)	20.0	0.34	5.0
Potential To Emit (tons/year)	1.08	38	10.8	0.18	2.71

\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal. Assume all PM emissions are equal to PM10.  
Note: Emission factors are from AP-42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98.  
1 gallon of No. 2 fuel oil has a heating value of 144905 Btu per gallon.

**METHODOLOGY**

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) \* 8760 hours/year \* 1 kgal/1000 gal \* 1 gal/O.144905 MMBtu  
Potential To Emit (tons/year) = Potential Throughput (MMCF/year) \* Emission Factor (lb/kgal) \* 1 ton/2000 lbs

See page 4 for HAPs emissions calculations.

**Appendix A: Emission Calculations  
Two (2) Boilers (B03 and B04) Using No. 2 Fuel Oil**

**Company Name:** Griffin Industries, Inc.

**Address :** CR 400 West, Route 1 Box 112, Newberry, Indiana 47499-9729

**Significant Permit Modification:** SPM055-24866-00008

**Pit ID:** 055-00008

**Reviewer:** ERG/TDP

**Date:** July 5, 2007

**HAPs - Metals**

Emission Factor (lb/MMBtu)	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential To Emit (tons/year)	3.5E-04	2.6E-04	2.6E-04	2.6E-04	7.9E-04

**HAPs - Metals (continued)**

Emission Factor (lb/MMBtu)	Mercury 3.0E-06	Mangamese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05	Total HAP 4.9E-05
Potential To Emit (tons/year)	2.6E-04	5.3E-04	2.6E-04	1.3E-03	0.004

No data was available in AP-42 for organic HAPs.

**METHODOLOGY**

Potential To Emit (tons/year) = Heat Input Capacity (MMBtu/hr) \* Emission Factor (lb/MMBtu) \* 8760 hours/year \* 1 ton/2000lb