



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: May 16, 2008

RE: New Fashion Pork / 027-25940-00005

FROM: Matthew Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

## Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER.dot12/03/07



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100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
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## Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**New Fashion Pork  
Route 1, Box 15A  
Loogootee, Indiana 47553**

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

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

Operation Permit No.: M027-25940-00005	
Issued by: Original signed by	Issuance Date: May 16, 2008
Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Expiration Date: May 16, 2018

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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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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

Source Address:	Route 1, Box 15A, Loogootee, Indiana 47553
Mailing Address:	P.O. Box 244, Jackson, MN 56143
General Source Phone Number:	(507) 847-4610
SIC Code:	2048
County Location:	Daviess
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) Kewanee boiler (identified as boiler no. 1), burning natural gas, with a heat input capacity of 6.3 MMBtu/hr, using propane as a backup fuel and exhausting to stack 6, installed in 1975.
- (b) One (1) Sellers boiler (identified as boiler no. 2), burning natural gas, with a heat input capacity of 8.4 MMBtu/hr, using propane as a backup fuel and exhausting to stack 7, installed in August, 1996.
- (c) One (1) grain and mill receiving pit, constructed prior to 1978, with a maximum receiving capacity of sixty-six hundred thousand (660,000) pounds of grains, mills and soft stock per hour.
- (d) One (1) bin loading, constructed prior to 1978, with a maximum loading capacity of sixty-six hundred thousand (660,000) pounds of grain, mills and soft stock per hour.
- (e) One (1) pelleting no. 1 process, constructed prior to 1978, with a maximum process rate of fifty thousand (50,000) pounds of feed pellets per hour, equipped with a cyclone that is integral to the process and exhausts to stack 3.
- (f) One (1) bulk station, constructed prior to 1978, with a maximum load-out rate of two hundred and twenty thousand (220,000) pounds of animal feed per hour.

## **SECTION B GENERAL CONDITIONS**

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

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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 2-1.1-1) shall prevail.

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

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- (a) This permit, M021-25940-00005, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

### **B.4 Enforceability**

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

### **B.5 Severability**

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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.6 Property Rights or Exclusive Privilege**

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

### **B.7 Duty to Provide Information**

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

**B.8 Certification**

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

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

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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- (a) All terms and conditions of permits established prior to M021-25940-00005 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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

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

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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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

**B.15 Source Modification Requirement**

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

**B.16 Inspection and Entry**

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

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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 permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

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

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

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

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

**B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

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

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

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

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

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

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

C.4 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 (Burning Regulations) is 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.

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

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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 is not federally enforceable.

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

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

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

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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 46204-2251

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

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

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

#### **C.9 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 46204-2251

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

### **C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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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, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

### **C.13 Instrument Specifications [326 IAC 2-1.1-11]**

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

## **Corrective Actions and Response Steps**

### **C.14 Response to Excursions or Exceedances**

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

- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test**

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

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

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

**C.16 Malfunctions Report [326 IAC 1-6-2]**

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

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

C.17 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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- (a) Reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS - Boilers

### Emissions Unit Description:

- (a) One (1) Kewanee boiler (identified as boiler no. 1), burning natural gas, with a heat input capacity of 6.3 MMBtu/hr, using propane as a backup fuel and exhausting to stack 6, installed in 1975.
- (b) One (1) Sellers boiler (identified as boiler no. 2), burning natural gas, with a heat input capacity of 8.4 MMBtu/hr, using propane as a backup fuel and exhausting to stack 7, installed in August, 1996.

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

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

#### D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (e) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), the particulate emissions from the Kewanee boiler, which was constructed after June 8, 1972, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input.

#### D.1.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate emissions from the Sellers Boiler (identified as boiler no. 2) which was constructed after September 21, 1983 shall be limited to 0.54 pounds of particulate matter per MMBtu heat input.

This limit is based on the following equation:

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

Where  $P_t$  = Emission Rate Limit (lb/MMBtu)

$Q$  = Total source heat input capacity rating in million Btu per hour (14.7MMBtu/hr)

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

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

### Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

#### D.1.4 Reporting Requirements

The natural gas boiler certification shall be submitted to the address listed in Section C General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas-fired boiler certification does require the certification by the "Authorized Individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS - Animal Feed Processing

### Emissions Unit Description:

- (c) One (1) grain and mill receiving pit, constructed prior to 1978, with a maximum receiving capacity of sixty-six hundred thousand (660,000) pounds of grains, mills and soft stock per hour.
- (d) One (1) bin loading, constructed prior to 1978, with a maximum loading capacity of sixty-six hundred thousand (660,000) pounds of grain, mills and soft stock per hour.
- (e) One (1) pelleting no. 1 process, constructed prior to 1978, with a maximum process rate of fifty thousand (50,000) pounds of feed pellets per hour, equipped with a cyclone that is integral to the process and exhausts to stack 3.
- (f) One (1) bulk station, constructed prior to 1978, with a maximum load-out rate of two hundred and twenty thousand (220,000) pounds of animal feed per hour.

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

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

#### D.2.1 Particulate [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3, particulate emissions from the grains and mills receiving pit, bin loading and bulk station shall not exceed the pound per hour limit provided in the table below:

Facility	Process Weight (tons/hour)	Particulate Emission Limit (pounds/hour)
Grain and Mills Receiving	330	64.1
Bin Loading	330	64.1
Bulk Station	110	52.2

- (b) Pursuant to 326 IAC 6-3, particulate emissions from the pelleting no. 1 shall not exceed the pound per hour limit provided in the table below:

Facility	Process Weight (tons/hour)	Particulate Emission Limit (pounds/hour)
Pelleting no. 1	25	35.4

#### D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### Compliance Determination Requirements

#### D.2.3 Particulate Control

In order to comply with Condition D.2.1, the cyclones used for particulate control shall be in operation and control emissions from the pelleting no. 1 facility at all times this facility is in operation.

**Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(2)]**

**D.2.4 Visible Emissions Notations**

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

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

**D.2.5 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of visible emission notations of the bin loading facility. The Permittee shall include in its daily record when a visible notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	New Fashion Pork
<b>Address:</b>	Route 1, Box 15A
<b>City:</b>	Loogootee, Indiana 47553
<b>Phone #:</b>	(507) 847-4610
<b>MSOP #:</b>	M021-25940-00005

I hereby certify that New Fashion Pork is :

still in operation.

no longer in operation.

I hereby certify that New Fashion Pork is :

in compliance with the requirements of MSOP M021-25940-00005.

not in compliance with the requirements of MSOP M021-25940-00005.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

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

**SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: New Fashion Pork  
Source Address: Route 1, Box 15A, Loogootee, IN 47553  
Mailing Address: P.O. Box 244, Jackson, MN 56143  
MSOP Permit No.: M027-25940-00005

<input type="checkbox"/> Natural Gas Only <input type="checkbox"/> Alternate Fuel burned From: _____ To: _____
--

I certify that, based on information and belief formed after reasonable inquiry, the statements information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

A certification by an authorized individual as defined by 326 IAC 2-1.1-1(1) is required for this report.

### MALFUNCTION REPORT

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

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

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

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

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

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

COMPANY: \_\_\_\_\_ PHONE NO. (    ) \_\_\_\_\_

LOCATION: (CITY AND COUNTY) \_\_\_\_\_

PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>New Fashion Pork</b>
<b>Source Location:</b>	<b>Route 1, Box 15A, Loogootee, IN 47553</b>
<b>County:</b>	<b>Daviess</b>
<b>SIC Code:</b>	<b>2048</b>
<b>Operation Permit No.:</b>	<b>M027-25940-00005</b>
<b>Permit Reviewer:</b>	<b>Summer Keown</b>

On April 9, 2008, the Office of Air Quality (OAQ) had a notice published in the Washington Times Herald, Washington, Indiana, stating that New Fashion Pork had applied for a renewal of their Minor Source Operating Permit. The notice also stated that the OAQ proposed to issue a Minor Source Operating 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.

**Comments and Responses**

On May 5, 2008, Larry Knepp of New Fashion Pork submitted comments to IDEM, OAQ on the draft MSOP.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

**Comment 1:**

Mr. Knepp advised IDEM that the one (1) pelleting no. 2 process has been removed from the source and requested that permit conditions related to that emission unit be removed from the permit.

**Response to Comment 1:**

IDEM agrees with the recommended changes. The permit has been revised and the permit conditions relating specifically to the pelleting no. 2 process have been removed from the permit and the remaining units have been renumbered accordingly.

**A.2 Emission Units and Pollution Control Equipment Summary**

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

...

(f) ~~One (1) pelleting no. 2 process, constructed prior to 1978, with a maximum process rate of twenty-eight thousand (28,000) pounds of feed pellets per hour, equipped with a cyclone that is integral to the process and exhausts to stack 4.~~

**SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS - Animal Feed Processing**

**Emissions Unit Description:**

...

(f) ~~One (1) pelleting no. 2 process, constructed prior to 1978, with a maximum process rate of twenty-eight thousand (28,000) pounds of feed pellets per hour, equipped with a cyclone that is integral to the process and exhausts to stack 4.~~

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

**D.2.1 Particulate [326 IAC 6-3]**

...

(b) Pursuant to 326 IAC 6-3, particulate emissions from the pelleting no. 1 ~~and pelleting no. 2~~ shall not exceed the pound per hour limit provided in the table below:

Facility	Process Weight (tons/hour)	Particulate Emission Limit (pounds/hour)
Pelleting no. 1	25	35.4
<del>Pelleting no. 2</del>	44	24.0

**D.2.3 Particulate Control**

In order to comply with Condition D.2.1, the cyclones used for particulate control shall be in operation and control emissions from the pelleting no. 1 ~~and pelleting no. 2 facilities~~ **facility** at all times ~~that these facilities are in operation.~~ **that this facility is** these facilities are in operation.

**Additional Changes**

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

Operation Permit No.: M0247-25940-00005	
Issued by:	Issuance Date:
Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Expiration Date:

**IDEM Contact**

(a) Questions regarding this proposed Minor Source Operating Permit can be directed to Summer Keown at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by

- telephone at (317) 232-8427 or toll free at 1-800-451-6027 extension 2-8427.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
  - (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

**Indiana Department of Environmental Management**  
**Office of Air Quality**  
**And Southwest Regional Office**

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

**Source Background and Description**

<b>Source Name:</b>	<b>New Fashion Pork</b>
<b>Source Location:</b>	<b>Route 1, Box 15A, Loogootee, IN 47553</b>
<b>County:</b>	<b>Daviess</b>
<b>SIC Code:</b>	<b>2048</b>
<b>Permit Renewal No.:</b>	<b>M027-25940-00005</b>
<b>Permit Reviewer:</b>	<b>Summer Keown</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from New Fashion Pork relating to the operation of an animal feed manufacturing plant.

**History**

On January 18, 2008, New Fashion Pork submitted an application to the OAQ requesting to renew its operating permit. New Fashion Pork was issued MSOP No. M027-16536-00005 on April 15, 2003.

**Permitted Emission Units and Pollution Control Equipment**

- (a) One (1) Kewanee boiler (identified as boiler no. 1), burning natural gas, with a heat input capacity of 6.3 MMBtu/hr, using propane as a backup fuel and exhausting to stack 6, installed in 1975.
- (b) One (1) Sellers boiler (identified as boiler no. 2), burning natural gas, with a heat input capacity of 8.4 MMBtu/hr, using propane as a backup fuel and exhausting to stack 7, installed in August, 1996.
- (c) One (1) grain and mill receiving pit, constructed prior to 1978, with a maximum receiving capacity of sixty-six hundred thousand (660,000) pounds of grains, mills and soft stock per hour.
- (d) One (1) bin loading, constructed prior to 1978, with a maximum loading capacity of sixty-six hundred thousand (660,000) pounds of grain, mills and soft stock per hour.
- (e) One (1) pelleting no. 1 process, constructed prior to 1978, with a maximum process rate of fifty thousand (50,000) pounds of feed pellets per hour, equipped with a cyclone that is integral to the process and exhausts to stack 3.
- (f) One (1) pelleting no. 2 process, constructed prior to 1978, with a maximum process rate of twenty-eight thousand (28,000) pounds of feed pellets per hour, equipped with a cyclone that is integral to the process and exhausts to stack 4.
- (g) One (1) bulk station, constructed prior to 1978, with a maximum load-out rate of two hundred and twenty thousand (220,000) pounds of animal feed per hour.

**Existing Approvals**

Since the issuance of the MSOP (M027-16536-00005) on April 15, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) Notice-Only Change No. 027-19811-00005, issued on December 28, 2004.
- (b) Notice-Only Change No. 027-20966-00005, issued on April 8, 2005.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

### **Air Pollution Control Justification as an Integral Part of the Process**

The applicant has submitted the following justification such that the two (2) cyclones be considered as an integral part of the pelleting no. 1 and no. 2 processes:

Pursuant to MSOP No. M037-16536-00005, issued on April 15, 2003, a November 14, 1995 EPA memorandum, titled "Calculating PTE and other Guidance for Grain Handling Facilities," specifically mentions product recovery cyclones association with pellet cooling facilities as an example of a control device that is integral to the process. This EPA memorandum states that "control measures are inherent to an operation when they are always operated and maintained for reasons other than community air quality protection. Examples of inherent control measures include (a) product collection devices for which the value of the product collected greatly exceeds the cost of the collection device, and (b) devices for which the primary purpose is to improve product-quality control, to recover product, or to enhance production operating efficiency (for example, product recovery cyclones associated with operations such as pellet coolins at feed mills)." Hence, the potential to emit PM10 from pelleting no. 1 and no. 2 processes will be calculated after the controls.

Pursuant to MSOP No. M037-16536-00005, issued on April 15, 2003, IDEM, OAQ has evaluated the justifications and agreed that the two (2) cyclones will be considered as an integral part of the pelleting no. 1 and no. 2. Therefore, the permitting level will be determined using the potential to emit after the two (2) cyclones. Operating conditions in the proposed permit will specify that these two (2) cyclones shall operate at all times when the pelleting no. 1 and no. 2 are in operation.

### **Emission Calculations**

See Appendix A of this document for detailed emission calculations.

### **County Attainment Status**

The source is located in Daviess County

<b>Pollutant</b>	<b>Designation</b>
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

#### **(a) Ozone Standards**

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.

- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
  - (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Daviess County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM2.5**  
Daviess County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.
  - (c) **Other Criteria Pollutants**  
Daviess County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
  - (d) **Fugitive Emissions**  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

### **Unrestricted Potential Emissions**

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (c) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

### **Actual Emissions**

No previous emission data has been received from the source.

### **Potential to Emit After Issuance**

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

Process/ Emission Unit	Potential To Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Processing Operations	175.3	84.0	0.0	0.0	0.0	0.0	0.0
Sellers boiler	0.16	0.28	0.60	0.20	3.09	5.63	0.07
Kewanee boiler	0.12	0.21	0.45	0.15	2.32	4.22	0.05
<b>Total Emissions</b>	<b>175.6</b>	<b>84.5</b>	<b>1.1</b>	<b>0.4</b>	<b>5.41</b>	<b>9.85</b>	<b>0.1</b>

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

**Federal Rule Applicability**

- (a) The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60, Subpart DD, are not included in the permit for the animal feed manufacturing plant. The source was constructed before August 3, 1978, and has not been modified or reconstructed.
- (b) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, are not included in the permit for the Sellers boiler. Although constructed after June 9, 1989, the maximum heat input capacity of the Sellers boiler is less than 10 MMBtu per hour.
- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

**State Rule Applicability - Entire Source**

326 IAC 2-2 (Prevention of Significant Deterioration)

The potential to emit each criteria pollutant from the existing minor source is less than 250 tons per year. This source is located in an attainment county and is not one of the twenty-eight (28) listed source categories. Therefore, 326 IAC 2-2 (PSD) is not applicable to the source.

326 IAC 2-3 (Emission Offset)

This source is located in an attainment county and is not one of the twenty-eight (28) listed source categories. The potential to emit of each criteria pollutant is less than 250 tons per year. Therefore, 326 IAC 2-3 (Emission Offset) is not applicable to the source.

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

The potential to emit hazardous air pollutants (HAPs) from the source is less than ten (10) tons per year for each individual HAP and less than twenty-five (25) tons per year for total HAPs. Therefore, 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) is not applicable to the source.

326 IAC 2-6 (Emission Reporting)

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

**326 IAC 5-1 (Opacity Limitations)**

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

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

**326 IAC 6-4-2 (Fugitive Dust Emissions: Emission Limitations)**

A source generating fugitive dust shall be in violation of this rule (326 IAC 6-4) if either of the following criteria are violated:

- (a) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period, or
- (b) If fugitive dust is visible crossing the boundary or property line of a source.

**326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

This source is not subject to the requirements of 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) because the source does not have fugitive emissions exceeding twenty-five (25) tons per year.

**State Rule Applicability – Animal Feed Processing**

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies), the allowable PM emission rates from the animal feed manufacturing plant shall not exceed the particulate emission limitations in pounds per hour as shown in the table below.

Facility	Process Weight		Particulate Emissions Limit (lbs/hr)
	(tons/hr)	(lbs/hr)	
Grain and Mills Receiving	330	660,000	64.1
Bin Loading	330	660,000	64.1
Pelleting No. 1	25	50,000	35.4
Pelleting No. 2	14	28,000	24.0
Bulk Station	110	220,000	52.2

The pounds per hour limitations were calculated using the following equations:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

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

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

The two (2) cyclones shall be in operation at all times the pelleting no. 1 and no. 2 facilities are in operation, in order to comply with this limit. There are no controls associated with the rest of the emission units at the plant. Based on the calculations provided in Appendix A, these emission units will be in compliance with this rule.

### State Rule Applicability - Kewanee Boiler

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

Pursuant to 326 IAC 6-2-3, the particulate emissions from the 6.3 MMBtu/hr Kewanee Boiler (identified as boiler no. 1) which was existing and in operation before September 21, 1983, shall not exceed the particulate emission rate calculated using the following equation:

$$Pt = \frac{(c \times a \times h)}{76.5 \times Q^{0.75} \times N^{0.25}} = \frac{(50)(0.67)(23)}{76.5 \times 6.3^{0.75} \times (1)^{0.25}}$$

$$Pt = 2.5 \text{ lbs/MMBtu}$$

Where:

- Pt = Emission rate limit (lbs/MMBtu)
- C = 50 ug/m<sup>3</sup>
- a = Plume rise factor (0.67)
- Q = Total source heat input capacity rating in million Btu per hour (6.3 MMBtu/hr)
- N = Number of Stacks
- h = Stack Height (ft)

However, 326 IAC 6-2-3(e) states that boilers constructed after June 8, 1972 with a heat input of 250 MMBtu/hr or less shall in no case exceed 0.6 pounds of particulate matter per MMBtu heat input. Since 0.6 pound particulate matter per MMBtu emission limit is less than the limit calculated using the equation, the Kewanee boiler shall be limited to 0.6 pounds of particulate matter per MMBtu heat input.

### State Rule Applicability - Sellers Boiler

#### 326 IAC 6-2-4 (Particulate Emission Limitations for Source of Indirect Heating)

Pursuant to 326 IAC 6-2-4, the particulate emissions from the 8.4 MMBtu/hr Sellers Boiler (identified as boiler no. 2) which was constructed after September 21, 1983 shall be limited to 0.54 pounds of particulate matter per MMBtu heat input.

This limit is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{Where } Pt = \text{Emission Rate Limit (lb/MMBtu)}$$
$$Q = \text{Total source heat input capacity rating in million Btu per hour (14.7MMBtu/hr)}$$

### Compliance Determination and Monitoring Requirements

- (a) To comply with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes, the cyclones used for particulate control shall be in operation and control emissions from the pelleting no. 1 and pelleting no. 2 facilities at all times these facilities are in operation.

(b) Visible Emissions Notations

- (1) Visible emission notations of the bin loading facility shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (2) 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.
- (3) 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.
- (4) 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.
- (5) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

**Recommendation**

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

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

An application for the purposes of this review was received on January 18, 2008.

**Conclusion**

The operation of this animal feed manufacturing plant shall be subject to the conditions of the attached MSOP Renewal No. M027-25940-00005.

**Company Name:** New Fashion Pork  
**Address City IN Zip:** Route 1, Box 15A, Loogootee, IN 47553  
**Permit Number:** M027-25940-00005  
**Reviewer:** Summer Keown  
**Date:** January 31, 2008

**Uncontrolled Emissions in Tons/Year**

	PM (tons/yr)	PM <sub>10</sub> (tons/yr)	SO <sub>2</sub> (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Total HAPs (tons/yr)
Grain and Mill Receiving	24.60	3.6	0.0	0.0	0.0	0.0	0.0
Internal Handling (Bin Loading)	88	49	0.0	0.0	0.0	0.0	0.0
Pelleting no. 1	1314	657	0.0	0.0	0.0	0.0	0.0
Pelleting no. 2	736	368	0.0	0.0	0.0	0.0	0.0
Bulk Station	1.6	0.4	0.0	0.0	0.0	0.0	0.0
Kewanee Boiler	0.12	0.21	0.45	4.22	0.15	2.32	0.05
Sellers Boiler	0.16	0.28	0.60	5.63	0.20	3.09	0.07
<b>Total</b>	<b>2164.48</b>	<b>1078.49</b>	<b>1.05</b>	<b>9.85</b>	<b>0.35</b>	<b>5.41</b>	<b>0.12</b>

**Controlled Emissions in Tons/Year**

	PM (tons/yr)	PM <sub>10</sub> (tons/yr)	SO <sub>2</sub> (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Total HAPs (tons/yr)
Grain and Mill Receiving	24.60	3.6	0.0	0.0	0.0	0.0	0.0
Internal Handling (Bin Loading)	88	49	0.0	0.0	0.0	0.0	0.0
Pelleting no. 1	39.0	20	0.0	0.0	0.0	0.0	0.0
Pelleting no. 2	22.10	11	0.0	0.0	0.0	0.0	0.0
Bulk Station	1.6	0.4	0.0	0.0	0.0	0.0	0.0
Kewanee Boiler	0.12	0.21	0.45	4.22	0.15	2.32	0.05
Sellers Boiler	0.16	0.28	0.60	5.63	0.20	3.09	0.07
<b>Total</b>	<b>175.58</b>	<b>84.49</b>	<b>1.05</b>	<b>9.85</b>	<b>0.35</b>	<b>5.41</b>	<b>0.12</b>

**Appendix A: Emissions Calculations  
6.3 MMBtu/hr Kewanee Boiler**

**Company Name: New Fashion Pork  
Address City IN Zip: Route 1, Box 15A, Loogootee, IN 47553  
Permit Number: M027-25940-00005  
Reviewer: Summer Keown  
Date: January 31, 2008**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
6.3	55.2

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.05	<b>0.21</b>	0.02	2.76	<b>0.15</b>	<b>2.32</b>

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.  
MMBtu = 1,000,000 Btu  
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Propane Combustion in 6.3 MMBtu/hr Kewanee Boiler**

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	Sulfur Content (gr/100 ft <sup>3</sup> )
6.3	603.1	15

Emission Factor in lb/kgal	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.4	0.4	1.5 (0.10S)	14.0	0.50	1.9
Potential Emission in tons/yr	<b>0.12</b>	0.12	<b>0.45</b>	<b>4.22</b>	0.15	0.57

\*PM and PM10 emission factors are condensable and filterable PM10 combined.

**Methodology**

1 gallon of propane has a heating value of 91,500 Btu  
All emission factors are based on normal firing  
MMBtu = 1,000,000 Btu  
MMCF = 1,000,000 cubic feet of gas  
Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) \* 8760 hrs/yr \* 1 kgal/1,000 gal \* 1 gal/0.0915 MMBtu  
Emission Factors from AP-42, Chapter 1.5-1  
Emission (tons/yr) = Throughput (kgals/yr) \* emission factor (lb/kgal)/2,000 lb/ton  
See following page for HAPs emission calculations.

**Appendix A: Emissions Calculations  
6.3 MMBtu/hr Kewanee Boiler**

**HAPs Emissions**  
**Company Name: New Fashion Pork**  
**Address City IN Zip: Route 1, Box 15A, Loogootee, IN 47553**  
**Permit Number: M027-25940-00005**  
**Reviewer: Summer Keown**  
**Date: January 31, 2008**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.795E-05	3.311E-05	2.070E-03	4.967E-02	9.382E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.380E-05	3.035E-05	3.863E-05	1.049E-05	5.795E-05

Methodology is the same as page 1.

**Total HAPs: 0.05**

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

**Appendix A: Emissions Calculations  
8.4 MMBtu/hr Sellers Boiler**

**Company Name:** New Fashion Pork  
**Address City IN Zip:** Route 1, Box 15A, Loogootee, IN 47553  
**Permit Number:** M027-25940-00005  
**Reviewer:** Summer Keown  
**Date:** January 31, 2008

**Natural Gas Combustion in 8.4 MMBtu/hr Sellers Boiler**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
8.4	73.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.07	<b>0.28</b>	0.02	3.68	<b>0.20</b>	<b>3.09</b>

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
 \*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.  
 MMBtu = 1,000,000 Btu  
 MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Propane Combustion in 8.4 MMBtu/hr Sellers Boiler**

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	Sulfur Content (gr/100 ft <sup>3</sup> )
8.4	804.2	15

Emission Factor in lb/kgal	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.4	0.4	1.5 (0.10S)	14.0	0.5	1.9
Potential Emission in tons/yr	<b>0.16</b>	0.16	<b>0.60</b>	<b>5.63</b>	0.20	0.76

\*PM and PM10 emission factors are condensable and filterable PM10 combined.

**Methodology**

1 gallon of propane has a heating value of 91,500 Btu  
 All emission factors are based on normal firing  
 MMBtu = 1,000,000 Btu  
 MMCF = 1,000,000 cubic feet of gas  
 Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) \* 8760 hrs/yr \* 1 kgal/1,000 gal \* 1 gal/0.0915 MMBtu  
 Emission Factors from AP-42, Chapter 1.5-1  
 Emission (tons/yr) = Throughput (kgals/yr) \* emission factor (lb/kgal)/2,000 lb/ton  
 See following page for HAPs emission calculations.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**HAPs Emissions**

**Company Name: New Fashion Pork**

**Address City IN Zip: Route 1, Box 15A, Loogootee, IN 47553**

**Permit Number: M027-25940-00005**

**Reviewer: Summer Keown**

**Date: January 31, 2008**

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	7.726E-05	4.415E-05	2.759E-03	6.623E-02	1.251E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.840E-05	4.047E-05	5.151E-05	1.398E-05	7.726E-05

Methodology is the same as page 1.

**Total HAPs: 0.07**

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

**Appendix A: Emissions Calculations  
Animal Feed Processing Operations**

**Company Name: New Fashion Pork  
Address City IN Zip: Route 1, Box 15A, Loogootee, IN 47553  
Permit Number: M027-25940-00005  
Reviewer: Summer Keown  
Date: January 31, 2008**

Emissions Unit	Receiving Capacity (tons/hr)	Control Efficiency	PM			PM10		
			Emission Factor (lbs/ton)	PTE before controls (tons/year)	PTE after controls (tons/year)	Emission Factor (lbs/ton)	PTE before controls (tons/year)	PTE after controls (tons/year)
Grain and Mill Receiving	330	0.0	0.017	24.6	24.6	0.0025	3.6	3.6
Internal Handling (Bin Loading)	330	0.0	0.061	88.0	88.0	0.034	49	49
Pelleting no. 1	25	97%	0.36	1314.0	39.0	0.18	657	20
Pelleting no. 2	14	97%	0.36	736.0	22.1	0.18	368	11
Bulk Station	110	0%	0.0033	1.6	1.6	0.00008	0.4	0.4
<b>Totals:</b>				<b>2164.2</b>	<b>175.3</b>		<b>1078.0</b>	<b>84.0</b>

Emission factors are from AP-42, Tables 9.9.1-1 and 9.9.1-2