



# 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: October 21, 2008

RE: Criterion Catalysts & Technologies, L.P. / 091-26255-00053

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 13-17-3-4 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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October 21, 2008

Michael Burke  
Plant Manager  
Criterion Catalysts and Technologies, L.P.  
1800 East US 12  
Michigan City, Indiana 46360

Re: T 091-26255-00053  
1<sup>st</sup> Significant Permit Modification to  
Part 70 Permit No.: T 091-21619-00053

Dear Mr. Burke:

Criterion Catalysts and Technologies, L.P. was issued Part 70 Operating Permit No. T 091-21619-00053 on December 13, 2007 for the operation of a stationary alumina powder and specialty chemical production plant. A letter requesting changes to this permit was received on March 13, 2008. 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 incorporation of an alternative monitoring plan (AMP) for the purpose of demonstrating ongoing compliance with applicable emission limits to that found in the requirements of New Source Performance Standard (NSPS) Part 60, Subpart UUU (Standards of Performance for Calciners and Dryers in Mineral Industries. In addition, the one (1) natural gas-fired high temperature dryer, constructed in 1996 and modified in 2000, identified as SEACAP dryer (EX-496), has been removed from the permit because it was shut down and removed from the source in early March 2008.

Other modifications to the permit are listed in the attached Technical Support Document and addendum to the Technical Support Document. For your convenience, the entire Part 70 Operating Permit as modified will be provided at issuance.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Joe Sachse, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Joe Sachse or extension (4-5378), or dial (317) 234-5378.

Sincerely, *Original Signed By:*

Tripurari P. Sinha, Ph. D., Section Chief  
Permits Branch  
Office of Air Quality

**Attachments:**

Copy of the revised permit  
Technical Support Document  
Addendum to the TSD

**cc:**

File – LaPorte County  
LaPorte County Health Department

U.S. EPA, Region V  
Air Compliance Inspector  
Compliance Data Section  
Permits Administration and Development

David R. Jordan, P.E.  
*Principal-in-Charge*  
Environmental Resources Management  
Fidelity Plaza, Tower Two  
11350 N. Meridian Street, Suite 220  
Carmel, Indiana 46032



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## Part 70 Operating Permit OFFICE OF AIR QUALITY

### Criterion Catalysts and Technologies, L.P. 1800 East U.S. 12, Michigan City, Indiana 46360

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

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

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

Operation Permit No.: T091-21619-00053	
Issued by: Original Signed By  Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: December 13, 2007  Expiration Date: December 13, 2012
First Significant Permit Modification No: 091-26255-00053	
Issued by:  <i>Original Signed By:</i>  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: October 21, 2008  Expiration Date: December 13, 2012

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary alumina powder and specialty chemical production plant.

Source Address:	1800 East U.S. 12, Michigan City, Indiana 46360
Mailing Address:	1800 East U.S. 12, Michigan City, Indiana 46360
General Source Phone Number:	(219) 874-2611
SIC Code:	2819
County Location:	LaPorte
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

### 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) storage bin, constructed in 1951, identified as P-SB1 (E-26), with one (1) baghouse for particulate control, and exhausting to stack V.
- (b) One (1) storage bin, constructed in 1951, identified as P-SB2 (E-52), with one (1) baghouse for particulate control, and exhausting to stack K.
- (c) Ten (10) silos, collectively identified as P-SILOS, with each segment equipped with a fabric filter for a total of 17 fabric filters, individually identified as:
  - (1) silo 1 (segments E-195, E-196, E-197, and E-198), constructed in 1987, exhausting to stacks AA1, AA2, AA3, and AA4, respectively;
  - (2) silo 2 (segments E-216 and E-217), constructed in 1987, exhausting to stacks AA7 and AA8, respectively;
  - (3) silo 3 (segment E-199), constructed in 1987, exhausting to stack AA5;
  - (4) silo 4 (segment E-200), constructed in 1987, exhausting to stack AA6;
  - (5) silo 5 (segments E-204 and EA-130-012), constructed in 1987 and 1978, respectively, exhausting to stacks AA9 and C, respectively;
  - (6) silo 6 (segment E-201), constructed in 1987, exhausting to stack AA10;
  - (7) silo 7 (segment EA-130-009), constructed in 1978, exhausting to stack FF;
  - (8) silo 8 (segment E-202), constructed in 1987, exhausting to stack AA11;

- (9) silo 9 (segments E-30, E-193), constructed in 1956 and 1987, respectively, exhausting to stacks AA13 and D, respectively; and
  - (10) silo 10 (segments E203, E-194), constructed in 1987, exhausting to stacks AA12 and AA14, respectively.
- (d) Two (2) day bins, both constructed in 1975, identified as S-DBE (EX-422) and S-DBW (EX-423), each with one (1) baghouse for particulate control, and exhausting to stacks Q1 and Q2, respectively.
  - (e) Two (2) sodium aluminate reactors, identified as P-SAR1 (F-31), constructed in 1968, and P-SAR2 (F-32), constructed in 1972, and exhausting to stacks R and S, respectively.
  - (f) Two (2) aluminum sulfate reactors, identified as P-ASR1 (F-34), constructed in 1968, and P-ASR2 (F-37), constructed in 1972, and exhausting to stacks T and U, respectively.
  - (g) One (1) bulk bag loading process, constructed in 1983, identified as P-BBL (T-159), with two (2) baghouses (E-160 and E-176) for particulate control, and exhausting to stack BB.
  - (h) One (1) bulk loading process, identified as P-BL (E-190), consisting of one (1) rail car loading system, constructed in 1983, and one seal and container loading system, constructed in 1992, both equipped with one (1) baghouse for particulate control, and exhausting to stack CC.
  - (i) Two (2) mixers, both constructed in 1975, identified as S-MIX (EX-421), both equipped with one (1) baghouse for particulate control, and exhausting to stack Y.
  - (j) Two (2) calciners, identified as S-C1 (EX-579), constructed in 1965, exhausting to stacks P4, H1 and H2, and S-C2 (EX-579), constructed in 1975, exhausting to stacks P4, O1, O2 and O3, both equipped with one (1) baghouse (the DCC baghouse) for particulate control. NO<sub>2</sub> emissions from S-C1 and S-C2 are controlled voluntarily by a natural gas fired selective catalytic reduction (SCR) system rated at less than 10 MMBtu/hr.
  - (k) One (1) pneumatic transfer process from the fines grinder system, constructed in 1975, identified as S-PT (EX-104), equipped with one (1) baghouse for particulate control, and exhausting to stack J.
  - (l) Bag loadout and other particulate matter processes, constructed in 1975, and a screener and fines grinder feed system, constructed in 2005, collectively identified as ADC #1 (S-DC1 (EX-631-023)), equipped with one (1) baghouse for particulate control, and exhausting to stack F.
  - (m) One (1) natural gas-fired dryer, constructed in 1965, identified as S-D1 (EX-300-23), rated at 13.8 MMBtu/hr, and exhausting to stack P1.
  - (n) One (1) natural gas-fired low temperature dryer, constructed in 1965 and modified in 2000, identified as SD-3 (FX-300-35K), rated at 5 MMBtu/hr, using no controls, and exhausting to stack P2.
  - (o) One (1) natural gas-fired spray dryer, constructed in 1956 and modified in 1995 and 2006, identified as P-SD (E-110), with a burner (E-336) rated at 80MMBtu/hr, and using a cyclone for product recovery (integral to the process), and exhausting to the baghouses (E-357A, E-357B, E-357C). Particulate emissions are controlled using two operating scenarios. In Alternative Operating Scenario 1, particulate is controlled using three (3) baghouses (E-357A, E-357B, E-357C) in parallel (integral to the process). In Alternative Operating Scenario 2, particulate is controlled using three baghouses (E-357A, E-357B, E-357C) in parallel (integral to the process) and a wet scrubber (T-107). In both operating scenarios, emissions exhaust through stack B. This is an affected unit under 40 CFR 60, Subpart UUU.

- (p) One (1) natural gas-fired boiler, constructed in 1961, identified as BLR 2 (E-68), rated at 15.1 MMBtu/hr, and exhausting to Stack N.
- (q) One (1) bulk loading process containing one (1) rail car loading system, constructed in 2006, identified as P-BLR (E-239), exhausting to stack GG and equipped with one (1) baghouse (E-190) for particulate control.

Maximum capacities and throughputs not listed in the descriptions above have been included in an IDEM, OAQ confidential file.

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 not exceeding 145 gallons per 12 months and not subject to a NESHAP. [326 IAC 8-3-2, 326 IAC 8-3-5]
- (b) One (1) Area Dust Collector, identified as ADC #2. This area dust collector controls all emissions from insignificant activities that exhaust inside the building. [326 IAC 6-3-2]

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 Definitions [326 IAC 2-7-1]**

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

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

- (a) This permit, T 091-21619-00053, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-3-3. 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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 [326 IAC 2-7-5(5)]**

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, 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 the "responsible official" as defined by 326 IAC 2-7-1(34). 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 [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]**

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

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

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

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

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 appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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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 (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

Facsimile Number: 317-233-6865  
Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

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

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, 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.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to 091-26255-00053 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.

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

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

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

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

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

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

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

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

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

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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 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ 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.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 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.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

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

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

- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2.

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

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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) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

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

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C

## SOURCE OPERATION CONDITIONS

### Entire Source

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

**C.1 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 Opacity [326 IAC 5-1]**

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

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

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

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

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

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

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

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

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or

before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ 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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

##### C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

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

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

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

**C.11 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.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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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 [326 IAC 2-7-5][326 IAC 2-7-6]**

**C.13 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) 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.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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

**C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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

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

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

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

**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]  
[326 IAC 2-2][326 IAC 2-3]

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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) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
- (i) Baseline actual emissions;
- (ii) Projected actual emissions;
- (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
- (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:

- (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
  - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

- (1) The name, address, and telephone number of the major stationary source.
- (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
- (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
- (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

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

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

### **Stratospheric Ozone Protection**

#### **C.20 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) storage bin, constructed in 1951, identified as P-SB1 (E-26), with one (1) baghouse for particulate control, and exhausting to stack V.
- (b) One (1) storage bin, constructed in 1951, identified as P-SB2 (E-52), with one (1) baghouse for particulate control, and exhausting to stack K.
- (c) Ten (10) silos, collectively identified as P-SILOS, with each segment equipped with a fabric filter for a total of 17 fabric filters, individually identified as:
  - (1) silo 1 (segments E-195, E-196, E-197, and E-198), constructed in 1987, exhausting to stacks AA1, AA2, AA3, and AA4, respectively;
  - (2) silo 2 (segments E-216 and E-217), constructed in 1987, exhausting to stacks AA7 and AA8, respectively;
  - (3) silo 3 (segment E-199), constructed in 1987, exhausting to stack AA5;
  - (4) silo 4 (segment E-200), constructed in 1987, exhausting to stack AA6;
  - (5) silo 5 (segments E-204 and EA-130-012), constructed in 1987 and 1978, respectively, exhausting to stacks AA9 and C, respectively;
  - (6) silo 6 (segment E-201), constructed in 1987, exhausting to stack AA10;
  - (7) silo 7 (segment EA-130-009), constructed in 1978, exhausting to stack FF;
  - (8) silo 8 (segment E-202), constructed in 1987, exhausting to stack AA11;
  - (9) silo 9 (segments E-30, E-193), constructed in 1956 and 1987, respectively, exhausting to stacks AA13 and D, respectively; and
  - (10) silo 10 (segments E203, E-194), constructed in 1987, exhausting to stacks AA12 and AA14, respectively.
- (d) Two (2) day bins, both constructed in 1975, identified as S-DBE (EX-422) and S-DBW (EX-423), each with one (1) baghouse for particulate control, and exhausting to stacks Q1 and Q2, respectively.
- (e) Two (2) sodium aluminate reactors, identified as P-SAR1 (F-31), constructed in 1968, and P-SAR2 (F-32), constructed in 1972, and exhausting to stacks R and S, respectively.
- (f) Two (2) aluminum sulfate reactors, identified as P-ASR1 (F-34), constructed in 1968, and P-ASR2 (F-37), constructed in 1972, and exhausting to stacks T and U, respectively.
- (g) One (1) bulk bag loading process, constructed in 1983, identified as P-BBL (T-159), with two (2) baghouses (E-160 and E-176) for particulate control, and exhausting to stack BB.
- (h) One (1) bulk loading process, identified as P-BL (E-190), consisting of one (1) rail car loading system, constructed in 1983, and one seal and container loading system, constructed in 1992, both equipped with one (1) baghouse for particulate control, and exhausting to stack CC.
- (i) Two (2) mixers, both constructed in 1975, identified as S-MIX (EX-421), both equipped with one (1) baghouse for particulate control, and exhausting to stack Y.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

- (j) Two (2) calciners, identified as S-C1 (EX-579), constructed in 1965, exhausting to stacks P4, H1 and H2, and S-C2 (EX-579), constructed in 1975, exhausting to stacks P4, O1, O2 and O3, both equipped with one (1) baghouse (the DCC baghouse) for particulate control. NO<sub>2</sub> emissions from S-C1 and S-C2 are controlled voluntarily by a natural gas fired selective catalytic reduction (SCR) system rated at less than 10 MMBtu/hr.
- (k) One (1) pneumatic transfer process from the fines grinder system, constructed in 1975, identified as S-PT (EX-104), equipped with one (1) baghouse for particulate control, and exhausting to stack J.
- (l) Bag loadout and other particulate matter processes, constructed in 1975, and a screener and fines grinder feed system, constructed in 2005, collectively identified as ADC #1 (S-DC1 (EX-631-023)), equipped with one (1) baghouse for particulate control, and exhausting to stack F.
- (m) One (1) natural gas-fired dryer, constructed in 1965, identified as S-D1 (EX-300-23), rated at 13.8 MMBtu/hr, and exhausting to stack P1.
- (n) One (1) bulk loading process containing one (1) rail car loading system, constructed in 2006, identified as P-BLR (E-239), exhausting to stack GG and equipped with one (1) baghouse (E-190) for particulate control.

(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 PSD Minor Limit [326 IAC 2-2]

- (a) The emissions of PM from the bulk bag loading process (P-BBL) and the bulk loading process (P-BL) shall each be limited to less than 2.85 pounds per hour. Compliance with these limits renders the requirements of 326 IAC 2-2 (PSD) not applicable to the 1983 modification.
- (b) The fourteen (14) silo segments (E-195, E-196, E-197, E-198, E-216, E-217, E-199, E-200, E-204, E-201, E-202, E-193, E203, and E-194) shall be subject to the following:
  - (1) The PM emissions from each of the fourteen (14) silo segments (E-195, E-196, E-197, E-198, E-216, E-217, E-199, E-200, E-204, E-201, E-202, E-193, E203, and E-194) shall be limited to less than 0.407 pounds per hour.
  - (2) The PM<sub>10</sub> emissions from each of the fourteen (14) silo segments (E-195, E-196, E-197, E-198, E-216, E-217, E-199, E-200, E-204, E-201, E-202, E-193, E203, and E-194) shall be limited to less than 0.24 pounds per hour.

Compliance with these limits renders the requirements of 326 IAC 2-2 (PSD) not applicable to the 1987 modification.

- (c) Pursuant to Significant Source Modification 091-21226-00053, issued on January 20, 2006, the PM and PM10 emissions from the bulk loading process identified as P-BLR shall be limited to 0.12 pounds per hour.

Compliance with these limits renders the requirements of 326 IAC 2-2 (PSD) not applicable to the 2006 modification.

**D.1.2 Particulate Emissions [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Process), the allowable particulate emission rate from each of the facilities listed below shall be limited as shown in the following table:

Unit ID	Allowable Emission Rate (lb/ton throughput)
P-SB1 (E-26)	1.78
P-SB2 (E-52)	1.78
P-SILOS	1.97
S-DBE (EX-422)	3.03
S-DBW (EX-423)	3.03
P-SAR1 (F-31)	1.89
P-SAR2 (F-32)	1.89
P-ASR1 (F-34)	1.87
P-ASR2 (F-37)	1.87
P-BBL (T-159)	5.30
P-BL (E-190)	1.90
S-MIX (EX-421)	3.34
S-C1 (EX-579)	3.63
S-C2 (EX-579)	3.63
S-PT (EX-104)	6.48
ADC#1 (EX-631-023)	6.95
S-D1 (EX-300-23)	2.73
P-BLR (E-239)	1.78

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for S-C1, S-C2, P-SB1, P-SB2, P-BBL, P-BL, and P-BLR and their control devices.

**Compliance Determination Requirements**

**D.1.4 Particulate Controls**

- (a) In order to comply with Conditions D.1.1 and D.1.2, each baghouse associated with the following processes shall be in operation and control emissions at all times that the process is in operation:
- (1) One (1) storage bin identified as P-SB1 (E-26);
  - (2) One (1) storage bin identified as P-SB2 (E-52);
  - (3) One (1) day bin identified as S-DBE (EX-422);
  - (4) One (1) day bin identified as S-DBW (EX-423);
  - (5) One (1) bulk bag loading process identified as P-BBL (T-159);
  - (6) One (1) bulk loading process containing one rail car loading system, identified as P-BL (E-190) and one (1) sealand container loading system identified as P-BL (E-190);
  - (7) Two (2) mixers identified as S-MIX (EX-421);
  - (8) Two (2) calciners identified as S-C1 and SC-2 (EX-579);
  - (9) One (1) pneumatic transfer process for the fines grinder system identified as S-PT (EX-104);

- (10) Bag loadout, screener, fines grinder system and other particulate matter processes identified as ADC#1 (EX-631-023); and
  - (11) One (1) bulk loading process containing one rail car loading system, identified as P-BLR (E-239).
- (b) In order to comply with Condition D.1.2, the fabric filters for particulate control shall be in operation and control the emissions from P-SILOS at all times that the silos are in operation.
  - (c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### **D.1.5 Visible Emissions Notations [40 CFR 64]**

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- (a) Visible emission notations of the exhaust from the stacks for S-C1 (DCC baghouse), S-C2 (DCC baghouse), P-SB1 (stack V), P-SB2 (stack K), P-BBL (stack BB), P-BL (stack CC), and P-BLR (stack GG) shall be performed once per day during normal daylight operations 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### **D.1.6 Parametric Monitoring [40 CFR 64]**

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The Permittee shall record the pressure drop across the baghouses used in conjunction with the processes identified as S-C1, S-C2, P-SB1, P-SB2, P-BBL, P-BL, and P-BLR at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouses is outside the normal range of 1.0 to 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit. The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### **D.1.7 Broken or Failed Bag Detection [40 CFR 64]**

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

provisions of this permit (Section B - Emergency Provisions).

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

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

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

#### **D.1.8 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.5, the Permittee shall maintain a daily record of visible emission notations of the process/control device stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the process. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

- (q) One (1) natural gas-fired boiler, constructed in 1961, identified as BLR 2 (E-68), rated at 15.1 MMBtu/hr, and exhausting to Stack N.

(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 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from BLR2 shall be limited to 0.8 lbs per MMBtu.

Pursuant to 326 IAC 6-2-3, boilers existing and in operation before September 21, 1983 shall be limited by the following equation or by 0.8 lbs per MMBtu, whichever is more stringent:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where

- C = max ground level concentration (= 50  $\Phi$ m/m<sup>3</sup>)  
Pt = emission rate limit (lbs/MMBtu)  
Q = total source heat input capacity (MMBtu/hr)  
N = number of stacks = 1  
a = plume rise factor = 0.67  
h = stack height (ft)

The more stringent PM emission limit for this boiler is 0.8 lbs/MMBtu

## SECTION D.3

## FACILITY OPERATION CONDITIONS

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

- (a) One (1) natural gas-fired spray dryer, constructed in 1956 and modified in 1995 and 2006, identified as P-SD (E-110), with a burner (E-336) rated at 80MMBtu/hr, and using a cyclone for product recovery (integral to the process), and exhausting to the baghouses (E-357A, E-357B, E-357C). Particulate emissions are controlled using two operating scenarios. In Alternative Operating Scenario 1, particulate is controlled using three (3) baghouses (E-357A, E-357B, E-357C) in parallel (integral to the process). In Alternative Operating Scenario 2, particulate is controlled using three baghouses (E-357A, E-357B, E-357C) in parallel (integral to the process) and a wet scrubber (T-107). In both operating scenarios, emissions exhaust through stack B. This is an affected unit under 40 CFR 60, Subpart UUU.

(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 PSD Minor Limit [326 IAC 2-2]

Pursuant to Significant Source Modification No. 091-21226-00053, issued on January 20, 2006, the PM and PM<sub>10</sub> emissions from the natural gas-fired spray dryer, identified as P-SD (E-110), shall be limited to 6.62 pounds per hour.

Compliance with this limit renders the requirements of 326 IAC 2-2 (PSD) not applicable to the 2006 modification under SSM 091-21226-00053.

#### D.3.2 Monitoring Requirements [326 IAC 12]

- (a) When operating under Alternative Operating Scenario 1, the Permittee shall monitor emissions pursuant to 40 CFR 60.734(a).
- (b) When operating under Alternative Operating Scenario 2, the Permittee shall install, operate, and maintain continuous monitoring system(s) (CMS) to measure and record the ratio of total liquid (or scrubbing liquid) flow rate to the scrubber to the gas flow rate entering or exiting the scrubber (flue gas treated). This ratio of scrubbing liquid to flue gas treated is the "liquid-to-gas ratio." The CMS must be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. The monitoring system(s) which are contained in the applicable Performance Specifications of Appendix B of Part 60 must be used. 40 CFR 60.13 requires, among other things, that each CMS complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period.

### Compliance Determination Requirements

#### D.3.3 Particulate Controls

In order to comply with Condition D.3.1, the Permittee shall control particulate emissions from the natural gas-fired spray dryer, identified as P-SD (E-110), according to one of the following Operating Scenarios:

- (a) Alternative Operating Scenario 1:
- (1) The baghouses shall be in operation and control emissions at all times that the P-SD dryer is in operation.
  - (2) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The

notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) Alternative Operating Scenario 2:

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

D.3.4 Testing Requirements [326 IAC 2-7-6(1)-(6)][326 IAC 2-1.1-11][326 IAC 2-2]

In order to demonstrate compliance with Condition D.3.1, the Permittee shall perform PM and PM<sub>10</sub> testing for the spray dryer identified as P-SD (E-110), utilizing methods as approved by the Commissioner. PM<sub>10</sub> includes filterable and condensable PM<sub>10</sub>. Testing shall be conducted in accordance with Section C- Performance Testing.

The Permittee is required to conduct testing under both Alternative Operating Scenario 1 and Alternative Operating Scenario 2. The PM and PM<sub>10</sub> testing for each alternative operating scenario shall be conducted as follows:

(a) Alternative Operating Scenario 1 (using the three (3) baghouses to control particulate emissions):

The Permittee shall conduct testing prior to December 2011. In the event that Criterion is operating under Alternate Operating Scenario 2 in December 2011, such testing shall be performed within 180 days of commencing operation under Alternate Operating Scenario 1 after this date. This test shall be repeated at least once every five (5) years from the date of the valid compliance demonstration.

(b) Alternative Operating Scenario 2 (also using the wet scrubber to control particulate emissions):

Within 180 days of startup of the wet scrubber, the source shall conduct a performance test for particulate matter at the spray dryer in accordance with 40 CFR 60.8. The performance test shall consist of three (3) test runs and the sampling time of each test run must be at least two hours. The source shall notify U.S. EPA at least 30 days prior to conducting the performance test to allow U.S. EPA to review the protocol and to have an observer present during the test. During the performance testing, and using the continuous monitoring system(s) (CMS), the source shall measure and record the liquid-to-gas ratio at least every 15 minutes during the entire performance test and record the average liquid-to-gas ratio during each test run and the arithmetic average liquid-to-gas ratio of the three (3) test runs. The operating limit established during the performance test must represent the conditions in existence when the wet scrubber and baghouses are being properly operated and maintained to meet the emission limitation. This test shall be repeated at least once every five (5) years from the date of the valid compliance demonstration. Compliance testing performed on November 6-7, 2007 determined the arithmetic average liquid-to-gas ratio of the three (3) test runs to be 0.0051 gallons per minute per pound per hour of air flow.

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

### **D.3.5 Record Keeping Requirements [326 IAC 12]**

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- (a) In order to demonstrate compliance with Condition D.3.3, the Permittee shall keep a daily record of the operating scenario used to control particulate emissions from the dryer.
- (b) In order to demonstrate compliance with Condition D.3.2(b), the continuous monitoring system(s) (CMS) must determine and record the hourly average liquid-to-gas ratio of all recorded readings from four or more data points equally spaced over each one-hour period. The Permittee shall determine and record once each day, from the recordings of the continuous monitoring device(s), an arithmetic average over a two-hour period of the liquid-to-gas ratio.
- (c) Pursuant to 326 IAC 2-7-5(3)(B)(ii), The Permittee shall maintain the records of the ratio of scrubbing liquid to flue gas treated at the facility for at least five (5) years.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.3.6 Reporting Requirements**

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In order to demonstrate compliance with Conditions D.3.2(b) and D.3.5(b), the Permittee shall submit reports of the exceedance of the liquid-to-gas ratio semi-annually to U.S. EPA and IDEM as required by 40 CFR 60.735. Exceedances are defined as any two (2) hour period when the average liquid-to-gas ratio is less than 80 percent of the arithmetic average liquid-to-gas ratio of the three (3) test runs of the most recent performance test that demonstrated compliance with the particulate matter standard in 40 CFR Part 60, Subpart UUU. Compliance testing performed on November 6-7, 2007, determined that the two-hour average liquid-to-gas ratio be maintained at or above 0.0041 gallons per minute per pound per hour of air flow.

## SECTION D.4

## FACILITY OPERATION CONDITIONS

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

#### Insignificant Activities

- (a) Degreasing not exceeding 145 gallons per 12 months. [326 IAC 8-3-2][326 IAC 8-3-5]
- (b) Emissions from insignificant activities that exhaust inside the building, controlled by one (1) Area Dust Collector, identified as ADC #2. [326 IAC 6-3-2]

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

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

#### D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee 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.

#### D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5 (a)]

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

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

#### D.4.3 Particulate Emissions [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the insignificant activities that exhaust inside the building, controlled by one (1) Area Dust Collector, identified as ADC #2 shall not exceed 4.1 pounds per hour based on a process weight rate of 2,000 pounds per hour. The particulate emission limitation was calculated using the following equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

## SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) natural gas-fired spray dryer, constructed in 1956 and modified in 1995 and 2006, identified as P-SD (E-110), with a burner (E-336) rated at 80MMBtu/hr, and using a cyclone for product recovery (integral to the process), and exhausting to the baghouses (E-357A, E-357B, E-357C). Particulate emissions are controlled using two operating scenarios. In Alternative Operating Scenario 1, particulate is controlled using three (3) baghouses (E-357A, E-357B, E-357C) in parallel (integral to the process). In Alternative Operating Scenario 2, particulate is controlled using three baghouses (E-357A, E-357B, E-357C) in parallel (integral to the process) and a wet scrubber (T-107). In both operating scenarios, emissions exhaust through stack B.

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

### New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

#### E.1.1 General Provisions Relating to New Source Performance Standards Under 40 CFR Part 60 [326 IAC 12-1] [40 CFR Part 60, Subpart A]

- (a) The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1-1, apply to the natural gas-fired spray dryer, identified as P-SD (E-110), except when otherwise specified in 40 CFR Part 60, Subpart UUU.
- (b) Pursuant to 40 CFR 60.7, the Permittee shall submit all of the required notifications and reports to:

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

#### E.1.2 New Source Performance Standards for Calciners and Dryers in Mineral Industries [40 CFR Part 60, Subpart UUU] [326 IAC 12]

Pursuant to 40 CFR Part 60, Subpart UUU, the Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart UUU (included as Attachment A), which are incorporated by reference as 326 IAC 12, for the natural gas-fired spray dryer, identified as P-SD (E-110):

- (1) 40 CFR 60.730(a) and (c);
- (2) 40 CFR 60.731;
- (3) 40 CFR 60.732;
- (4) 40 CFR 60.733;
- (5) 40 CFR 60.734(a) and (d);
- (6) 40 CFR 60.735;
- (7) 40 CFR 60.736; and
- (8) 40 CFR 60.737.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Criterion Catalysts and Technologies, L.P.  
Source Location: 1800 East U.S. 12, Michigan City, Indiana 46360  
Mailing Address: 1800 East U.S. 12, Michigan City, Indiana 46360  
Permit Renewal No.: T 091-21619-00053

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Criterion Catalysts and Technologies, L.P.  
Source Location: 1800 East U.S. 12, Michigan City, Indiana 46360  
Mailing Address: 1800 East U.S. 12, Michigan City, Indiana 46360  
Permit Renewal No.: T 091-21619-00053

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li><input type="checkbox"/> The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li><input type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.</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:
Describe the cause of the Emergency:

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

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
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:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

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

### Part 70 Semi-Annual Report 40 CFR Part 60, Subpart UUU Semi-Annual Report

Source Name: Criterion Catalysts and Technologies, L.P.  
Source Address: 1800 East U.S. 12, Michigan City, Indiana 46360  
Mailing Address: 1800 East U.S. 12, Michigan City, Indiana 46360  
Permit Renewal No.: T 091-21619-00053  
SPM No.: 091-26255-00053  
Facility: Natural gas-fired spray dryer, identified as P-SD (E-110)  
Parameter: Alternative Operating Scenario 2 (also using the wet scrubber to control particulate emissions)  
Limit: Two-hour average liquid-to-gas ratio greater than or equal to 0.0041 gallons per minute per pound per hour of air flow

Year: \_\_\_\_\_

	# of Deviations	Cumulative # of Deviations
Month 1		
Month 2		
Month 3		
Month 4		
Month 5		
Month 6		

Deviation/s occurred on (date): \_\_\_\_\_

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

Attach a signed certification to complete this report.

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

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

Source Name: Criterion Catalysts and Technologies, L.P.  
Source Location: 1800 East U.S. 12, Michigan City, Indiana 46360  
Mailing Address: 1800 East U.S. 12, Michigan City, Indiana 46360  
Permit Renewal No.: T 091-21619-00053

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

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Attachment A**  
**NSPS 40 CFR Part 60, Subpart UUU**

**Criterion Catalysts and Technologies, L.P.**  
**1800 East US 12, Michigan City, Indiana 46360**

**Significant Permit Modification No. T 089-26535-00497**

**Subpart UUU—Standards of Performance for Calciners and Dryers in Mineral Industries**

**§ 60.730 Applicability and designation of affected facility.**

(a) The affected facility to which the provisions of this subpart apply is each calciner and dryer at a mineral processing plant. Feed and product conveyors are not considered part of the affected facility. For the brick and related clay products industry, only the calcining and drying of raw materials prior to firing of the brick are covered.

(b) An affected facility that is subject to the provisions of subpart LL, Metallic Mineral Processing Plants, is not subject to the provisions of this subpart. Also, the following processes and process units used at mineral processing plants are not subject to the provisions of this subpart: vertical shaft kilns in the magnesium compounds industry; the chlorination-oxidation process in the titanium dioxide industry; coating kilns, mixers, and aerators in the roofing granules industry; and tunnel kilns, tunnel dryers, apron dryers, and grinding equipment that also dries the process material used in any of the 17 mineral industries (as defined in §60.731, "Mineral processing plant").

(c) The owner or operator of any facility under paragraph (a) of this section that commences construction, modification, or reconstruction after April 23, 1986, is subject to the requirements of this subpart.

**§ 60.731 Definitions.**

As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.

*Calciner* means the equipment used to remove combined (chemically bound) water and/or gases from mineral material through direct or indirect heating. This definition includes expansion furnaces and multiple hearth furnaces.

*Control device* means the air pollution control equipment used to reduce particulate matter emissions released to the atmosphere from one or more affected facilities.

*Dryer* means the equipment used to remove uncombined (free) water from mineral material through direct or indirect heating.

*Installed in series* means a calciner and dryer installed such that the exhaust gases from one flow through the other and then the combined exhaust gases are discharged to the atmosphere.

*Mineral processing plant* means any facility that processes or produces any of the following minerals, their concentrates or any mixture of which the majority (>50 percent) is any of the following minerals or a combination of these minerals: alumina, ball clay, bentonite, diatomite, feldspar, fire clay, fuller's earth, gypsum, industrial sand, kaolin, lightweight aggregate, magnesium compounds, perlite, roofing granules, talc, titanium dioxide, and vermiculite.

**§ 60.732 Standards for particulate matter.**

Each owner or operator of any affected facility that is subject to the requirements of this subpart shall comply with the emission limitations set forth in this section on and after the date on which the initial performance test required by §60.8 is completed, but not later than 180 days after the initial startup, whichever date comes first. No emissions shall be discharged into the atmosphere from any affected facility that:

(a) Contains particulate matter in excess of 0.092 gram per dry standard cubic meter (g/dscm) [0.040 grain per dry standard cubic foot (gr/dscf)] for calciners and for calciners and dryers installed in series and in excess of 0.057 g/dscm (0.025 gr/dscf) for dryers; and

(b) Exhibits greater than 10 percent opacity, unless the emissions are discharged from an affected facility using a wet scrubbing control device.

[57 FR 44503, Sept. 28, 1992, as amended at 65 FR 61778, Oct. 17, 2000]

**§ 60.733 Reconstruction.**

The cost of replacement of equipment subject to high temperatures and abrasion on processing equipment shall not be considered in calculating either the “fixed capital cost of the new components” or the “fixed capital cost that would be required to construct a comparable new facility” under §60.15. Calciner and dryer equipment subject to high temperatures and abrasion are: end seals, flights, and refractory lining.

**§ 60.734 Monitoring of emissions and operations.**

(a) With the exception of the process units described in paragraphs (b), (c), and (d) of this section, the owner or operator of an affected facility subject to the provisions of this subpart who uses a dry control device to comply with the mass emission standard shall install, calibrate, maintain, and operate a continuous monitoring system to measure and record the opacity of emissions discharged into the atmosphere from the control device.

(b) In lieu of a continuous opacity monitoring system, the owner or operator of a ball clay vibrating grate dryer, a bentonite rotary dryer, a diatomite flash dryer, a diatomite rotary calciner, a feldspar rotary dryer, a fire clay rotary dryer, an industrial sand fluid bed dryer, a kaolin rotary calciner, a perlite rotary dryer, a roofing granules fluid bed dryer, a roofing granules rotary dryer, a talc rotary calciner, a titanium dioxide spray dryer, a titanium dioxide fluid bed dryer, a vermiculite fluid bed dryer, or a vermiculite rotary dryer who uses a dry control device may have a certified visible emissions observer measure and record three 6-minute averages of the opacity of visible emissions to the atmosphere each day of operation in accordance with Method 9 of appendix A of part 60.

(c) The owner or operator of a ball clay rotary dryer, a diatomite rotary dryer, a feldspar fluid bed dryer, a fuller's earth rotary dryer, a gypsum rotary dryer, a gypsum flash calciner, gypsum kettle calciner, an industrial sand rotary dryer, a kaolin rotary dryer, a kaolin multiple hearth furnace, a perlite expansion furnace, a talc flash dryer, a talc rotary dryer, a titanium dioxide direct or indirect rotary dryer or a vermiculite expansion furnace who uses a dry control device is exempt from the monitoring requirements of this section.

(d) The owner or operator of an affected facility subject to the provisions of this subpart who uses a wet scrubber to comply with the mass emission standard for any affected facility shall install, calibrate, maintain, and operate monitoring devices that continuously measure and record the pressure loss of the gas stream through the scrubber and the scrubbing liquid flow rate to the scrubber. The pressure loss monitoring device must be certified by the manufacturer to be accurate within 5 percent of water column gauge pressure at the level of operation. The liquid flow rate monitoring device must be certified by the manufacturer to be accurate within 5 percent of design scrubbing liquid flow rate.

**§ 60.735 Recordkeeping and reporting requirements.**

(a) Records of the measurements required in §60.734 of this subpart shall be retained for at least 2 years.

(b) Each owner or operator who uses a wet scrubber to comply with §60.732 shall determine and record once each day, from the recordings of the monitoring devices in §60.734(d), an arithmetic average over a 2-hour period of both the change in pressure of the gas stream across the scrubber and the flowrate of the scrubbing liquid.

(c) Each owner or operator shall submit written reports semiannually of exceedances of control device operating parameters required to be monitored by §60.734 of this subpart. For the purpose of these reports, exceedances are defined as follows:

(1) All 6-minute periods during which the average opacity from dry control devices is greater than 10 percent; or

(2) Any daily 2-hour average of the wet scrubber pressure drop determined as described in §60.735(b) that is less than 90 percent of the average value recorded according to §60.736(c) during the most recent performance test that demonstrated compliance with the particulate matter standard; or

(3) Each daily wet scrubber liquid flow rate recorded as described in §60.735(b) that is less than 80 percent or greater than 120 percent of the average value recorded according to §60.736(c) during the most recent performance test that demonstrated compliance with the particulate matter standard.

**ATTACHMENT A**  
**NSPS 40 CFR Part 60, Subpart UUU**

(d) The requirements of this section remain in force until and unless the Agency, in delegating enforcement authority to a State under section 111(c) of the Clean Air Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such State. In that event, affected facilities within the State will be relieved of the obligation to comply with this section provided that they comply with the requirements established by the State.

[57 FR 44503, Sept. 28, 1992, as amended at 58 FR 40591, July 29, 1993]

**§ 60.736 Test methods and procedures.**

(a) In conducting the performance tests required in §60.8, the owner or operator shall use the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in §60.8(b).

(b) The owner or operator shall determine compliance with the particulate matter standards in §60.732 as follows:

(1) Method 5 shall be used to determine the particulate matter concentration. The sampling time and volume for each test run shall be at least 2 hours and 1.70 dscm.

(2) Method 9 and the procedures in §60.11 shall be used to determine opacity from stack emissions.

(c) During the initial performance test of a wet scrubber, the owner or operator shall use the monitoring devices of §60.734(d) to determine the average change in pressure of the gas stream across the scrubber and the average flowrate of the scrubber liquid during each of the particulate matter runs. The arithmetic averages of the three runs shall be used as the baseline average values for the purposes of §60.735(c).

**§ 60.737 Delegation of authority.**

(a) In delegating implementation and enforcement authority to a State under section 111(c) of the Act, the authorities contained in paragraph (b) of this section shall be retained by the Administrator and not transferred to a State.

(b) Authorities which will not be delegated to States: No restrictions.

**Attachment B**  
**Letter from U.S. EPA to Criterion Catalysts and Technologies, LP**  
**dated September 6, 2007**

**Criterion Catalysts and Technologies, L.P.**  
**1800 East US 12, Michigan City, Indiana 46360**

**Significant Permit Modification No. T 089-26535-00497**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

RECEIVED  
9/12/07

SEP 06 2007

REPLY TO THE ATTENTION OF:

AE-17J

Mr. Michael Burke  
Plant Manager  
Criterion Catalysts & Technologies, LP  
1800 E. US 12  
Michigan City, Indiana 46360-2098

Re: Alternative Monitoring Request for NSPS Part 60, Subpart UUU

Dear Mr. Burke:

Thank you for your letter, dated August 6, 2007, to the United States Environmental Protection Agency (U.S. EPA), requesting approval of an alternative monitoring plan (AMP) to that found in the requirements of the New Source Performance Standards (NSPS) Part 60, Subpart UUU (Standards of Performance for Calciners and Dryers in Mineral Industries). Specifically, Criterion Catalysts & Technologies (Criterion) requests approval to continuously monitor the gas flow rate entering or exiting the wet scrubber in lieu of continuously monitoring the gas phase pressure drop across the scrubber. In addition, Criterion commits to continuously monitoring the scrubbing liquid flow rate to the scrubber which is also a requirement of 40 CFR Part 60, Subpart UUU.

40 CFR § 60.13 states that after receipt and consideration of written application, U.S. EPA may approve alternatives to any monitoring procedures or requirements of Part 60.

Criterion operates a spray dryer system that is subject to the NSPS Subpart UUU. The spray dryer system is equipped with three baghouses followed by a non-Venturi type wet scrubber. Although the facility currently relies on the baghouses to meet the particulate matter emission standard and a continuous opacity monitoring system to meet the monitoring requirements of Subpart UUU, the facility wants to incorporate the wet scrubber into its compliance approach to gain greater operational flexibility. For subject dryers equipped with wet scrubbers, the monitoring provisions of 40 CFR § 60.734(d) require owners or operators to install, calibrate, maintain and operate monitoring devices that continuously measure and record the pressure drop of the gas stream through the scrubber and the scrubber liquid flow rate. Criterion explains in its August 6, 2007, letter that the gas phase pressure drop has limited impact on the performance of a non-Venturi type scrubber and therefore is not an appropriate continuous monitoring parameter.

U.S. EPA concurs with Criterion that the gas phase pressure drop is not an appropriate continuous monitoring parameter for a wet scrubber that does not use a Venturi design for particulate matter emission control. In addition, U.S. EPA believes that the ratio of scrubbing liquid to flue gas treated (liquid-to-gas ratio) is an appropriate monitoring parameter for a wet scrubber. Therefore, pursuant to 40 CFR § 60.13, U.S. EPA approves the following alternative continuous monitoring system (CMS) plan for the scrubber on Criterion's spray dryer:

1. Criterion must install, operate and maintain continuous monitoring system(s) to measure and record the ratio of total liquid (or scrubbing liquid) flow rate to the scrubber to the gas flow rate entering or exiting the scrubber (flue gas treated). This ratio of scrubbing liquid to flue gas treated is the "liquid-to-gas ratio." The continuous monitoring system(s) must be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. The monitoring system(s) must meet the requirements of the General Provisions of Part 60. Additional procedures for location of the continuous monitoring system(s) which are contained in the applicable Performance Specifications of Appendix B of Part 60 must be used. 40 CFR § 60.13 requires, among other things, that each CMS complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period (i.e., the liquid-to-gas ratio must be recorded each successive 15-minute period). The CMS must determine and record the hourly average liquid-to-gas ratio of all recorded readings from four or more data points equally spaced over each one-hour period. The owner or operator must determine and record once each day, from the recordings of the continuous monitoring device(s), an arithmetic average over a two-hour period of the liquid-to-gas ratio.
2. Within 180 days of startup of the wet scrubber, Criterion must conduct a performance test for particulate matter at the spray dryer in accordance with 40 C.F.R. § 60.8. The performance test must consist of three test runs and the sampling time of each test run must be at least two hours. Criterion must notify U.S. EPA at least 30 days prior to conducting the performance test to allow U.S. EPA to review the protocol and to have an observer present during the test. During the performance testing, and using the continuous monitoring system(s), Criterion must measure and record the liquid-to-gas ratio at least every 15 minutes during the entire performance test and record the average liquid-to-gas ratio during each test run and the arithmetic average liquid-to-gas ratio of the three test runs. The operating limit established during the performance test must represent the conditions in existence when the wet scrubber and baghouses are being properly operated and maintained to meet the emission limitation.
3. Criterion must maintain records of the ratio of the scrubbing liquid to flue gas treated at the facility for at least two years.
4. Criterion must submit reports of exceedances of the liquid-to-gas ratio semi-annually to U.S. EPA and the Indiana Department of Environmental Management as required by 40 CFR § 60.735. Exceedances are defined as follows:

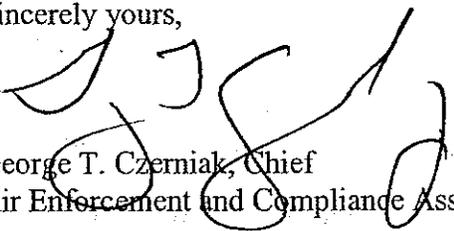
- a. Any two hour period when the average liquid-to-gas ratio is less than 80 percent of the arithmetic average liquid-to-gas ratio of the three test runs of the most recent performance test that demonstrated compliance with the particulate matter standard in 40 CFR Part 60, Subpart UUU.

In addition, it is important to note that in Criterion's case, the baghouses are essential to achieve compliance with the particulate matter emission rate. Stack testing performed by Criterion shows that the baghouses achieve 98 percent efficiency of particulate removal. Therefore, the baghouses must also have monitoring systems in place that continuously monitor emissions and operations. 40 CFR § 60.734(a) states, among other things, that with the exception of process units which use wet scrubbers to comply with the mass emission standard of Subpart UUU, the owner or operator who uses a dry control device to comply with the mass emission standard of Subpart UUU must install, calibrate, maintain and operate a continuous monitoring system to measure and record the opacity of emissions discharged into the atmosphere from the control device. We do not believe that the exception noted above applies to Criterion because the scrubber alone is not being used to comply with the mass emission standard. Therefore, Criterion must comply with both 40 CFR § 60.734(a), which contains the monitoring requirements that apply to Criterion's baghouses and 40 CFR § 60.734(d), which contains the monitoring requirements that apply to Criterion's wet scrubber.

Via this letter, we are approving an AMP for Criterion's wet scrubber which satisfies the requirements of 40 C.F.R. § 60.734(d). Now Criterion must determine how it will comply with the monitoring provisions of § 60.734(a) for the baghouses. For a baghouse, 40 CFR § 60.734(a) requires the installation of a continuous opacity monitor to measure and record the opacity of emissions to the atmosphere. However, in the case of Criterion, it may not be feasible to measure the opacity at the outlet of the scrubber due to the interference from water from the wet scrubber. Therefore, Criterion may request alternative monitoring procedures to either continuously measure the opacity between the baghouses and the scrubber, or to measure alternative parameters. 40 CFR § 60.13(i) specifically states that alternative monitoring procedures can be requested in the event that a monitoring system would not provide accurate measurements due to interference caused by liquid water; when alternative locations for installing continuous monitoring systems would enable accurate and representative measurements; or when the proposed continuous monitoring system adequately demonstrates a definite and consistent relationship between its measurements and the measurements of opacity. In any event, any proposed alternative monitoring plan should include a justification for the request and a description of the parameters you plan to measure and their proposed values for demonstrating compliance, the measurement techniques, the monitoring frequency, and the averaging time.

If you have any questions regarding this letter, please contact Linda H. Rosen, of my staff, at (312) 886-6810.

Sincerely yours,



George T. Czerniak, Chief  
Air Enforcement and Compliance Assurance Branch

cc: Craig Henry, Acting Section Chief  
Office of Enforcement-Air Section  
Indiana Department of Environmental Management

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document (TSD) for a Part 70 Significant Permit Modification

#### Source Description and Location

Source Name:	Criterion Catalysts and Technologies, L.P.
Source Location:	1800 East US 12, Michigan City, Indiana 46360
County:	LaPorte
SIC Code:	2819
Operation Permit Renewal No.:	T 091-21619-00053
Operation Permit Issuance Date:	December 13, 2007
Significant Permit Modification No.:	091-26255-00053
Permit Reviewer:	Joe Sachse

#### Public Notice Information

On August 25, 2008, the Office of Air Quality (OAQ) had a notice published in The News Dispatch in Michigan City, in Laporte County, Indiana, stating that the Criterion Catalysts and Technologies, L.P. had applied for a significant modification to their Part 70 Operating Permit Renewal issued on December 13, 2007. 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.

#### Comments Received

On September 11, 2008, OAQ received comments from David R. Jordan of Environmental Resources Management, on behalf of Criterion Catalysts and Technologies, L.P. The comments are summarized in the subsequent pages, with IDEM's corresponding responses.

The IDEM does not amend the Technical Support Document (TSD). The TSD is maintained to document the original review. This addendum to the TSD is used to document responses to comments and changes made from the time the permit was drafted until a final decision is made.

The summary of the comments and IDEM, OAQ responses, including changes to the permit (language deleted is shown in ~~strikeout~~ and language added is shown in **bold**) are as follows:

**Comment 1:**

The wording for Condition A.1 was modified to note the fact that LaPorte County is now attainment for ozone. In doing so, however, the phrase "Nonattainment for 8-hour ozone standard" was simply removed from the wording, which left the language as "Attainment for all other criteria pollutants". The word 'other' should be removed, as it implies that the county is nonattainment for something.

**IDEM Response 1:**

The word 'other' has been removed.

...

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

---

The Permittee owns and operates a stationary alumina powder and specialty chemical production plant.

...

Source Location Status:	Attainment for all <del>other</del> criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

**Comment 2:**

The emission unit SD-3 was removed from the source description in Section D.1. Condition A.2 includes this unit as item (n); however it does not appear in the source description for Section D.1. The TSD shows the removal of emission unit SD-3 on page 8 of the TSD. Emission unit SD-3 should be added to the source description for Section D.1. In the TSD, there is proposed language at the bottom of page 8 of the TSD indicating that a new item (c) was to be added to Condition D.1.1 which modified the particulate matter and PM<sub>10</sub> emission rates for Dryer SD-3. The language contained in the TSD, however, does not appear in the permit itself. The permit should be corrected to include this.

**IDEM Response 2:**

The emission unit SD-3 is listed under Section A.2; however it is not listed under Section D.1 because it is considered an insignificant activity (326 IAC 2-7-1(21) with no applicable requirements under Section D.1. Condition D.1.1(c) of the permit is correct; it contains the condition for the bulk loading process identified as P-BLR which was included in Operation Permit No.: T 091-2619-00053 as Condition D.1.1(d). In addition, the table under Condition D.1.2 of the permit has been further revised to remove the insignificant activity, SD-3, as follows :

...

(a) D.1.2 Particulate Emissions [326 IAC 6-3-2]

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Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Process), the allowable particulate emission rate from each of the facilities listed below shall be limited as shown in the following table:

Unit ID	Allowable Emission Rate (lb/ton throughput)
P-SB1 (E-26)	1.78
P-SB2 (E-52)	1.78
P-SILOS	1.97
S-DBE (EX-422)	3.03
S-DBW (EX-423)	3.03
P-SAR1 (F-31)	1.89
P-SAR2 (F-32)	1.89
P-ASR1 (F-34)	1.87
P-ASR2 (F-37)	1.87
P-BBL (T-159)	5.30
P-BL (E-190)	1.90
S-MIX (EX-421)	3.34
S-C1 (EX-579)	3.63
S-C2 (EX-579)	3.63
S-PT (EX-104)	6.48
ADC#1 (EX-631-023)	6.95
S-D1 (EX-300-23)	2.73
<del>SD-3 (FX-300-35K)</del>	<del>2.99</del>
P-BLR (E-239)	1.78

...

**Comment 3:**

In subparagraph (a) of Condition D.1.8, the reference to Condition D.1.6 should be changed to D.1.5, and in subparagraph (b) of Condition D.1.8, the reference to Condition D.1.7 should be changed to D.1.6.

**IDEM Response 3:**

Condition D.1.8 of the permit has been revised accordingly and is shown below:

...

(b) D.1.8 Record Keeping Requirements

- 
- (a) To document compliance with ~~Condition D.1.6~~ **Condition D.1.5**, the Permittee shall maintain a daily record of visible emission notations of the process/control device stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).
  - (b) To document compliance with ~~Condition D.1.7~~ **Condition D.1.6**, the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the process. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).

**Comment 4:**

Condition D.3.4 contains stack testing requirements for the spray dryer, and seems to require testing prior to December 2011 for Operating Scenario 1 regardless of whether Criterion is operating under Operating Scenario 1 or not. Criterion requests that this condition be reworded to indicate that testing would not be required if Criterion continued to operate under Operating Scenario 2.

**IDEM Response 3:**

Condition D.3.4 of the permit has been revised accordingly and is shown below:

...

(c) D.3.4 Testing Requirements [326 IAC 2-7-6(1)-(6)][326 IAC 2-1.1-11][326 IAC 2-2]

In order to demonstrate compliance with Condition D.3.1, the Permittee shall perform PM and PM<sub>10</sub> testing for the spray dryer identified as P-SD (E-110), utilizing methods as approved by the Commissioner. PM<sub>10</sub> includes filterable and condensable PM<sub>10</sub>. Testing shall be conducted in accordance with Section C- Performance Testing.

The Permittee is required to conduct testing under both Alternative Operating Scenario 1 and Alternative Operating Scenario 2. The PM and PM<sub>10</sub> testing for each alternative operating scenario shall be conducted as follows:

- (a) Alternative Operating Scenario 1 (using the three (3) baghouses to control particulate emissions):

The Permittee shall conduct testing prior to December 2011. **In the event that Criterion is operating under Alternate Operating Scenario 2 in December 2011, such testing shall be performed within 180 days of commencing operation under Alternate Operating Scenario 1 after this date.** This test shall be repeated at least once every five (5) years from the date of the valid compliance demonstration.

<b>IDEM Contact</b>
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Questions regarding this proposed permit can be directed to Joe Sachse at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5378 toll free at 1-800-451-6027 extension 4-5378.

## Indiana Department of Environmental Management Office of Air Quality

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

#### Source Description and Location

Source Name:	Criterion Catalysts and Technologies, L.P.
Source Location:	1800 East US 12, Michigan City, Indiana 46360
County:	LaPorte
SIC Code:	2819
Operation Permit Renewal No.:	T 091-21619-00053
Operation Permit Issuance Date:	December 13, 2007
Significant Permit Modification No.:	091-26255-00053
Permit Reviewer:	Joe Sachse

#### Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T 091-21619-00053 on December 13, 2007. After this renewal permit, no approval has been issued.

#### County Attainment Status

The source is located in LaPorte County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective July 19, 2007, 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 November 15, 1990, for the 1-hour standard which was revoked effective June 15, 2005.

Unclassifiable or attainment effective April 5, 2005, for PM<sub>2.5</sub>.

(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, and St. Joseph County 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 County as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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. LaPorte 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) **PM<sub>2.5</sub>**  
 LaPorte County has been classified as attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions.
- (c) **Other Criteria Pollutants**  
 LaPorte County has been classified as attainment or unclassifiable in Indiana for SO<sub>2</sub>, CO, PM<sub>10</sub>, NO<sub>2</sub>, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Since this source is classified as a chemical process plant, it is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (e) **Fugitive Emissions**  
 Since this type of operation is in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are counted toward the determination of PSD and Emission Offset applicability.

<b>Source Status</b>
----------------------

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 (ton/yr)</b>
PM	394
PM <sub>10</sub>	349
SO <sub>2</sub>	8.03
VOC	18.5
CO	51.4
NO <sub>x</sub>	1099

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 100 tons per year or more, and it is one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based upon Part 70 Operating Permit Renewal No.: T 091-21619-00053.

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 (ton/yr)</b>
Single HAP	< 10
Combination HAPs	< 25

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).

### Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a permit modification application, submitted by Criterion Catalysts and Technologies, L.P. on March 13, 2008, relating to incorporation of an alternative monitoring plan (AMP) for the purpose of demonstrating ongoing compliance with applicable emission limits to that found in the requirements of New Source Performance Standard (NSPS) Part 60, Subpart UUU (Standards of Performance for Calciners and Dryers in Mineral Industries). The following is the modified emission unit and pollution control devices:

One (1) natural gas-fired spray dryer, constructed in 1956 and modified in 1995 and 2006, identified as P-SD (E-110), with a burner (E-336) rated at 80 MMBtu/hr, using a cyclone for product recovery (integral to the process), and exhausting to three (3) baghouses, identified as E-357A, E-357B, and E-357C, followed by a non-Venturi type wet scrubber, identified as T-107. Particulate emissions are controlled using two operating scenarios. In Alternative Operating Scenario 1, particulate is controlled using the three (3) baghouses in parallel (integral to the process). In Alternative Operating Scenario 2, particulate is controlled using the three baghouses in parallel (integral to the process) and the non-Venturi type wet scrubber. In both operating scenarios, emissions exhaust through stack B. This is an affected unit under 40 CFR 60, Subpart UUU.

The Permittee requests approval to continuously monitor the ratio of total liquid (or scrubbing liquid) flow rate to the scrubber to the gas flow rate entering or exiting the scrubber (flue gas treated), in lieu of, to continuously monitor the gas phase pressure drop across the scrubber. In a letter dated September 6, 2007 (see permit Attachment B), the U.S. EPA approved the alternative continuous monitoring system (CMS) plan for the scrubber on the spray dryer. See the Federal Rule Applicability Determination Section for a description of the CMS plan.

In addition, the Permittee has requested that the one (1) natural gas-fired high temperature dryer, constructed in 1996 and modified in 2000, identified as SEACAP dryer (EX-496), be removed from the permit because it was shut down and removed from the source in early March 2008.

### Enforcement Issues

There are no pending enforcement actions.

### 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.”

There is no increase in the potential to emit of any regulated pollutants associated with this modification.

This modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because the modification incorporates a significant change in existing monitoring Part 70 permit terms or conditions.

### Federal Rule Applicability Determination

The following federal rules are applicable to the source:

The natural gas-fired spray dryer, identified as P-SD (E-110), is subject to the New Source Performance Standards for Calciners and Dryers in Mineral Industries (40 CFR 60, Subpart UUU), which is incorporated by reference as 326 IAC 12.

Nonapplicable portions of the NSPS are not included in the permit. The natural gas-fired spray dryer, identified as P-SD (E-110), is subject to the following portions of Subpart UUU.

- (1) 40 CFR 60.730(a) and (c);
- (2) 40 CFR 60.731;
- (3) 40 CFR 60.732;
- (4) 40 CFR 60.733;
- (5) 40 CFR 60.734(a) and (d);
- (6) 40 CFR 60.735;
- (7) 40 CFR 60.736; and
- (8) 40 CFR 60.737.

This permit modification incorporates an alternative monitoring plan (AMP) to 40 CFR 60.734(d).

The Permittee requests approval to continuously monitor the gas flow rate entering or exiting the non-Venturi type wet scrubber, in lieu of, to continuously monitor the gas phase pressure drop across the scrubber. Although the source currently relies on the three (3) baghouses to meet the particulate matter emission standard and a continuous opacity monitoring system to meet the requirements of Subpart UUU, the source has applied to incorporate the non-Venturi type wet scrubber into its compliance approach to gain greater operational flexibility. For subject dryers equipped with wet scrubbers, the monitoring provisions of 40 CFR 60.743(d) require owners or operators to install, calibrate, maintain, and operate monitoring devices that continuously measure and record the pressure drop of the gas stream through the scrubber and the scrubber liquid flow rate.

In a letter dated September 6, 2007 (see permit Attachment B), the U.S. EPA agreed with the source that the gas phase pressure drop was not an appropriate continuous monitoring parameter for a wet scrubber that does not use a Venturi design for particulate matter emission control. In addition, U.S. EPA stated that it believes that the ratio of scrubbing liquid to flue gas treated (liquid to gas ratio) is an appropriate monitoring parameter for a wet scrubber. Pursuant to 40 CFR 60.13, the U.S. EPA approved the following alternative continuous monitoring system (CMS) plan for the wet scrubber, which satisfies the requirements of 40 CFR 60.734(d):

- (1) The source shall install, operate, and maintain continuous monitoring system(s) to measure and record the ratio of total liquid (or scrubbing liquid) flow rate to the scrubber to the gas flow rate entering or exiting the scrubber (flue gas treated). This ratio of scrubbing liquid to flue gas treated is the "liquid-to-gas ratio." The continuous monitoring system(s) must be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. The monitoring system(s) which are contained in the applicable Performance Specifications of Appendix B of Part 60 must be used. 40 CFR 60.13 requires, among other things, that each CMS complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. The CMS must determine and record the hourly average liquid-to-gas ratio of all recorded readings from four or more data points equally spaced over each one-hour period. The owner or operator must determine and record once each day, from the recordings of the continuous monitoring devise(s), an arithmetic average over a two-hour period of the liquid-to-gas ratio.

- (2) Within 180 days of startup of the wet scrubber, the source shall conduct a performance test for particulate matter at the spray dryer in accordance with 40 CFR 60.8. The performance test shall consist of three (3) test runs and the sampling time of each test run must be at least two hours. The source shall notify U.S. EPA at least 30 days prior to conducting the performance test to allow U.S. EPA to review the protocol and to have an observer present during the test. During the performance testing, and using the continuous monitoring system(s), the source shall measure and record the liquid-to-gas ratio at least every 15 minutes during the entire performance test and record the average liquid-to-gas ratio during each test run and the arithmetic average liquid-to-gas ratio of the three (3) test runs. The operating limit established during the performance test must represent the conditions in existence when the wet scrubber and baghouses are being properly operated and maintained to meet the emission limitation.
- (3) Pursuant to 326 IAC 2-7-5(3)(B)(ii), the source shall maintain records of the ratio of scrubbing liquid to flue gas treated at the facility for at least five (5) years.
- (4) The source shall submit reports of the exceedance of the liquid-to-gas ratio semi-annually to U.S. EPA and IDEM as required by 40 CFR 60.735. Exceedances are defined as any two (2) hour period when the average liquid-to-gas ratio is less than 80 percent of the arithmetic average liquid-to-gas ratio of the three (3) test runs of the most recent performance test that demonstrated compliance with the particulate matter standard in 40 CFR Part 60, Subpart UUU.

Pursuant to Condition (2) above (and Condition D.3.3(b) of the source's Title V Permit), the source performed compliance testing on the wet scrubber exhaust from the spray dryer. As a result of the fact that the spray dryer is utilized to manufacture a variety of products, the source performed two different tests (on different products) for the purpose of evaluating scrubber performance, as follows:

<b>Date</b>	<b>Product</b>	<b>Representative Characteristic</b>	<b>2-hr Avg. Liquid-to-Gas Ratio (gal/min/lb/hr of air flow)</b>	<b>Outlet PM Emission Rate (gr/dscf)</b>
November 6 & 7, 2007	WPA	Highest Mass Loading to P-SD	0.0051	0.016
December 21, 2007	SFC	Highest Particulate Loading to Scrubber	0.0069	0.007

Data from the November 2007 test should be the basis for the liquid-to-gas ratio used to define an exceedance under this permit for the following reasons:

- (1) The liquid-to-gas ratio obtained during the November test was lower than the liquid-to-gas ratio obtained during the December test;
- (2) WPA represents the highest volume product produced at the source;
- (3) The November 2007 test results were well below the allowable grain loading limit of 0.025 gr/dscf; and
- (4) The grain loading measured during the December 2007 test was less than 30% of the allowable limit, indicating that the liquid-to-gas ratio was higher than necessary to meet the allowable grain-loading limit of 0.025 gr/dscf.

Therefore, the average value for the November 2007 test shall be used as the basis for defining an exceedance under this permit. The two-hour average liquid-to-gas ratio shall be greater than or equal to 0.0041 gallons per minute per pound per hour of air flow (80% of 0.0051).

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

Changes to the compliance determination and monitoring requirements are discussed in the Description of Proposed Modification and the Federal Rule Applicability Determination sections and detailed in the Proposed Changes section of this document.

### Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T 091-21619-00053. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

1. Sections A.2 and D.1 have been revised to remove the SEACAP dryer, with renumbering of the subsections.
2. The last sentence of the Condition B.9 has been revised so that the language in 326 IAC 2-7-6(5) matches the language in the permit: The annual compliance certification date was changed from April 15 to July 1.
3. Condition C.18 - General Record Keeping Requirements has been updated for clarification purposes.
4. Section D.3 has been modified to incorporate an alternative monitoring plan (AMP) for the purpose of demonstrating ongoing compliance with applicable emission limits to that found in the requirements of New Source Performance Standard (NSPS) Part 60, Subpart UUU (Standards of Performance for Calcinars and Dryers in Mineral Industries). The applicable portions of NSPS 40 CFR Part 60, Subpart UUU are now listed in Section E.1. NSPS 40 CFR Part 60, Subpart UUU is included as Attachment A. The U.S. EPA approval letter concerning the alternative monitoring plan (AMP) is included as Attachment B.

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

The Permittee owns and operates a stationary alumina powder and specialty chemical production plant.

...

Source Location Status:	<del>Nonattainment for 8-hour ozone standard;</del> Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD <del>and Emission Offset Rules;</del> Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

...

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

---

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

...

- (n) ~~One (1) natural gas fired high temperature dryer, identified as SEACAP dryer (EX-496), constructed in 1996 and modified in 2000, rated at 1.38 MMBtu/hr, using one (1) baghouse for particulate control, and exhausting to stack P3.~~

...

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

---

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

...

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2][326 IAC 2-3]

---

...

- (c) If there is **a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit or at a source with Plant-wide Applicability Limitation (PAL), other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:**

...

- (d) **If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:**

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

~~(3)~~ **(2)** Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

...

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

...

- ~~(n) One (1) natural gas fired high temperature dryer, identified as SEACAP dryer (EX-496), constructed in 1996 and modified in 2000, rated at 1.38 MMBtu/hr, using one (1) baghouse for particulate control, and exhausting to stack P3.~~
- ~~(e) One (1) natural gas fired low temperature dryer, identified as SD-3 (EX-300-35K), constructed in 1965 and modified in 2000, rated at 5 MMBtu/hr, using no controls, and exhausting to stack P2.~~
- ~~(†) (n) One (1) bulk loading process containing one rail car loading system identified as P-BLR (E-239), constructed in 2006, exhausting to stack GG and equipped with one (1) baghouse (E-190) for particulate control.~~

(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 PSD Minor Limit [326 IAC 2-2]

...

- ~~(b) As revised by this Title V Renewal permit: The fourteen (14) silo segments (E-195, E-196, E-197, E-198, E-216, E-217, E-199, E-200, E-204, E-201, E-202, E-193, E203, and E-194) shall be subject to the following:~~

...

- ~~(c) Pursuant to Minor Source Modification 091-11692-00053, issued March 7, 2000, and as revised by this Title V Renewal permit:
  - ~~(1) The emissions of PM from the SEACAP dryer shall be limited to less than 5.6 pounds per hour.~~
  - ~~(2) The emissions of PM<sub>10</sub> from the SEACAP dryer shall be limited to less than 3.3 pounds per hour.~~
  - ~~(3) The emissions of PM and PM<sub>10</sub> from the SD-3 dryer shall be limited to less than 0.1 pounds per hour.~~~~

~~Compliance with these limits renders the requirements of 326 IAC 2-2 (PSD) not applicable to the 2000 modification under MSM 091-11692-00053.~~

- ~~(c) The SD-3 dryer shall be subject to the following:
  - ~~(1) The PM emissions from the SD-3 dryer shall be less than 5.7 pounds per hour.~~
  - ~~(2) The PM<sub>10</sub> emissions from the SD-3 dryer shall be less than 3.42 pounds per hour.~~~~

~~Compliance with these limits renders the requirements of 326 IAC 2-2 (PSD) not applicable to the 2000 modification.~~

...

D.1.2 Particulate Emissions [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Process), the allowable particulate emission rate from each of the facilities listed below shall be limited as shown in the following table:

Unit ID	Allowable Emission Rate (lb/ton throughput)
P-SB1 (E-26)	1.78
P-SB2 (E-52)	1.78
P-SILOS	1.97
S-DBE (EX-422)	3.03
S-DBW (EX-423)	3.03
P-SAR1 (F-31)	1.89
P-SAR2 (F-32)	1.89
P-ASR1 (F-34)	1.87
P-ASR2 (F-37)	1.87
P-BBL (T-159)	5.30
P-BL (E-190)	1.90
S-MIX (EX-421)	3.34
S-C1 (EX-579)	3.63
S-C2 (EX-579)	3.63
S-PT (EX-104)	6.48
ADC#1 (EX-631-023)	6.95
S-D1 (EX-300-23)	2.73
<del>SEACAP dryer (EX-496)</del>	<del>3.40</del>
SD-3 (FX-300-35K)	2.99
P-BLR (E-239)	1.78

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for S-C1, S-C2, P-SB1, P-SB2, ~~SEACAP~~, P-BBL, P-BL, and P-BLR and their control devices.

**Compliance Determination Requirements**

D.1.4 Particulate Controls

(a) In order to comply with Conditions D.1.1 and D.1.2, each baghouse associated with the following processes shall be in operation and control emissions at all times that the process is in operation:

...

(10) Bag loadout, screener, fines grinder system and other particulate matter processes identified as ADC#1 (EX-631-023); **and**

~~(11)~~ One (1) high temperature dryer identified as ~~SEACAP~~ dryer (EX-529); and

~~(12)~~**(11)** One (1) bulk loading process containing one rail car loading system, identified as P-BLR (E-239).

...

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

~~The Permittee shall perform PM and PM10 testing for the spray dryer identified SEACAP dryer within one hundred eighty days (180) after issuance of this permit, or within sixty (60) days of the resumption of operations at this emission unit, whichever is later, in order to demonstrate compliance with Conditions D.1.1 and D.1.2, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the valid compliance demonstration. PM10 includes filterable and condensable PM10. Testing shall be conducted in accordance with Section C - Performance Testing.~~

...

D.1.7.6 Parametric Monitoring [40 CFR 64]

The Permittee shall record the pressure drop across the baghouses used in conjunction with the processes identified as S-C1, S-C2, P-SB1, P-SB2, SEACAP, P-BBL, P-BL, and P-BLR at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouses is outside the normal range of 1.0 to 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit. The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

...

**SECTION D.3**

**FACILITY OPERATION CONDITIONS**

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

- (a) One (1) natural gas-fired spray dryer, identified as P-SD (E-110), constructed in 1956 and modified in 1995 and 2006, with a burner (E-336) rated at 80MMBtu/hr, and using a cyclone for product recovery (integral to the process), and exhausting to the baghouses (E-357A, E-357B, E-357C). Particulate emissions are controlled using two operating scenarios. In Alternative Operating Scenario 1, particulate is controlled using three (3) baghouses (E-357A, E-357B, E-357C) in parallel (integral to the process). In Alternative Operating Scenario 2, particulate is controlled using three baghouses (E-357A, E-357B, E-357C) in parallel (integral to the process) and a wet scrubber (T-107). In both operating scenarios, emissions exhaust through stack B. This is an affected unit under 40 CFR 60, Subpart UUU.

(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.3.2 Monitoring Requirements [326 IAC 12]

- (a) When operating under Alternative Operating Scenario 1, the Permittee shall monitor emissions pursuant to 40 CFR 60.734(a).
- ~~(b) When operating under Alternative Operating Scenario 2, the Permittee shall monitor emissions pursuant to 40 CFR 60.734(d).~~

- (b) When operating under Alternative Operating Scenario 2, the Permittee shall install, operate, and maintain continuous monitoring system(s) (CMS) to measure and record the ratio of total liquid (or scrubbing liquid) flow rate to the scrubber to the gas flow rate entering or exiting the scrubber (flue gas treated). This ratio of scrubbing liquid to flue gas treated is the "liquid-to-gas ratio." The CMS must be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. The monitoring system(s) which are contained in the applicable Performance Specifications of Appendix B of Part 60 must be used. 40 CFR 60.13 requires, among other things, that each CMS complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period.**

...

**D.3.4 Testing Requirements [326 IAC 2-7-6(1)-(6)][326 IAC 2-1.1-11][326 IAC 2-2]**

In order to demonstrate compliance with Condition D.3.1, the Permittee shall perform PM and PM10 testing for the spray dryer identified as P-SD (E-110), utilizing methods as approved by the Commissioner. PM10 includes filterable and condensable PM10. Testing shall be conducted in accordance with Section C- Performance Testing.

The Permittee is required to conduct testing under both Alternative Operating Scenario 1 and Alternative Operating Scenario 2. The PM and PM10 testing for each alternative operating scenario shall be conducted as follows:

- (a) Alternative Operating Scenario 1 (using the three (3) baghouses to control particulate emissions):

The Permittee shall conduct testing prior to December 2011. This test shall be repeated at least once every five (5) years from the date of the valid compliance demonstration.

- ~~(b) Alternative Operating Scenario 2 (using the wet scrubber to control particulate emissions):  
The Permittee shall conduct testing within sixty (60) days of beginning operations using this operating scenario. This test shall be repeated at least once every five (5) years from the date of the valid compliance demonstration.~~

- (b) Alternative Operating Scenario 2 (also using the wet scrubber to control particulate emissions):**

**Within 180 days of startup of the wet scrubber, the source shall conduct a performance test for particulate matter at the spray dryer in accordance with 40 CFR 60.8. The performance test shall consist of three (3) test runs and the sampling time of each test run must be at least two hours. The source shall notify U.S. EPA at least 30 days prior to conducting the performance test to allow U.S. EPA to review the protocol and to have an observer present during the test. During the performance testing, and using the continuous monitoring system(s) (CMS), the source shall measure and record the liquid-to-gas ratio at least every 15 minutes during the entire performance test and record the average liquid-to-gas ratio during each test run and the arithmetic average liquid-to-gas ratio of the three (3) test runs. The operating limit established during the performance test must represent the conditions in existence when the wet scrubber and baghouses are being properly operated and maintained to meet the emission limitation. This test shall be repeated at least once every five (5) years from the date of the valid compliance demonstration. Compliance testing performed on November 6-7, 2007 determined the arithmetic average liquid-to-gas ratio of the three (3) test runs to be 0.0051 gallons per minute per pound per hour of air flow.**

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

### D.3.5 Record Keeping Requirements [326 IAC 12]

- (a) In order to demonstrate compliance with Condition D.3.3, the Permittee shall keep a daily record of the operating scenario used to control particulate emissions from the dryer.
- (b) **In order to demonstrate compliance with Condition D.3.2(b), the continuous monitoring system(s) (CMS) must determine and record the hourly average liquid-to-gas ratio of all recorded readings from four or more data points equally spaced over each one-hour period. The Permittee shall determine and record once each day, from the recordings of the continuous monitoring device(s), an arithmetic average over a two-hour period of the liquid-to-gas ratio.**
- (c) **Pursuant to 326 IAC 2-7-5(3)(B)(ii), The Permittee shall maintain the records of the ratio of scrubbing liquid to flue gas treated at the facility for at least five (5) years.**
- (b) (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### D.3.6 Reporting Requirements

In order to demonstrate compliance with Conditions D.3.2(b) and D.3.5(b), the Permittee shall submit reports of the exceedance of the liquid-to-gas ratio semi-annually to U.S. EPA and IDEM as required by 40 CFR 60.735. Exceedances are defined as any two (2) hour period when the average liquid-to-gas ratio is less than 80 percent of the arithmetic average liquid-to-gas ratio of the three (3) test runs of the most recent performance test that demonstrated compliance with the particulate matter standard in 40 CFR Part 60, Subpart UUU. Compliance testing performed on November 6-7, 2007, determined that the two-hour average liquid-to-gas ratio be maintained at or above 0.0041 gallons per minute per pound per hour of air flow.

### ~~New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]~~

#### ~~D.3.6 General Provisions Relating to NSPS [326 IAC 12-1-1] [40 CFR Part 60, Subpart A]~~

~~Pursuant to 40 CFR Part 60, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A—General Provisions, which are incorporated by reference as 326 IAC 12-1-1, for the one (1) spray dryer identified as P-SD (E-110) as specified in Appendix A of 40 CFR Part 60, Subpart UUU in accordance with schedule in 40 CFR Part 60, Subpart UUU.~~

#### ~~D.3.7 New Source Performance Standards for Calciners and Dryers in Mineral Industries [40 CFR Part 60, Subpart UUU] [326 IAC 12]~~

~~Pursuant to 40 CFR Part 60, Subpart UUU, the one (1) spray dryer identified as P-SD (E-110) shall comply with the following provisions:~~

### ~~Subpart UUU—Standards of Performance for Calciners and Dryers in Mineral Industries~~

#### ~~§ 60.730—Applicability and designation of affected facility.~~

~~(a) The affected facility to which the provisions of this subpart apply is each calciner and dryer at a mineral processing plant. Feed and product conveyors are not considered part of the affected facility. For the brick and related clay products industry, only the calcining and drying of raw materials prior to firing of the brick are covered.~~

~~(c) The owner or operator of any facility under paragraph (a) of this section that commences construction, modification, or reconstruction after April 23, 1986, is subject to the requirements of this subpart.~~

#### ~~§ 60.731—Definitions.~~

~~As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.~~

~~Calcinor means the equipment used to remove combined (chemically bound) water and/or gases from~~

~~mineral material through direct or indirect heating. This definition includes expansion furnaces and multiple hearth furnaces.~~

~~Control device means the air pollution control equipment used to reduce particulate matter emissions released to the atmosphere from one or more affected facilities.~~

~~Dryer means the equipment used to remove uncombined (free) water from mineral material through direct or indirect heating.~~

~~Installed in series means a calciner and dryer installed such that the exhaust gases from one flow through the other and then the combined exhaust gases are discharged to the atmosphere.~~

~~Mineral processing plant means any facility that processes or produces any of the following minerals, their concentrates or any mixture of which the majority (>50 percent) is any of the following minerals or a combination of these minerals: alumina, ball clay, bentonite, diatomite, feldspar, fire clay, fuller's earth, gypsum, industrial sand, kaolin, lightweight aggregate, magnesium compounds, perlite, roofing granules, talc, titanium dioxide, and vermiculite.~~

#### **~~§ 60.732—Standards for particulate matter.~~**

~~Each owner or operator of any affected facility that is subject to the requirements of this subpart shall comply with the emission limitations set forth in this section on and after the date on which the initial performance test required by §60.8 is completed, but not later than 180 days after the initial startup, whichever date comes first. No emissions shall be discharged into the atmosphere from any affected facility that:~~

~~(a) Contains particulate matter in excess of 0.092 gram per dry standard cubic meter (g/dscm) [0.040 grain per dry standard cubic foot (gr/dscf)] for calciners and for calciners and dryers installed in series and in excess of 0.057 g/dscm (0.025 gr/dscf) for dryers; and~~

~~(b) Exhibits greater than 10 percent opacity, unless the emissions are discharged from an affected facility using a wet scrubbing control device.~~

~~[57 FR 44503, Sept. 28, 1992, as amended at 65 FR 61778, Oct. 17, 2000]~~

#### **~~§ 60.733—Reconstruction.~~**

~~The cost of replacement of equipment subject to high temperatures and abrasion on processing equipment shall not be considered in calculating either the "fixed capital cost of the new components" or the "fixed capital cost that would be required to construct a comparable new facility" under §60.15. Calciner and dryer equipment subject to high temperatures and abrasion are: end seals, flights, and refractory lining.~~

#### **~~§ 60.734—Monitoring of emissions and operations.~~**

~~(a) With the exception of the process units described in paragraphs (b), (c), and (d) of this section, the owner or operator of an affected facility subject to the provisions of this subpart who uses a dry control device to comply with the mass emission standard shall install, calibrate, maintain, and operate a continuous monitoring system to measure and record the opacity of emissions discharged into the atmosphere from the control device.~~

~~(d) The owner or operator of an affected facility subject to the provisions of this subpart who uses a wet scrubber to comply with the mass emission standard for any affected facility shall install, calibrate, maintain, and operate monitoring devices that continuously measure and record the pressure loss of the gas stream through the scrubber and the scrubbing liquid flow rate to the scrubber. The pressure loss monitoring device must be certified by the manufacturer to be accurate within 5 percent of water column gauge pressure at the level of operation. The liquid flow rate monitoring device must be certified by the manufacturer to be accurate within 5 percent of design scrubbing liquid flow rate.~~

#### **~~§ 60.735—Recordkeeping and reporting requirements.~~**

~~(a) Records of the measurements required in §60.734 of this subpart shall be retained for at least 2 years.~~

~~(b) Each owner or operator who uses a wet scrubber to comply with §60.732 shall determine and record once each day, from the recordings of the monitoring devices in §60.734(d), an arithmetic average over a 2-hour period of both the change in pressure of the gas stream across the scrubber and the flowrate of the scrubbing liquid.~~

~~(c) Each owner or operator shall submit written reports semiannually of exceedances of control device operating parameters required to be monitored by §60.734 of this subpart. For the purpose of these reports, exceedances are defined as follows:~~

~~(1) All 6 minute periods during which the average opacity from dry control devices is greater than 10 percent; or~~

~~(2) Any daily 2-hour average of the wet scrubber pressure drop determined as described in §60.735(b) that is less than 90 percent of the average value recorded according to §60.736(c) during the most recent performance test that demonstrated compliance with the particulate matter standard; or~~

~~(3) Each daily wet scrubber liquid flow rate recorded as described in §60.735(b) that is less than 80 percent or greater than 120 percent of the average value recorded according to §60.736(c) during the most recent performance test that demonstrated compliance with the particulate matter standard.~~

~~(d) The requirements of this section remain in force until and unless the Agency, in delegating enforcement authority to a State under section 111(c) of the Clean Air Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such State. In that event, affected facilities within the State will be relieved of the obligation to comply with this section provided that they comply with the requirements established by the State.~~

[57 FR 44503, Sept. 28, 1992, as amended at 58 FR 40591, July 29, 1993]

**~~§ 60.736—Test methods and procedures.~~**

~~(a) In conducting the performance tests required in §60.8, the owner or operator shall use the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in §60.8(b).~~

~~(b) The owner or operator shall determine compliance with the particulate matter standards in §60.732 as follows:~~

~~(1) Method 5 shall be used to determine the particulate matter concentration. The sampling time and volume for each test run shall be at least 2 hours and 1.70 dscm.~~

~~(2) Method 9 and the procedures in §60.11 shall be used to determine opacity from stack emissions.~~

~~(c) During the initial performance test of a wet scrubber, the owner or operator shall use the monitoring devices of §60.734(d) to determine the average change in pressure of the gas stream across the scrubber and the average flowrate of the scrubber liquid during each of the particulate matter runs. The arithmetic averages of the three runs shall be used as the baseline average values for the purposes of §60.735(c).~~

**~~§ 60.737—Delegation of authority.~~**

~~(a) In delegating implementation and enforcement authority to a State under section 111(c) of the Act, the authorities contained in paragraph (b) of this section shall be retained by the Administrator and not transferred to a State.~~

~~(b) Authorities which will not be delegated to States: No restrictions.~~

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**SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

- (a) One (1) natural gas-fired spray dryer, constructed in 1956 and modified in 1995 and 2006, identified as P-SD (E-110), with a burner (E-336) rated at 80MMBtu/hr, and using a cyclone for product recovery (integral to the process), and exhausting to the baghouses (E-357A, E-357B, E-357C). Particulate emissions are controlled using two operating scenarios. In Alternative Operating Scenario 1, particulate is controlled using three (3) baghouses (E-357A, E-357B, E-357C) in parallel (integral to the process). In Alternative Operating Scenario 2, particulate is controlled using three baghouses (E-357A, E-357B, E-357C) in parallel (integral to the process) and a wet scrubber (T-107). In both operating scenarios, emissions exhaust through stack B.

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

**New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]**

**E.1.1 General Provisions Relating to New Source Performance Standards Under 40 CFR Part 60 [326 IAC 12-1][40 CFR Part 60, Subpart A]**

- (a) The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1-1, apply to the natural gas-fired spray dryer, identified as P-SD (E-110), except when otherwise specified in 40 CFR Part 60, Subpart UUU.
- (b) Pursuant to 40 CFR 60.7, the Permittee shall submit all of the required notifications and reports to:

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

**E.1.2 New Source Performance Standards for Calciners and Dryers in Mineral Industries [40 CFR Part 60, Subpart UUU][326 IAC 12]**

Pursuant to 40 CFR Part 60, Subpart UUU, the Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart UUU (included as Attachment A), which are incorporated by reference as 326 IAC 12, for the natural gas-fired spray dryer, identified as P-SD (E-110):

- (1) 40 CFR 60.730(a) and (c);
- (2) 40 CFR 60.731;
- (3) 40 CFR 60.732;
- (4) 40 CFR 60.733;
- (5) 40 CFR 60.734(a) and (d);
- (6) 40 CFR 60.735;
- (7) 40 CFR 60.736; and
- (8) 40 CFR 60.737.

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

**Part 70 Semi-Annual Report  
40 CFR Part 60, Subpart UUU Semi-Annual Report**

**Source Name:** Criterion Catalysts and Technologies, L.P.  
**Source Address:** 1800 East U.S. 12, Michigan City, Indiana 46360  
**Mailing Address:** 1800 East U.S. 12, Michigan City, Indiana 46360  
**Permit Renewal No.:** T 091-21619-00053  
**SPM No.:** 091-26255-00053  
**Facility:** Natural gas-fired spray dryer, identified as P-SD (E-110)  
**Parameter:** Alternative Operating Scenario 2 (also using the wet scrubber to control particulate emissions)  
**Limit:** Two-hour average liquid-to-gas ratio greater than or equal to 0.0041 gallons per minute per pound per hour of air flow

**Year:** \_\_\_\_\_

Month	# of Deviations	Cumulative # of Deviations
Month 1		
Month 2		
Month 3		
Month 4		
Month 5		
Month 6		

Deviation/s occurred on (date): \_\_\_\_\_

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

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

**Conclusion and Recommendation**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification. The staff recommends to the Commissioner that this Part 70 Significant Permit Modification be approved.