



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

TO: Interested Parties / Applicant

DATE: August 12, 2010

RE: Nature's Fuel / 085-28516-00115

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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August 12, 2010

Mr. Glenn Johnson
Nature's Fuel
421 E. Cook Road, Suite 400
Fort Wayne, IN 46825

Re: 085-28516-00115
First Significant Revision to
F085-26494-00115

Dear Mr. Johnson

Nature's Fuel was issued a Federally Enforceable State Operating Permit (FESOP) No. F085-26494-00115 on September 10, 2008 for a stationary source that converts wood and wood waste into renewable energy located at 510 East Main Street, Atwood, Indiana 46502. On September 30, 2009, the Office of Air Quality (OAQ) received an application from the source requesting the ability use producer gas, bio gas, or No. 2 fuel oil in the combustion box. In addition, the source has requested that IDEM revise the permit to clarify that the feedstock will not always consist of 100 percent wood and wood waste and that the pyrolysis unit is controlled by a baghouse. The source has also applied to construct new bio-oil, No. 2 fuel oil, and diesel storage tanks. Finally, the source has requested to increase the existing VOC emission limit and decrease the existing feedstock throughput limit. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit

revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Brian Williams, of my staff, at 317-234-5375 or 1-800-451-6027, and ask for extension 4-5375.

Sincerely,



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC/BMW

cc: File - Kosciusko County
Kosciusko County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section



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**New Source Construction and Federally Enforceable State
Operating Permit
OFFICE OF AIR QUALITY**

**Nature's Fuel
510 E. Main St.
Atwood, Indiana 46502**

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

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. 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 2-8 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F 085-26494-00115	
Original issued and signed by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 10, 2008 Expiration Date: September 10, 2013

Temporary Operation No.: 085-27010-00115, issued on September 30, 2008.

First Significant Permit Revision No.: 085-28516-00115	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 12, 2010 Expiration Date: September 10, 2013

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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 2-8-3(b)]

The Permittee owns and operates a stationary source to convert wood and wood waste into renewable energy.

Source Address:	510 E. Main St., Atwood, Indiana 46502
General Source Phone Number:	(260) 490-1777
SIC Code:	2869
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules 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 2-8-3(c)(3)]

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

- (a) One (1) enclosed raw material processing area, constructed in 2008, with a maximum capacity of 10 tons per hour, using a baghouse, identified as CE-01, for particulate control, exhausting to stack S1, and consisting of the following:
 - (1) One (1) magnetic separator system;
 - (2) One (1) 6' x 20' feed box;
 - (3) One (1) conveyor system;
 - (4) One (1) rotary trommel screen;
 - (5) One (1) rotary dryer, using heat vented from the pyrolysis unit, and exhausting to stack S1; and
 - (6) One (1) screw auger feeder.
- (b) One (1) combustion box, constructed in 2008, approved for modification in 2010, equipped with a 5.0 MMBtu/hr burner, using natural gas, No. 2 fuel oil, producer gas, or bio-oil to generate heat for the pyrolysis unit.
- (c) One (1) pyrolysis unit, identified as EU-1, approved for construction in 2008, with a maximum capacity of 4.5 tons of feedstock per hour, using a baghouse, identified as CE-01, for particulate control, carbon injection for dioxin and furans control, and lime injection for hydrochloric acid control, and exhausting to stack S1.
- (d) One (1) bio gas condenser.

- (e) One (1) water evaporator utilizing waste heat from the pyrolysis unit.
- (f) One (1) flash evaporator tank, with a maximum capacity of 9,000 gallons.
- (g) One (1) enclosed char load out system, constructed in 2008, using a baghouse, identified as CE-01, for a particulate control, exhausting to stack S1, the system consisting of the following:
 - (1) One (1) char load out auger system;
 - (2) One (1) char chiller system;
 - (3) One (1) magnetic separator system;
 - (4) One (1) char screen system; and
 - (5) One (1) char storage containers, identified as Gayload boxes.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21).

- (a) One (1) bio-oil storage tank, identified as Tank A, constructed in 2009, with a maximum storage capacity of 18,000 gallons.
- (b) Two (2) bio-oil storage tanks, identified as Tanks B and C, constructed in 2009, with a maximum storage capacity of 8,800 gallons, each.
- (c) One (1) bio-oil storage tank, identified as Tank D, constructed in 2009, with a maximum storage capacity of 18,000 gallons.
- (d) One (1) diesel fuel storage tank identified as Tank E, constructed in 2009, with a maximum storage capacity of 1,500 gallons.
- (e) One (1) bio-oil storage tank, identified as Tank F, approved for construction in 2010, with a maximum storage capacity of 12,000 gallons.
- (f) One (1) bio-oil storage tank, identified as Tank G, constructed in 2009, with a maximum storage capacity of 14,000 gallons.
- (g) Four (4) bio-oil storage tanks, identified as Tanks H through K, constructed in 2009, with a maximum storage capacity of 12,000 gallons, each.
- (h) Three (3) bio-oil storage tanks, identified as Tanks L through O, approved for construction in 2010, with a maximum storage capacity of 12,000 gallons, each.
- (i) One (1) bio-oil storage tank identified as T-1, approved for construction in 2010, with a maximum storage capacity of 7,200 gallons.
- (j) One (1) bio-oil storage tank, identified as T-2, approved for construction in 2010, with a maximum storage capacity of 6,200 gallons.
- (k) One (1) bio-oil storage tank, identified as T-3, approved for construction in 2010, with a maximum storage capacity of 1,000 gallons.

- (l) One (1) No. 2 fuel oil storage tank, identified as T-4, constructed in 2009, with a maximum storage capacity of 300 gallons.
- (m) One (1) bio-oil storage tank, identified as T-5, approved for construction in 2010, with a maximum storage capacity of 9,000 gallons.
- (n) Two (2) enclosed submerged filled bio-oil storage tanks, identified as T-6 and T-7, approved for construction in 2010, with a maximum storage capacity of 500 gallons, each.
- (o) Three (3) 7,000 gallon above ground fuel tanks.
- (p) Enclosed raw material storage piles.
- (q) Unpaved roads and parking lots.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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

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

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

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

B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F085-26494-00115, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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.7 Severability [326 IAC 2-8-4(4)]

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

B.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(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. 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.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (i) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
 - (ii) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (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 2-8-4(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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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 and Enforcement 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Northern 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 and Enforcement Branch), or

Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)

Facsimile Number: 317-233-6865

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (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 and Enforcement 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 2-8-4(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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F085-26494-00115 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.18 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. 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 a

certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, 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 2-8 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, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any approval required by 326 IAC 2-8-11.1 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
Permit Administration and Support Section, 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 2-8-15(b) through (d). 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 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) 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 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than 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) 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 2-8-4(3)][326 IAC 2-8-5][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 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

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

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

C.8 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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 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 that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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 2-8-4][326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 and Enforcement 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

- (b) These ERPs shall be submitted for approval to:

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

no later than 180 days from the date on which this source commences operation.

The ERP does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
- (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner 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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (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 except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The

Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, 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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, 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.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-8]:

- (a) One (1) enclosed raw material processing area, constructed in 2008, with a maximum capacity of 10 tons per hour, using a baghouse, identified as CE-01, for particulate control, exhausting to stack S1, and consisting of the following:
 - (1) One (1) magnetic separator system;
 - (2) One (1) 6' x 20' feed box;
 - (3) One (1) conveyor system;
 - (4) One (1) rotary trommel screen;
 - (5) One (1) rotary dryer, using heat vented from the pyrolysis unit, and exhausting to stack S1; and
 - (6) One (1) screw auger feeder.
- (b) One (1) combustion box, constructed in 2008, approved for modification in 2010, equipped with a 5.0 MMBtu/hr burner, using natural gas, No. 2 fuel oil, producer gas, or bio-oil to generate heat for the pyrolysis unit.
- (c) One (1) pyrolysis unit, identified as EU-1, approved for construction in 2008, with a maximum capacity of 4.5 tons of feedstock per hour, using a baghouse, identified as CE-01, for particulate control, carbon injection for dioxin and furans control, and lime injection for hydrochloric acid control, and exhausting to stack S1.
- (d) One (1) bio gas condenser.
- (e) One (1) water evaporator utilizing waste heat from the pyrolysis unit.
- (f) One (1) flash evaporator tank, with a maximum capacity of 9,000 gallons.
- (g) One (1) enclosed char load out system, constructed in 2008, using a baghouse, identified as CE-01, for a particulate control, exhausting to stack S1, the system consisting of the following:
 - (1) One (1) char load out auger system;
 - (2) One (1) char chiller system;
 - (3) One (1) magnetic separator system;
 - (4) One (1) char screen system; and
 - (5) One (1) char storage containers, identified as Gayload boxes.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 FESOP Limits [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following:

- (a) The Permittee shall only pyrolyze char produced onsite and clean wood, which only includes uncoated, unpainted, and untreated wood scrap, sawdust, chips, millings, or shaving, and natural growth materials.
- (b) The annual feedstock throughput rate to the pyrolysis unit shall not exceed 33,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) SO₂ emissions from the pyrolysis unit shall not exceed 3.23 pounds of SO₂ per ton of feedstock processed.
- (d) NO_x emissions from the pyrolysis unit shall not exceed 3.16 pounds of NO_x per ton of feedstock processed.
- (e) HCl emissions from the pyrolysis unit shall not exceed 0.1 pounds of HCl per ton of feedstock processed.

Compliance with these limits, combined with the potential to emit of SO₂, NO_x, and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of SO₂, and NO_x to less than 100 tons per year, each, any single HAP less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable.

D.1.2 PM, PM₁₀, and PM_{2.5} Limits [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 and in order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

- (a) PM emissions from baghouse CE-01, which controls emissions from the raw material processing area, pyrolysis unit, and char load out system shall not exceed 19.8 pounds per hour.
- (b) PM₁₀ emissions from baghouse CE-01, which controls emissions from the raw material processing area, pyrolysis unit, and char load out system shall not exceed 19.8 pounds per hour.
- (c) PM_{2.5} emissions from baghouse CE-01, which controls emissions from the raw material processing area, pyrolysis unit, and char load out system shall not exceed 19.8 pounds per hour.

Compliance with these limits, combined with Conditions D.1.1(a), D.1.1(b), and the potential to emit PM, PM₁₀, and PM_{2.5} from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM₁₀, and PM_{2.5} to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Program) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.3 VOC Limits [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 not applicable, the pyrolysis unit shall be limited as follows:

- (a) The annual feedstock throughput rate to the pyrolysis unit shall not exceed 33,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) VOC emissions from the pyrolysis unit shall not exceed 1.49 pounds of VOC per ton of feedstock processed.

Compliance with these limits in conjunction with Conditions D.1.1(a) and (b), shall limit the potential to emit VOC from the pyrolysis unit to less than 25 tons per 12 consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities New Facilities) not applicable.

D.1.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, particulate emissions from each of following operations shall not exceed the pound per hour limits listed in the table below:

Unit Description	Baghouse ID	Max. Throughput Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
Raw Material Processing Area	CE-01	10	19.18
Pyrolysis Unit	CE-01	4.5	11.23
Char Load Out System	CE-01	4.5	11.23

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

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

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

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

- (a) No later than one hundred and eighty (180) days after the initial startup, the Permittee shall perform SO₂, NO_x, and VOC testing in order to demonstrate compliance with Conditions D.1.1 and D.1.3 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.
- (b) Pursuant to 326 IAC 2-8-4, the Permitted shall perform dioxin and furans testing, no later than one hundred and eighty (180) days after the initial startup. This test shall be

repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

- (c) In order to determine compliance with Condition D.1.1(f), the source shall perform HCl testing on the pyrolysis unit not later than five (5) years from the date of the most recent valid compliance demonstration, whichever is later. This testing shall be conducted utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.
- (d) In order to determine compliance with Conditions D.1.2(a) and D.1.4, the Permittee shall perform PM testing of baghouse CE-01, which controls PM emissions from the raw material processing area, pyrolysis unit, and char load out system not later than 180 days after the issuance date of FESOP No. 085-28516-00115, utilizing methods approved by the commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.
- (e) In order to determine compliance with Conditions D.1.2(b) and D.1.2(c), the Permittee shall perform PM10 and PM2.5 testing of baghouse CE-01, which controls PM10 and PM2.5 emissions from the raw material processing area, pyrolysis unit, and char load out system not later than 180 days after final promulgation of the new or revised condensable PM test method(s) referenced in the U.S. EPA's Final Rule for Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers (PM2.5), signed on May 8th, 2008 or not later than 180 days after the issuance date of FESOP No. 085-28516-00115, whichever is later. This testing shall be conducted utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

D.1.7 Particulate and HCl Control

- (a) In order to comply with Conditions D.1.2 and D.1.4, the baghouse for particulate control shall be in operation and control emissions at all times when the raw material processing area, pyrolysis unit, and char load out system are in operation.
- (b) In order to comply with Condition D.1.1(f), the Permittee shall inject free-flowing lime into the airstream of baghouse CE-01 at all times when the pyrolysis unit is 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 2-8-4][326 IAC 2-8-5(a)(1)]

D.1.8 Visible Emissions Notations

- (a) Visible emission notations of the raw material processing area, pyrolysis unit, and char load out system stack exhaust 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) When an abnormal emission is observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.9 Parametric Monitoring

- (a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the raw material processing area, pyrolysis unit, and char load out system, at least once per day when the raw material processing area, pyrolysis unit, and char load out system are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) 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 or replaced at least once every six (6) months.
- (c) The Permittee shall monitor the lime injection rate at the baghouse, identified as CE-01 at least once per shift when the pyrolysis unit is in operation. When for any one reading, the lime injection rate is outside the normal range established during the most recent stack test, the Permittee shall take reasonable response. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. An injection rate reading that is outside the normal range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (d) The Permittee shall inspect the lime injection system to verify that the lime is always free-flowing at least once per shift when the pyrolysis unit is in operation. When for any one inspection, the lime is found not to be free-flowing, the Permittee shall take reasonable response. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

Failure to take response steps shall be considered a deviation from this permit.

D.1.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For a single compartment baghouses 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 emission unit. 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's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.1.11 Wood Inspections

- (a) In order to demonstrate compliance with Condition D.1.1(a), the Permittee shall perform visual inspections of each wood delivery. Inspections shall be conducted by trained plant personnel. The inspections shall be conducted to ensure that the material being delivered does not contain any of the following materials:
 - (1) Treated, painted, or coated wood materials,
 - (2) Particle board or plywood, and
 - (3) Non-wood materials (i.e. plastic, metal, rubber, etc...)
- (b) Loads containing any of the materials listed in Condition D.1.11(a) shall be rejected and returned to the supplier.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.12 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1(a), the Permittee shall maintain a copy of all contracts which indicates the wood suppliers cannot deliver any of the types of materials other than the materials listed in Condition D.1.1(a).
- (b) To document the compliance status with Conditions D.1.1(b) and D.1.3(a), the Permittee shall maintain monthly records of the amount of feedstock processed in the pyrolysis unit.
- (c) To document the compliance status with Condition D.1.8, the Permittee shall maintain a daily record of the visible emissions from the raw material processing area, pyrolysis unit, and char load out system stack exhaust. The Permittee shall include in its daily record when a visible emissions is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (d) To document the compliance status with Condition D.1.9(a), the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the raw material

processing area, pyrolysis unit, and char load out system. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

- (e) To document the compliance status with Condition D.1.9(c), the Permittee shall maintain records of the once per shift lime injection rate. The Permittee shall include in its record when an injection rate reading is not taken and the reason for the lack of an injection rate reading (e.g. the process did not operate that-day).
- (f) To document the compliance status with Condition D.1.9(d), the Permittee shall maintain records of the results of the lime injection system inspections.
- (g) To document the compliance status with Condition D.1.11, the Permittee shall maintain records of the results of all wood delivery inspections.
- (h) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance status with Conditions D.1.1(b) and D.1.3(a), shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Nature's Fuel
Source Address: 510 E. Main St., Atwood, Indiana 46502
FESOP Permit No.: F085-26494-00115

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:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Nature's Fuel
Source Address: 510 E. Main St., Atwood, Indiana 46502
FESOP Permit No.: F085-26494-00115

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Nature's Fuel
Source Address: 510 E. Main St., Atwood, Indiana 46502
FESOP Permit No.: F085-26494-00115
Facility: Pyrolysis Unit
Parameter: Amount of feedstock
Limit: The annual feedstock throughput rate to the pyrolysis unit shall not exceed 33,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Nature's Fuel
Source Address: 510 E. Main St., Atwood, Indiana 46502
FESOP Permit No.: F085-26494-00115

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, 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	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Mail to: Permit Administration and Support Section
Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Nature's Fuel
510 E. Main St.
Atwood, Indiana 46502

Affidavit of Construction

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____
(Company Name)
4. I hereby certify that Nature's Fuel 510 E. Main St., Atwood, Indiana 46502, completed construction of the source to convert wood and wood waste into renewable energy on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on May 7, 2008 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F085-26494-00115, Plant ID No. 085-00115 issued on September 10, 2008.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

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

Signature _____
Name _____ (typed or printed)

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

Addendum to the Technical Support Document (ATSD) for a
Significant Permit Revision to a Federally Enforceable State
Operating Permit (FESOP)

Source Background and Description

Source Name:	Nature's Fuel
Source Location:	510 East Main Street, Atwood, Indiana 46502
County:	Kosciusko
SIC Code:	2869
Operation Permit No.:	F 085-26494-00115
Operation Permit Issuance Date:	September 10, 2008
Significant Permit Revision No.:	085-28516-00115
Permit Reviewer:	Brian Williams

On June 6, 2010, the Office of Air Quality (OAQ) had a notice published in the Times Union, Warsaw, Indiana, stating that Nature's Fuel had applied for a significant permit revision to request the ability use "producer gas", "Nature's Fuel Bio-Oil", or No. 2 fuel oil in the combustion box. In addition, the source requested that IDEM revise the permit to clarify that the pyrolysis unit is controlled by a baghouse and that the feedstock will not always consist of 100 percent wood and wood waste since there is the possibility of the presence of non-wood materials. The source also applied to construct new bio-oil, No. 2 fuel oil, and diesel storage tanks. Finally, the source requested to increase the existing VOC emission limit and decrease the existing feedstock throughput limit. The notice also stated that the OAQ proposed to issue a significant permit revision 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. A public meeting was held on July 6, 2010 at the Public Library in Warsaw, Indiana and the public comment period was extended to July 12, 2010. This addendum contains written comments received during the public comment period and public meeting.

Comments and Responses

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

IDEM has summarized and consolidated comments received from the public in regards to the draft significant permit revision. Comments dealing with a similar issue were grouped and IDEM provided a response on the issue in question. Appendix B to the ATSD contains a complete list of the commenter's names.

Comment 1:

Many comments were received expressing concern that Nature's Fuel has contaminated the groundwater in Atwood. In addition, comments were received about improper drainage practices at the facility, which caused flooding of an adjacent property.

Response to Comment 1:

IDEM, OAQ understands that this is a concern to the citizens of Atwood; however, OAQ's permit review by law cannot address issues for which it does not have direct regulatory authority. IDEM's Office of Water Quality is responsible for monitoring, protecting, and improving Indiana's water quality to ensure its continued use as a drinking water source, habitat for wildlife, recreational resource and economic asset. For concerns related to water quality issues contact either the Kosciusko County Wastewater Inspection, Michael Kuss, at (574)245-4884 (for concerns regarding wastewater discharge from the plant), the Kosciusko County Drinking Water Inspector, Lucio Ternieden, at (574)245-4886 (for concerns about the local drinking water supply), or Beth Noel (312)232-8706 (for permitting concerns). In addition, the Kosciusko County Area Plan Commission Office enforces Stormwater and Erosion Control and Flood Control Ordinances. No changes were made as a result of this comment.

Comment 2:

Many commenter's stated they did not like the location of this source, the history of fires and explosions onsite, noxious odors, noise, loss of income, high electricity bills due to the inability to open windows, decline in property values, inability to spend time outdoors, and general decline in the quality of life in Atwood.

Response to Comment 2:

IDEM, OAQ recognizes that these matters are of great personal concern to the commenter's and other local residents. However, IDEM, OAQ does not have the regulatory authority to consider impairment of property values and income, fire safety, noise, and odors when issuing air permits. In addition, IDEM OAQ does not have authority to regulate zoning, noise, odor, or traffic on roads or railroads. These matters are under the separate authority of local government units, such as a zoning board, county council, or county commission.

Pursuant to IC 13-30-2-1(1) "A person may not discharge, emit, cause, allow, or threaten to discharge, emit, cause, or allow any contaminant or waste, including any noxious odor, either alone or in combination with contaminants from other sources, into the environment, in any form that causes or would cause pollution that violates or would violate rules, standards, or discharge or emission requirements adopted by the appropriate board under the environmental management laws."

The Air Pollution Control Board (APCB) is responsible for adopting rules regarding various air pollution matters. IDEM is following the air permit rules as set out in Title 326 of the Indiana Administrative Code, as passed by the APCB. As a result, this permit does not address odors because the APCB has not adopted or incorporated any state or federal rules, standards, or emission requirements for noxious odors into Title 326 of the Indiana Administrative Code.

However, odors might be an indicator that the source is out of compliance, please contact the current Compliance Inspector, Richard Reynolds, at (574)245-4888 or IDEM's Northern Regional Office at (800) 753-5519 to file an odor complaint. In addition, IDEM's Complaint Clearinghouse provides more information regarding filing complaints and is available at IDEM's website at <http://www.in.gov/idem/5274.htm>. No changes were made as a result of this comment.

Comment 3:

How many of Nature's Fuel owners or investors live within 2 miles or close to Nature's Fuel? How many of them pay taxes in Kosciusko County? How many of them have to breathe the horrible odors emitted by Nature's Fuel?

Response to Comment 3:

IDEM OAQ's permit review by law cannot address issues for which it does not have direct regulatory authority. Therefore, whether the owners or investors live near Nature's Fuel or pay local taxes is outside the scope of IDEM OAQ's permit review process. No changes were made as a result of this comment.

Comment 4:

The stack test report from the most recent stack testing contained a material safety data sheet (MSDS) for acetone, which is a hazardous chemical. According to the MSDS, the symptoms of exposure to acetone include headaches, nausea, and vomiting, which are the same symptoms we suffer in Atwood. Why was acetone referenced in the stack test report? Does the source use acetone?

Response to Comment 4:

Acetone is used in a Method 5 test to quantitatively recover particulate matter (PM) from the sample train's probe nozzle, probe fitting, probe liner and front half of the filter holder. The acetone is used while brushing and rinsing the sample train after a test run is completed to make sure all of the PM that entered the sample train has been properly recovered. After the sample is collected, the acetone is allowed to evaporate (back at the lab) and the residual particulate is weighed and used to calculate a PM emission rate. While acetone was used during the stack test, this solvent is not used by Nature's Fuel in the production of bio-oil and char. No changes were made as a result of this comment.

Comment 5:

Nature's Fuel was previously limited to 0.89 pounds of VOC per ton of feedstock. However, the draft permit increases the VOC emissions to 1.49 pounds of VOC per ton of feedstock. Why is IDEM allowing them to emit more VOC emissions?

Response to Comment 5:

The pyrolysis unit has an unlimited potential to emit VOC greater than twenty-five (25) tons per year and was constructed after January 1, 1980. Therefore, this unit would have been subject to the requirements of 326 IAC 8-1-6, which requires a source to reduce VOC emissions using the best available control technology (BACT). However, pursuant to 326 IAC 8-1-1(b), "A facility subject to this article may be exempted by the commissioner from any of these applicability sections if the facility has an enforceable permit issued under 326 IAC 2." Nature's Fuel was issued a Federally Enforceable State Operating Permit under the provisions of 326 IAC 2-8. As a result, the source agreed to limit VOC emissions from the pyrolysis unit to 0.89 pounds of VOC per ton of feedstock. In addition, the source accepted a feedstock limit of 55,500 tons per year. This resulted in a limited potential to emit VOC of 24.7 tons per year. Since the VOC emissions from the pyrolysis unit were limited to less than twenty-five (25) tons per year, the requirements of 326 IAC 8-1-6 were rendered not applicable to the pyrolysis unit.

Due to the experimental nature of this facility, IDEM required the source to perform VOC testing of the pyrolysis unit to verify that they could comply with the limit of 0.89 pounds of VOC per ton of feedstock. On January 14th and 15th of 2010, Nature's Fuel performed stack testing and determined that the actual VOC emission rate is 1.49 pounds of VOC per ton of feedstock. As a result, the source was in violation of their permit. Nature's Fuel then requested that IDEM increase the VOC emission limit to 1.49 pounds of VOC per ton of feedstock and decrease the feedstock limit to 33,000 tons of feedstock per year. This still results in a limited potential to emit VOC of 24.6 tons per year. The revisions to the permit decrease the annual VOC emissions

allowed. No changes were made as a result of this comment.

Comment 6:

According to the draft permit the source wants to build several new storage tanks. This presents a future safety hazard. This does not sound like a company that plans to comply with the Agreed Order to cease operations on January 31, 2011. Instead, this sounds like a plan for Nature's Fuel to grow bigger and amplify the existing nuisances.

Response to Comment 6:

IDEM has evaluated the potential emissions from the storage tanks using TANKS Emissions Estimation Software, version 4.09d and determined that any VOC emission from the new and existing storage tanks will be negligible. In addition, IDEM has determined that the storage tanks are not subject to any state or federal air regulations. IDEM OAQ does not have the regulatory authority to prevent the source from installing the remaining storage tanks.

Nature's Fuel was issued a New Source FESOP (Permit No. 085-26494-0015) on September 10, 2008. The term for this permit under Indiana law is five (5) years and therefore the FESOP expires in September of 2013. The current significant permit revision does not affect the original permit term of the Nature's Fuel FESOP. The air permit is independent of the IDEM Agreed Order Case No. 2009-18768-S, which requires Nature's Fuel to cease pyrolysis operations on January 31, 2011. No changes were made as a result of this comment.

Comment 7:

Many commenters expressed concern about the potential short and long term health effects from Nature's Fuel air emissions on otherwise healthy individuals and those with preexisting health conditions. In addition, many commenters were concerned about the overall air quality in Atwood.

Response to Comment 7:

The Office of Air Quality issues air pollution control permits to facilities that emit regulated levels of pollutants to the air. Permits require sources to comply with all health-based and technology-based standards established by the U.S. EPA and the Indiana Air Pollution Control Board. If an applicant demonstrates that they will be able to comply with all Federal and State laws regarding air pollution, IDEM is required by law to issue the air permit.

The Federal Clean Air Act requires the United States Environmental Protection Agency (U.S. EPA) to set National Ambient Air Quality Standards (NAAQS) for six criteria pollutants. These criteria pollutants are carbon monoxide (CO), lead (Pb), sulfur dioxide (SO₂), particulate matter to a diameter of 2.5 microns (PM_{2.5}), nitrogen oxides (NO_x) and ground level ozone. According to the U.S. EPA of the six criteria pollutants, particulate and ground-level ozone are the most widespread health threats.

The Clean Air Act requires U.S. EPA to set National Ambient Air Quality Standards (NAAQS) for the six criteria pollutants, which are considered harmful to public health and the environment. The Clean Air Act established two types of national air quality standards. Primary standards set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings. Additionally, the Clean Air Act requires the U.S. EPA to determine whether the ambient air in any area of the United States fails to meet any of the National Ambient Air Quality Standards (NAAQS). Any area that fails to meet one or more of

the NAAQS will be designated as in "nonattainment" for that pollutant. Large air pollution sources in a nonattainment area are subject to additional regulations and the U.S. EPA may require that additional steps be taken that will result in the area meeting the NAAQS. IDEM conducts sampling of the ambient air at monitoring stations around Indiana. This air monitoring measures whether the NAAQS are being met. Kosciusko County has been designated as attainment or unclassifiable for all criteria pollutants. Information about Indiana's air monitoring system and monitoring results are available at <http://www.in.gov/idem/4116.htm>. Information about current and expected air pollution levels are on IDEM's SmogWatch site at <http://www.in.gov/apps/idem/smog/> on the internet.

The following sections provide more detail about each criteria pollutant. In addition, more details about hydrochloric acid (HCl) are included below since HCl is the primary hazardous air pollutant emitted from the source.

The health problems caused by particulates are directly linked to the size of particles. Particles less than 10 micrometers in diameter pose the greatest problems, because they can get deep into your lungs, and may even enter your bloodstream. Exposure to such particles can affect both your lungs and your heart. Small particles of concern include "inhalable coarse particles" (such as those found near roadways and dusty industries), which are larger than 2.5 micrometers and smaller than 10 micrometers in diameter; and "fine particles" (such as those found in smoke and haze), which are 2.5 micrometers in diameter and smaller.

The U.S. EPA's National Ambient Air Quality Standard for SO₂ is designed to protect against exposure to the entire group of sulfur oxides (SO_x). SO₂ is the component of greatest concern and is used as the indicator for the larger group of gaseous sulfur oxides (SO_x). Other gaseous sulfur oxides (e.g. SO₃) are found in the atmosphere at concentrations much lower than SO₂. Emissions that lead to high concentrations of SO₂ generally also lead to the formation of other SO_x. Control measures that reduce SO₂ can generally be expected to reduce people's exposures to all gaseous SO_x. This may have the important co-benefit of reducing the formation of fine sulfate particles, which pose significant public health threats. SO_x can react with other compounds in the atmosphere to form small particles. These particles penetrate deeply into sensitive parts of the lungs and can cause or worsen respiratory disease, such as emphysema and bronchitis, and can aggravate existing heart disease, leading to increased hospital admissions and premature death. EPA's NAAQS for particulate matter (PM) are designed to provide protection against these health effects.

The sum of nitric oxide (NO) and NO₂ is commonly called nitrogen oxides or NO_x. Other oxides of nitrogen including nitrous acid and nitric acid are part of the nitrogen oxide family. While EPA's National Ambient Air Quality Standard (NAAQS) covers this entire family, NO₂ is the component of greatest interest and the indicator for the larger group of nitrogen oxides. NO_x react with ammonia, moisture, and other compounds to form small particles. These small particles penetrate deeply into sensitive parts of the lungs and can cause or worsen respiratory disease, such as emphysema and bronchitis, and can aggravate existing heart disease, leading to increased hospital admissions and premature death.

Ozone (O₃) is a gas composed of three oxygen atoms. It is not usually emitted directly into the air, but at ground-level is created by a chemical reaction between oxides of nitrogen (NO_x) and volatile organic compounds (VOC) in the presence of sunlight. According to the U.S. EPA breathing ozone can trigger a variety of health problems including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level ozone also can reduce lung function and inflame the linings of the lungs.

Ozone has the same chemical structure whether it occurs miles above the earth or at ground-level and can be "good" or "bad," depending on its location in the atmosphere. In the earth's lower atmosphere, ground-level ozone is considered "bad." "Good" ozone occurs naturally in the

stratosphere approximately 10 to 30 miles above the earth's surface and forms a layer that protects life on earth from the sun's harmful rays.

Cars and other vehicles are the largest source of ozone precursors. Other important sources include industrial facilities, power plants, gasoline-powered mowers, and evaporation of cleaners, paints, and other chemicals. Ground-level ozone is the primary constituent of smog. Sunlight and hot weather cause ground-level ozone to form in harmful concentrations in the air. As a result, it is known as a summertime air pollutant. Many urban areas tend to have high levels of "bad" ozone, but even rural areas are also subject to increased ozone levels because wind carries ozone and pollutants that form it hundreds of miles away from their original sources.

Carbon monoxide can cause harmful health effects by reducing oxygen delivery to the body's organs and tissues. The health threat from lower levels of CO is most serious for those who suffer from heart disease. For a person with heart disease, a single exposure to CO at low levels may cause chest pain and reduce that person's ability to exercise; repeated exposures may contribute to other cardiovascular effects. In addition, healthy people who breathe high levels of CO can develop vision problems, reduced ability to work or learn, reduced manual dexterity, and difficulty performing complex tasks. At extremely high levels, CO is poisonous and can cause death. Nationwide, three-quarters of carbon monoxide emissions come from cars and trucks and non-road engines (such as boats and construction equipment). The highest levels of CO in the outside air typically occur during the colder months of the year when inversion conditions (air pollution becomes trapped near the ground beneath a layer of warm air) are more frequent.

Lead is persistent in the environment and accumulates in soils and sediments through deposition from air sources, direct discharge of waste streams to water bodies, mining, and erosion. Ecosystems near point sources of lead demonstrate a wide range of adverse effects including losses in biodiversity, changes in community composition, decreased growth and reproductive rates in plants and animals, and neurological effects in vertebrates.

In addition to exposure to lead in air, other major exposure pathways include ingestion of lead in drinking water and lead-contaminated food as well as incidental ingestion of lead-contaminated soil and dust. Lead-based paint remains a major exposure pathway in older homes. Once taken into the body, lead distributes throughout the body in the blood and is accumulated in the bones. Depending on the level of exposure, lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems and the cardiovascular system. Lead exposure also affects the oxygen carrying capacity of the blood. The lead effects most commonly encountered in current populations are neurological effects in children and cardiovascular effects (e.g., high blood pressure and heart disease) in adults. Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits and lowered IQ.

Hydrochloric acid is corrosive to the eyes, skin, and mucous membranes. Acute (short-term) inhalation exposure may cause eye, nose, and respiratory tract irritation and inflammation and pulmonary edema in humans. Acute oral exposure may cause corrosion of the mucous membranes, esophagus, and stomach and dermal contact may produce severe burns, ulceration, and scarring in humans. Chronic (long-term) occupational exposure to hydrochloric acid has been reported to cause gastritis, chronic bronchitis, dermatitis, and photosensitization in workers. Prolonged exposure to low concentrations may also cause dental discoloration and erosion. EPA has not classified hydrochloric acid for carcinogenicity.

Comment 8:

The permit specifically states in part, "The applicant intends to construct and operate new equipment that will emit air pollutants" what pollutants will the new equipment emit? In addition, what kind of air emissions and odor will result from the new feedstocks, such as manure, plastics,

animal and organic offal, and viscera?

Response to Comment 8:

The source plans to construct new storage tanks, which will have the potential to emit negligible amounts of VOC. In addition, the source has requested the ability to combust No. 2 fuel oil, "producer gas," and "Nature's Fuel Bio-Oil" in the existing combustion box. Combustion of these fuels will result in emissions of PM, PM10, PM2.5, SO2, NOx, VOC, CO, and a variety of hazardous air pollutants. Please see the Technical Support Document (TSD) and Appendix A to the TSD for more detailed information on the air pollutants. In regards to the potential air emissions and odors from the new feedstock please see Response to EPA Comment 7.

Comment 9:

Many commenters stated that Nature's Fuel has fugitive emissions of a black residue from the char that is generated onsite. The black residue accumulates on the commenters cars and houses and is hard to remove. Many of the commenters flowers and gardens have been ruined by the black residue. As a result, this has prohibited many commenters from having subsequent gardens.

Response to Comment 9:

IDEM, OAQ recognizes that these matters are of great personal concern to the commenters and other local residents. Condition C.6 of the draft permit regulates fugitive dust emissions by incorporating the requirements of 326 IAC 6-4. According to this condition, 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.

Emissions of dust might be an indicator that the source is out of compliance. IDEM encourages residents to contact the Compliance Inspector when they witness abnormal emissions at the source. Please contact the current Compliance Inspector, Richard Reynolds, at (574)245-4888 or IDEM's Northern Regional Office at (800) 753-5519 to file a fugitive dust complaint. In addition, IDEM's Complaint Clearinghouse provides more information regarding filing complaints and is available at IDEM's website at <http://www.in.gov/idem/5274.htm>. No changes were made as a result of this comment.

Comment 10:

You have indicated that Nature's Fuel is not in violation because you have tested the "black dust" and determined that it does not contain anything hazardous. However, Nature's Fuel was notified in advance about the testing. Have you ever considered testing Nature's Fuel without notifying them in advance?

Response to Comment 10:

IDEM required the source to perform stack testing of the pyrolysis unit for PM, PM10, SO2, NOx, VOC, and dioxin and furans within 180 days after initial startup. Condition C.8 of FESOP No. 085-26494-00115 incorporated the requirements of 326 IAC 3-6. According to this condition, the source was required to submit a test protocol no later than 35 days prior to the intended test date to IDEM. The test protocol included specific details about the testing, such as the proposed sampling method, location of the test, and production rate. During the actual test the source was required to operate the pyrolysis unit at 95% to 100% of its permitted operating capacity and under operating conditions representative of normal operations. It is the responsibility of the source to prepare and submit the test protocol, determine the actual test date, and perform the actual stack testing. The source may elect to hire a testing company to aid them in this process.

IDEM staff are required to review the test protocol prior to testing to ensure that the proposed testing satisfies all applicable requirements. In addition, IDEM staff may be present to observe the stack testing but do not participate. The source is then required to submit the test results no later than 45 days after the completion of the testing. The source performed the required testing on January 14th and 15th of 2010 and IDEM reviewed the results and determined them to be valid. If IDEM feels that the operating conditions at the source no longer reflect the operating conditions during the stack test, the commissioner may require stack testing at any time to assure compliance with the applicable requirements by issuing an order under 326 IAC 2-1.1-11. No changes were made as a result of this comment.

Comment 11:

According to the IDEM Land Permit Application submitted by Nature's Fuel there are no persons of interest near the plant that could be negatively impacted. This is a deceptive act by Nature's Fuel. There are approximately 100 residents directly adjacent to the facility. Why was the source not required to notify the citizens of Atwood about their request for a Land Permit?

Response to Comment 11:

Questions and concerns in regards to Nature's Fuel land permit should be directed to John Hale of the Office of Land Quality at (317) 232-8871. No changes were made as a result of this comment.

Comment 12:

Is this plant shutting down because IDEM has directed them to do so, or is the plant shutting down voluntarily? If IDEM has directed Nature's Fuel to shut down what are the reasons for shutting them down? The resident's have complained that this facility has made them sick, hurt their property values, and degraded air quality? Does IDEM regulate these issues?

Response to Comment 12:

Both IDEM and Nature's Fuel have concerns with the present location of their plant. During a recent meeting between IDEM and Nature's Fuel this topic was discussed. As a result, an agreement was reached that Nature's Fuel would close by January 31, 2011. This agreement was accomplished through a legally binding document called an Agreed Order. IDEM, OAQ has the authority to regulate air quality but does not have the authority to regulate the impact of facilities on property values. Please note that it is feasible for a facility to emit odors that are offensive, while remaining in compliance with their air permit. No changes were made as a result of this comment.

On July 9, 2010, the U.S. EPA submitted comments to IDEM, OAQ on the draft significant permit revision.

Comment 1:

Section A.3 lists insignificant activities, which includes several storage tanks, how was it determined that these tanks were insignificant? For example:

326 IAC 2-7-1(21)(g)(ii)(BB) A petroleum fuel other than gasoline dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less.

Tank E is a diesel fuel storage tank with the capacity of 18,000 gallons and no dispensing limitation, but is still listed as an insignificant activity.

Response to Comment 1:

The storage tanks were determined to be insignificant activities pursuant to 326 IAC 2-7-1(21)(A)(iv), because each storage tank has potential VOC emissions less than fifteen (15) pounds per day. The combined potential to emit VOC from all of the storage tanks is less than 0.1 tons per year and was calculated using TANKS. Upon further review, IDEM has determined the diesel fuel storage tank capacity was incorrectly listed as 18,000 gallons in the draft permit. The correct storage capacity is 1,500 gallons. The permit has been revised as follows:

...
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

...
(d) One (1) diesel fuel storage tank identified as Tank E, ~~approved for construction~~ in 2010, with a maximum storage capacity of ~~18,000~~ 1,500 gallons.

...
Comment 2:

Section D.1 contains emission unit descriptions for a raw material processing area and combustion box that indicate that these units were constructed in 2008. However, these units do not appear in the previous permit issued on September 10, 2008.

Response to Comment 2:

A description of the raw material processing area was not contained in the FESOP No. 085-26494-00115, issued on September 10, 2008 because it was overlooked by IDEM and Nature's Fuel during the permit review process. As a result, IDEM added the raw material processing area description in this revision to more accurately reflect the emission units at the source. However, even though the raw material processing area was overlooked in the initial review, the potential emissions from this process were accounted for in Appendix A.1 to the ATSD in FESOP No. 085-26494-00115, because the process is controlled by baghouse CE-01.

The combustion box was previously identified as an insignificant activity in Section A.3(d) in FESOP No. 085-26494-00115. However, the existing emission unit description was revised and relocated to Section A.2 as a significant activity in order to more accurately reflect the current emission units and operations at the source. No changes were made as a result of these comments.

Comment 3:

The pyrolysis unit previously had a maximum capacity of 10 tons per hour. However, it is now listed as 4.5 tons per year in Sections A.1 and D.1. Please clarify how the maximum capacity of the pyrolysis unit was changed? Was a physical change made to limit the capacity from 10 tons per hour to 4.5 tons per hour or did the facility take an operating restriction to only process 4.5 tons per hour?

Response to Comment 3:

During the stack testing of the pyrolysis unit performed by the source on January 14th and 15th of 2010, it was determined that the pyrolysis unit cannot physically operate at 10 tons per hour. The average operating rate during the testing was only 3.1 tons per hour. As a result, Nature's Fuel overestimated the maximum capacity of the pyrolysis unit. Therefore, Nature's Fuel agreed to derate the maximum capacity of the pyrolysis unit to a more realistic 4.5 tons per hour. No changes were made as a result of this comment.

Comment 4:

In FESOP No. 085-26494-00115, issued on September 10, 2008, the SO₂ emission limit was 3.2 pounds per ton. However, the SO₂ emission limit is now listed as 3.23 pounds per ton, what was the reason for the increase?

Response to Comment 4:

In FESOP No. 085-26494-00115, the unlimited and limited SO₂ emissions were calculated using a SO₂ emission factor of 3.23 pounds per ton (see Page 1 of Appendix A to FESOP No. 085-26494-00115). This emission factor can be found in AP 42, Chapter 2.1 - Refuse Combustion, Table 2.1-9. However, the SO₂ emission limit was erroneously listed as 3.2 pounds per ton in the permit. Therefore, IDEM revised the SO₂ emission limit from 3.2 pounds per ton to 3.23 pounds per ton. The potential to emit SO₂ did not increase because of this revision, since the unlimited and limited potential to emit were calculated using the correct emission factor. No changes were made as a result of this comment.

Comment 5:

In Condition D.1.3 of FESOP No. 085-26494-00115, issued on September 10, 2008, the PM emissions from the pyrolysis unit were limited to 19.2 pounds per hour. However, in Condition D.1.2(a) of the draft permit, the PM emissions from baghouse CE-01, which controls PM emission from the pyrolysis unit are now limited such that they do not exceed 19.8 pounds per hour. In addition, Condition D.1.4 of the draft permit limits PM emissions to 19.18 pounds per hour. Why did the PM emission limit increase and which limit is correct?

Response to Comment 5:

The PM emission limit found in Condition D.1.3 of FESOP No. 085-26494-00115 was the allowable particulate emission rate under 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). Since the process weight rate for the pyrolysis unit was less than 60,000 pound per hour the allowable particulate emission rate was determined using the following equation:

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

As a result, the process weight rate was 10 tons per hour, which equates to an allowable particulate emission rate of 19.2 pounds per hour.

However, in the draft permit the process weight rate for the pyrolysis unit was decreased to 4.5 tons per hour, which equates to an allowable particulate emission rate of 11.23 pounds per hour.

In FESOP No. 085-26494-00115, the pyrolysis unit was incorrectly described as having no control devices. Therefore, the source requested that the permit be revised to indicate that the PM emissions from pyrolysis unit are controlled by baghouse CE-01. Since baghouse CE-01 controls PM emissions from the raw material processing area, pyrolysis unit, and char load out system, the worst case PM and PM₁₀ emissions would result when all three of the processes are in operation at the same time. As a result, the existing PM and PM₁₀ emission limits were revised from individual limits on the pyrolysis unit to PM and PM₁₀ limits on baghouse CE-01. Condition D.1.2 contains limits of PM, PM₁₀, and PM_{2.5} to render the requirements of 326 IAC 7- (Part 70 Program) and 326 IAC 2-2 (PSD) not applicable. Whereas, Condition D.1.4 of the revised permit contains the revised allowable particulate limits pursuant to 326 IAC 6-3-2 for the raw material processing area, pyrolysis unit, and char load out system. No changes were made

as a result of this comment.

Comment 6:

The pyrolysis unit is required to conduct emission testing for dioxins/furans (D/F), but there is no emission limit for D/F in the permit. For the testing of D/F will the facility be required to use 3% non-wood feedstock, which may produce the worst case scenario for D/F formation from the process? In addition, the emission unit description for the pyrolysis unit in Sections A.1 and D.1 indicates that the source uses carbon injection to control D/F emissions. Please clarify why there are there no requirements to monitor the carbon or to establish a carbon injection rate?

Response to Comment 6:

The unlimited dioxin and furan emission factor used for the pyrolysis process is 2.90×10^{-6} pounds per ton (AP 42, Chapter 2.1 - Refuse Combustion, Table 2.1-9). Therefore, the unlimited potential to emit dioxin and furan was 1.27×10^{-4} tons per year. As a result, it was unnecessary to include a dioxin and furan emission limit in FESOP No. 085-26494-00115. However, since the emission factor is based on the combustion of refuse, IDEM required the source perform a stack test to verify the dioxin and furan emission rate.

On January 14th and 15th of 2010 the source performed dioxin and furan testing. The source was required to use feedstock that is representative of their normal operations. Please note that the feedstock definition in the draft permit has been revised to remove any reference to 3% non-wood feedstock (see Response to Comment 7 for more details). The dioxin and furan emission rate was 2.23×10^{-11} pounds per ton after control. If IDEM assumes that the carbon injection system achieves a control efficiency of 99.9% the unlimited dioxin and furan emission rate would be 2.23×10^{-8} pounds per ton. As a result, using the AP 42 dioxin and furan emission factor of 2.90×10^{-6} pounds per ton generates the highest unlimited dioxin and furan emissions. Therefore, it is not necessary for the IDEM to require the source to use the carbon injection system to control dioxin and furan emissions since the unlimited emissions are less than 10 tons per year. No changes were made as a result of this comment.

Comment 7:

According to the permit and technical support document the facility will be able to use up to 3% non-wood materials. Is this 3% tracked by volume or weight? Will the facility need an inspection plan or sampling plan for materials used as feedstock to ensure that it does not contain any of the prohibited items, such as asbestos, cathode ray devices, fiberglass, etc...?

Response to Comment 7:

The intent of the feedstock limits in the draft permit was to address the potential presence of non-wood materials in the ground wood feedstock. Upon further review, IDEM has determined that the feedstock limits found in the draft permit do not adequately limit the potential hazardous air pollutant emissions from the source. Therefore, the 3% non-wood material feedstock limit has been removed from the permit. The source is now only allowed to pyrolyze char that is generated onsite and clean wood. In addition, IDEM will require the source to conduct inspections of the feedstock received and maintain contracts with the suppliers that restrict the types of feedstock that can be supplied. The permit has been revised as follows:

D.1.1 FESOP Limits [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following:

- (a) The Permittee shall only pyrolyze ~~feedstock containing at least 97% wood and no more than 3% of the following materials unless defined as hazardous in 40 CFR: animal and~~

~~organic offal, animal feed wastes, asphalt, biogenic plant wastes, carbon, carpet, char, charcoal, or coals, dairy wastes, fabrics, textiles, woven materials, fats, foams, including styrofoams, food wastes, grease, lawn waste, leather, lime, linoleum, flexible floor tiles, manure, mycelium, non hazardous solvents, paints, latex, or coatings, oils, packaging, paper products, pharmaceutical wastes, plastics, polymers, resins, rubber, sugars, tar, textiles, tires, and waxes~~ **char produced onsite and clean wood, which only includes uncoated, unpainted, and untreated wood scrap, sawdust, chips, millings, or shaving, and natural growth materials.**

- ~~(b) The Permittee shall not pyrolyze materials that contain any of the following items: asbestos, ash, batteries, bottled gases, cathode ray devices, chlorinated solvents, sealed containers, explosives, fertilizers, fiberglass or rock wool insulation, glass, hazardous light bulbs, herbicides, insecticides, insulation other than foam, solids or sludges classified as hazardous in 40 CFR, lead based paints or coatings, liquids or sludges with a flash point of less than 140°F, medical surgical wastes, metals, PCB laden oils or solvents, poisons, propane tanks, radioactive wastes, rocks, brick, salts, and sands.~~
- (eb) The annual feedstock throughput rate to the pyrolysis unit shall not exceed 33,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (ec) SO₂ emissions from the pyrolysis unit shall not exceed 3.23 pounds of SO₂ per ton of feedstock processed.
- (ed) NO_x emissions from the pyrolysis unit shall not exceed 3.16 pounds of NO_x per ton of feedstock processed.
- (fe) HCl emissions from the pyrolysis unit shall not exceed 0.1 pounds of HCl per ton of feedstock processed.

...

D.1.11 Wood Inspections

- (a) **In order to demonstrate compliance with Condition D.1.1(a), the Permittee shall perform visual inspections of each wood delivery. Inspections shall be conducted by trained plant personnel. The inspections shall be conducted to ensure that the material being delivered does not contain any of the following materials:**
- (1) **Treated, painted, or coated wood materials,**
 - (2) **Particle board or plywood, and**
 - (3) **Non-wood materials (i.e. plastic, metal, rubber, etc...)**
- (b) **Loads containing any of the materials listed in Condition D.1.11(a) shall be rejected and returned to the supplier.**

D.1.142 Record Keeping Requirements

- (a) **To document the compliance status with Condition D.1.1(a), the Permittee shall maintain a copy of all contracts which indicates the wood suppliers cannot deliver any of the types of materials other than the materials listed in Condition D.1.1(a).**
- (ab) To document the compliance status with Conditions ~~D.1.1(a)~~, D.1.1(b), ~~D.1.1(c)~~, and D.1.3(a), the Permittee shall maintain monthly records of the amount and types of feedstock processed in the pyrolysis unit.
- (bc) To document the compliance status with Condition D.1.8, the Permittee shall maintain a

daily record of the visible emissions from the raw material processing area, pyrolysis unit, and char load out system stack exhaust. The Permittee shall include in its daily record when a visible emissions is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(ed) To document the compliance status with Condition D.1.9(a), the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the raw material processing area, pyrolysis unit, and char load out system. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(de) To document the compliance status with Condition D.1.9(c), the Permittee shall maintain a daily record of the lime injection rate used in conjunction with the pyrolysis unit. The Permittee shall include in its daily record when an injection rate reading is not taken and the reason for the lack of an injection rate reading (e.g. the process did not operate that day).

...

(g) **To document the compliance status with Condition D.1.11, the Permittee shall maintain records of the results of all wood delivery inspections.**

(eh) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.123 Reporting Requirements

A quarterly summary of the information to document compliance status with Conditions D.1.1(eb) and D.1.3(a), shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

Comment 8:

Condition D.1.9(c) requires the source to monitor the lime injection rate at least once per day while in operation, is once per day adequate? Lime has a tendency to clump especially in humidity. Would it be more appropriate to require the source to monitor the lime injection rate once per shift or to ensure that the lime is continuous and free flowing during operation?

Response to Comment 8:

IDEM agrees that the lime injection rate should be monitored more frequently due to the tendency for lime to clump. The permit has been revised as follows:

D.1.7 Particulate and HCl Control

...

(b) In order to comply with Condition D.1.1(f), the Permittee shall inject **free-flowing** lime into the airstream of baghouse CE-01 at all times when the pyrolysis unit is in operation.

...

D.1.9 Parametric Monitoring

...

(c) The Permittee shall monitor the lime injection rate **at the baghouse, identified as CE-01 used with the pyrolysis unit** at least once per **day shift** when the **pyrolysis** unit is in operation. When for any one reading, the lime injection rate is outside the normal range established during the most recent stack test, the Permittee shall take reasonable response. Section C- Response to Excursions or Exceedances contains the Permittee's

obligation with regard to the reasonable response steps required by this condition. An injection rate reading that is outside the normal range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

- (d) **The Permittee shall inspect the lime injection system to verify that the lime is always free-flowing at least once per shift when the pyrolysis unit is in operation. When for any one inspection, the lime is found not to be free-flowing, the Permittee shall take reasonable response. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.**

...
D.1.142 Record Keeping Requirements

- (de) To document the compliance status with Condition D.1.9(c), the Permittee shall maintain ~~a daily records~~ of the **once per shift** lime injection rate ~~used in conjunction with the pyrolysis unit~~. The Permittee shall include in its ~~daily~~ record when an injection rate reading is not taken and the reason for the lack of an injection rate reading (e.g. the process did not operate that-day).
- (f) **To document the compliance status with Condition D.1.9(d), the Permittee shall maintain records of the results of the inspections required under Condition D.1.9(d).**
- (eh) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

...
Additional Changes

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

- (a) Upon further review, IDEM OAQ has determined that Nature's Fuel already installed the storage tanks identified as Tank A, B, C, D, E, G, H, I, J, K, and T-4 in 2009. Pursuant to 326 IAC 2-1.1-3(e)(1), modifications to existing sources that have the potential to emit less than ten (10) tons of VOC per year, one (1) ton of any single HAP per year, or two and one-half (2.5) tons of any combination per year are exempt from submitting an application. IDEM has evaluated the potential emissions from the storage tanks using TANKS Emissions Estimation Software, version 4.09d and determined that the combined potential to emit VOC from all of the storage tanks is less than 0.1 tons per year. Therefore, Nature's Fuel was not required to obtain prior approval to construct the storage tanks. In addition, IDEM has revised the tank capacities for Tanks E, F, G, and H through N to correct typographical errors. Section A.3 has been revised as follows:

...
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21).

- (a) One (1) bio-oil storage tank, identified as Tank A, ~~approved for construction~~ **in 204009**, with a maximum storage capacity of 18,000 gallons.
- (b) Two (2) bio-oil storage tanks, identified as Tanks B and C, ~~approved for construction~~ **in 204009**, with a maximum storage capacity of 8,800 gallons, each.
- (c) One (1) bio-oil storage tank, identified as Tank D, ~~approved for construction~~ **in 204009**, with a maximum storage capacity of ~~22,500~~ **18,000** gallons.

- (d) One (1) diesel fuel storage tank identified as Tank E, ~~approved for construction in 2010~~, with a maximum storage capacity of ~~18,000~~ **1,500** gallons.
- (e) One (1) bio-oil storage tank, identified as Tank F, approved for construction in 2010, with a maximum storage capacity of ~~41,500~~ **12,000** gallons.
- (f) One (1) bio-oil storage tank, identified as Tank G, ~~approved for construction in 2010~~, with a maximum storage capacity of ~~42,000~~ **14,000** gallons.
- (g) ~~Seven~~ **Four (4)** bio-oil storage tanks, identified as Tanks H through ~~NK~~, ~~approved for construction in 2010~~, with a maximum storage capacity of ~~44,000~~ **12,000** gallons, each.
- (h) Three (3) bio-oil storage tanks, identified as Tanks L through O, approved for construction in 2010, with a maximum storage capacity of 12,000 gallons, each.**
- (hi) One (1) bio-oil storage tank identified as T-1, approved for construction in 2010, with a maximum storage capacity of 7,200 gallons.
- (ij) One (1) bio-oil storage tank, identified as T-2, approved for construction in 2010, with a maximum storage capacity of 6,200 gallons.
- (jk) One (1) bio-oil storage tank, identified as T-3, approved for construction in 2010, with a maximum storage capacity of 1,000 gallons.
- (kl) One (1) No. 2 fuel oil storage tank, identified as T-4, ~~approved for construction in 2010~~, with a maximum storage capacity of 300 gallons.
- (lm) One (1) bio-oil storage tank, identified as T-5, approved for construction in 2010, with a maximum storage capacity of 9,000 gallons.
- (mn) Two (2) enclosed submerged filled bio-oil storage tanks, identified as T-6 and T-7, approved for construction in 2010, with a maximum storage capacity of 500 gallons, each.
- (no) Three (3) 7,000 gallon above ground fuel tanks.
- (op) Enclosed raw material storage piles.
- (pq) Unpaved roads and parking lots.

...

IDEM Contact

- (a) Questions regarding this proposed Significant Permit Revision to a FESOP can be directed to Brian Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5375 or toll free at 1-800-451-6027 extension 4-5375.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

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

Addendum to the Technical Support Document (ATSD)
Appendix B - Public Comments List

Source Background and Description
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Source Name:	Nature's Fuel
Source Location:	510 East Main Street, Atwood, Indiana 46502
County:	Kosciusko
SIC Code:	2869
Operation Permit No.:	F 085-26494-00115
Operation Permit Issuance Date:	September 10, 2008
Significant Permit Revision No.:	085-28516-00115
Permit Reviewer:	Brian Williams

Public Commenters

The following individuals submitted comments during the public notice period for the draft significant permit revision:

Name:		
Vic Virgil	Albert Earl	Tonya Woodling
Gary K. Williams	David Long	Melinda Groeneweg
Grace A. Williams	Karen Long	Dylan Smith
Betty Swanson	Amie Rogers	Lisa R. Gilman
Troy Swanson	Ronald G. Johnson	Michael T. Rheinheimer
Jack Boordman	Justin Hurt	Joel Peckham
Delia E. Nix	Debra Swanson	Jan Howard
Shawn Smith	Rob Ulery	Anita Poyser
Jen Smith	Howard Barnhart	James Poyser
Carol Sparrow	Mabel Barnhart	Tammy Freeman
Phil Sparrow	Phillip Byrer	Tami Edwards
Mike Jackson	Sharon Byrer	Sheryl L. Mckee
Luan Peckham	Elizabeth Howard	Mark A. Mikel
Diana Barnhart	Norman Hurt	Charles Williams
Cheyenne Hall	Sue Hurt	Kenneth W. Bell
Randy Johnson	Daniel Richard	Gwendolyn K. Bell
Shirley Johnson	Holly Egoir	Brent A. Byrer
Rhonda Williamson	Rick Jackson	Katy C. Byrer
Mike Williamson	Jo Ellen Jackson	Mary Beth Gast
James Moyer	Gary Hamill	
Tracey Moyer	Kathy Hamill	
Jennie Earl	Randy Woodling	

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name:	Nature's Fuel
Source Location:	510 East Main Street, Atwood, Indiana 46502
County:	Kosciusko
SIC Code:	2869
Operation Permit No.:	F 085-26494-00115
Operation Permit Issuance Date:	September 10, 2008
Significant Permit Revision No.:	085-28516-00115
Permit Reviewer:	Brian Williams

On September 30, 2009, the Office of Air Quality (OAQ) received an application from Nature's Fuel related to a modification to an existing stationary source that converts wood and wood waste into renewable energy.

Existing Approvals

The source was issued FESOP No. 085-26494-00115 on September 10, 2008. The source has since received Temporary Operation No. 085-27010-00115, issued on September 30, 2008.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment as of June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Kosciusko County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions, and the effective date of these rules was July 15, 2008. Indiana has three years from

the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

- (c) **Other Criteria Pollutants**
Kosciusko County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

In FESOP No. 085-26494-00115, issued on September 10, 2008, this source was determined to not be one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7. However, according to an U.S. EPA memo titled, "Classification of the Bardstown Fuel Alcohol Company under PSD," which was written on August 21, 1981 and an U.S. EPA applicability determination request for the Mecklenburg County Department of Environmental Protection on August 8, 1997, sources that operate under Standard Industrial Classification Major Group 28 - Chemicals and Allied Products Establishments are considered chemical process plants (Note: while wet and dry corn milling facilities that produce ethanol for fuel operate under SIC Code 2869, they have been specifically exempted from these requirements pursuant to the U.S. EPA). Therefore, since this source operates under SIC Code 2869 and does not produce ethanol, it is classified as a chemical process plant and it is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7. Therefore, fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

However, this source is not one of the twenty-eight (28) listed source categories as a fuel conversion plant because based on U.S. EPA correspondence to the South Carolina Department of Health and Environmental Services on June 4, 2007, to be considered a fuel conversion plant, the conversion process must involve a fossil fuel. Therefore, based on U.S EPA guidance this source is not considered a fuel conversion plant, since it converts biomass to a liquid state.

Status of the Existing Source

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

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Pyrolysis (Process)	53	86.6	86.6	89.6	87.7	24.8	8.3	0.05	0.039 Hexane
Char load out system	8.6	8.6	8.6	0	0	0	0	0	0
Insignificant Activities	4	4	4	4	4	4	4	0	0
Total PTE of Entire Source	65.6	99.2	99.2	93.6	91.7	28.8	12.3	0.05	0.039
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	100	100	100	100	100	100	100	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA
negl. = negligible These emissions are based upon ATSD to FESOP No.: 085-26494-00115, issued on September 10, 2008.									

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment 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) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs 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 Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Nature's Fuel on September 10, 2008, requesting operational flexibility in the fuel used in the pyrolysis unit. The pyrolysis unit currently burns natural gas to bring the pyrolysis process up to the necessary operating temperature. Once up to the operating temperature the unit generates a "producer gas," which may be run through the pyrolysis burner and utilized as a fuel. The "producer gas" has low heat content and may require supplementation with natural gas. In addition, the source would like the ability to burn No. 2 fuel oil and "Nature's Fuel Bio-Oil," which is the type of oil generated on site.

The source requested that IDEM revise the permit to clarify that the feedstock will not always consist of 100 percent wood and wood waste. Since the majority of the wood used at this source comes from manufacturing scrap, there is the possibility of the presence of non-wood materials. As a result, the source has requested the ability to process feedstock in the pyrolysis unit that contains at least 97% wood and no more than 3% non-wood materials. In addition, the source has provided IDEM with a list of materials they will or will not use in the pyrolysis unit (See PTE of the Entire Source After Issuance of the FESOP Revision below for more details). All feedstock will be kept in a separate enclosed building. The source also requested that the permit be revised to indicate that the pyrolysis unit is controlled by the same baghouse that controls the char load out system. In addition, this baghouse uses carbon to control dioxin and furans emissions and lime injection to control hydrochloric acid emissions. The source has also requested to install 16 bio-oil storage tanks, 2 diesel fuel storage tanks, and 1 No. 2 fuel oil storage tank.

On January 14th and 15th of 2010, the source performed stack testing of the pyrolysis unit. Based on the results of the stack test, the source has requested to revise the existing VOC emission limit and throughput limit. In order to comply with the revised VOC limit, the source plans to modify the pyrolysis unit such that the uncondensed gases are routed into the combustion box that feeds heat to the pyrolysis unit. The source expects the burning or co-burning of the VOC and CO present in these gases to greatly reduce the VOC and CO emissions from the pyrolysis stack. In addition, the source requested that the maximum capacity of the pyrolysis unit be decreased from 10 tons per hour to 4.5 tons per hour.

Upon further review, IDEM has determined that the potential to emit HAPs calculations for the pyrolysis unit were incorrectly calculated. Therefore, the unlimited and limited potential to emit calculations for the entire source have been updated. The correct unlimited potential to emit Total HAPs and HCl is 42.78 tons per year and 42.38 tons per year, respectively. As a result, a new HCl limit for the pyrolysis unit will be included in the permit. In addition, based on U.S. EPA applicability determinations, IDEM has determined that this source is a chemical process plant since it operates under Standard Industrial Classification Major Group 28 - Chemicals and Allied Products Establishments. Therefore, this source is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7.

The following is a list of the new/modified emission units and pollution control devices:

- (a) One (1) combustion box, constructed in 2008, approved for modification in 2010, equipped with a 5.0 MMBtu/hr burner, using natural gas, No. 2 fuel oil, bio gas, or bio-oil to generate heat for the pyrolysis unit.
- (b) One (1) pyrolysis unit, identified as EU-1, constructed in 2008, approved for modification in 2010, with a maximum capacity of 4.5 tons of feedstock per hour, using a baghouse, identified as CE-01, for particulate control, carbon injection for dioxin and furans control, and lime injection for hydrochloric acid control, and exhausting to stack S1.
- (c) One (1) bio-oil storage tank, identified as Tank A, approved for construction in 2010, with a maximum storage capacity of 18,000 gallons.
- (d) Two (2) bio-oil storage tanks, identified as Tank B and C, approved for construction in 2010, with a maximum storage capacity of 8,800 gallons, each.
- (e) One (1) bio-oil storage tank, identified as Tank D, approved for construction in 2010, with a maximum storage capacity of 22,500 gallons.
- (f) One (1) diesel fuel storage tank identified as Tank E, approved for construction in 2010, with a maximum storage capacity of 18,000 gallons.
- (g) One (1) bio-oil storage tank, identified as Tank F, approved for construction in 2010, with a maximum storage capacity of 11,500 gallons.
- (h) One (1) bio-oil storage tank, identified as Tank G, approved for construction in 2010, with a maximum storage capacity of 12,000 gallons.
- (i) Seven (7) bio-oil storage tanks, identified as Tank H through N, approved for construction in 2010, with a maximum storage capacity of 14,000 gallons, each.
- (j) One (1) bio-oil storage tank identified as T-1, approved for construction in 2010, with a maximum storage capacity of 7,200 gallons.
- (k) One (1) bio-oil storage tank, identified as T-2, approved for construction in 2010, with a maximum storage capacity of 6,200 gallons.

- (l) One (1) bio-oil storage tank, identified as T-3, approved for construction in 2010, with a maximum storage capacity of 1,000 gallons.
- (m) One (1) No. 2 fuel oil storage tank, identified as T-4, approved for construction in 2010, with a maximum storage capacity of 300 gallons.
- (n) One (1) bio-oil storage tank, identified as T-5, approved for construction in 2010, with a maximum storage capacity of 9,000 gallons.
- (o) Two (2) enclosed submerged filled bio-oil storage tanks, identified as T-6 and T-7, approved for construction in 2010, with a maximum storage capacity of 500 gallons, each.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations. Alternative emission factors have been provided by the source for the combustion of the "producer gas."

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Pyrolysis Unit (Process)	0	0	0	0	0	0	0	42.78	42.38 HCl
Fuel Combustion (Worst Case)	0.27	0.35	0.35	11.09	1.49	0	0	0	0
Storage Tanks	0	0	0	0	0	negl.	0	0	0
Unpaved Roads	0.57	0.14	0.14	0	0	0	0	0	0
Total PTE of Proposed Revision*	0.84	0.49	0.49	11.09	1.49	negl.	0	42.78	42.38 HCl

negl. = negligible
 * The total PTE of the proposed revision includes fugitive and non-fugitive emissions, since this source is considered 1 of the 28 listed source categories as specified in 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7.

This FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f)(1)(G), because the revision involves a modification with potential to emit (PTE) greater than 10 tons per year of a single HAP. This FESOP is also being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(g)(1) because it involves a modification that triggers newly applicable requirements for the pyrolysis unit. Finally, this FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(g)(2) because it involves adjustment to the existing source-wide emissions limitations to maintain the FESOP status of the source (see PTE of the Entire Source After The Issuance of the FESOP Revision Section).

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source reflecting adjustment of existing limits, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM10 ¹	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Raw Material Processing Area²				0	0	0	0	0	0
Pyrolysis (Process)^{2,3}	86.74	86.74	86.74	53.3	52.14	24.59	4.93	1.99	1.65 HCl
Char Load Out System²				0	0	0	0	0	0
Pyrolysis (Process)	53	86.6	86.6	89.6	87.7	24.8	8.3	0.05	0.039 Hexane
Fuel Combustion (Worst Case)	0.40	0.60	0.60	11.19	6.81	0.21	2.58	0.04	0.039 Hexane
Char load-out system	8.6	8.6	8.6	0	0	0	0	0	0
Storage Tanks	0	0	0	0	0	negl.	0	0	0
Insignificant Activities	4	4	4	4	4	4	4	0	0
Unpaved Roads	0.57	0.14	0.14	0	0	0	0	0	0
Total PTE of Entire Source ⁴	65.6 91.70	99.2 91.48	99.2 91.48	93.6 68.49	91.7 62.95	28.8 28.79	12.3 11.52	0.05 2.03	0.039-1.65 HCl
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	100	100	100	100	100	100	100	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA

negl. = negligible
¹ Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
² Baghouse CE-01 controls PM, PM10, and PM2.5 emissions from all three units. Therefore, the PM, PM10, and PM2.5 emission limits have been combined in order to render the requirements of 326 IAC 2-2 and 326 IAC 2-7 not applicable.
³ VOC emissions limited in order to render the requirements of 326 IAC 8-1-6 not applicable.
⁴ Limited PTE includes fugitive and non-fugitive emissions, since this source is considered 1 of the 28 listed source categories as specified in 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7. Prior to the re-evaluation of this source as 1 of the 28 listed source categories, the entire source has been limited to less than 100 tons per year, including fugitive emissions.

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted)

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)								
	PM	PM10 ¹	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Raw Material Processing Area ²	86.74	86.74	86.74	0	0	0	0	0	0
Pyrolysis (Process) ^{2,3}				53.3	52.14	24.59	4.93	1.99	1.65 HCl
Char Load Out System ²				0	0	0	0	0	0
Fuel Combustion (Worst Case)	0.40	0.60	0.60	11.19	6.81	0.21	2.58	0.04	0.039 Hexane
Storage Tanks	0	0	0	0	0	negl.	0	0	0
Insignificant Activities	4	4	4	4	4	4	4	0	0
Unpaved Roads	0.57	0.14	0.14	0	0	0	0	0	0
Total PTE of Entire Source⁴	91.70	91.48	91.48	68.49	62.95	28.79	11.52	2.03	1.65 HCl
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	100	100	100	100	100	100	100	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	Na	NA	NA	NA	NA
negl. = negligible ¹ Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". ² Baghouse CE-01 controls PM, PM10, and PM2.5 emissions from all three units. Therefore, the PM, PM10, and PM2.5 emission limits have been combined in order to render the requirements of 326 IAC 2-2 and 326 IAC 2-7 not applicable. ³ VOC emissions limited in order to render the requirements of 326 IAC 8-1-6 not applicable. ⁴ Limited PTE includes fugitive and non-fugitive emissions, since this source is considered 1 of the 28 listed source categories as specified in 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7. Prior to the re-evaluation of this source as 1 of the 28 listed source categories, the entire source has been limited to less than 100 tons per year, including fugitive emissions.									

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) PM10 emissions from baghouse CE-01, which controls emissions from the raw material processing area, pyrolysis unit, and char load out system shall not exceed 19.8 pounds per hour.
- (2) PM2.5 emissions from baghouse CE-01, which controls emissions from the raw material processing area, pyrolysis unit, and char load out system shall not exceed 19.8 pounds per hour.

- (3) The source shall only pyrolyze feedstock containing at least 97% wood and no more than 3% of the following materials unless defined as hazardous in 40 CFR: animal and organic offal, animal feed wastes, asphalt, biogenic plant wastes, carbon, carpet, char, charcoal, or coals, dairy wastes, fabrics, textiles, woven materials, fats, foams, including styrofoams, food wastes, grease, lawn waste, leather, lime, linoleum, flexible floor tiles, manure, mycelium, non hazardous solvents, paints, latex, or coatings, oils, packaging, paper products, pharmaceutical wastes, plastics, polymers, resins, rubber, sugars, tar, textiles, tires, and waxes.
- (4) The source shall not pyrolyze materials that contain any of the following items: asbestos, ash, batteries, bottled gases, cathode ray devices, chlorinated solvents, sealed containers, explosives, fertilizers, fiberglass or rock wool insulation, glass, hazardous light bulbs, herbicides, insecticides, insulation other than foam, solids or sludges classified as hazardous in 40 CFR, lead based paints or coatings, liquids or sludges with a flash point of less than 140°F, medical surgical wastes, metals, PCB laden oils or solvents, poisons, propane tanks, radioactive wastes, rocks, brick, salts, and sands.
- (5) The annual feedstock throughput rate to the pyrolysis unit shall not exceed 33,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (6) SO₂ emissions from the pyrolysis unit, which exhausts to stack S1, shall not exceed 3.23 pounds of SO₂ per ton of feedstock processed.
- (7) NO_x emissions from the pyrolysis unit, which exhausts to stack S1, shall not exceed 3.16 pounds of NO_x per ton of feedstock processed.
- (8) HCl emissions from the pyrolysis unit, which exhausts to stack S1, shall not exceed 0.1 pounds of HCl per ton of feedstock processed.

Since baghouse CE-01 controls the particulate matter emissions from the raw material processing area, pyrolysis unit, and char load out system new PM, PM₁₀, and PM_{2.5} emission limits have been included. In order to clarify what materials the source is permitted to use as feedstock in the pyrolysis unit new feedstock limits have been included in the permit. In addition, the existing feedstock throughput limit was decreased and a new HCl emission limit was added.

Compliance with these limits, combined with the potential to emit PM₁₀, PM_{2.5}, SO₂, NO_x, and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of PM₁₀, PM_{2.5}, SO₂, and NO_x to less than 100 tons per 12 consecutive month period, each, any single HAP less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

(b) PSD Minor Source

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

- (1) PM emissions from baghouse CE-01, which controls emissions from the raw material processing area, pyrolysis unit, and char load out system shall not exceed 19.8 pounds per hour.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR Part 60, Subpart Kb) (326 IAC 12) are not included in the permit for the storage tanks. The construction of the storage tanks will commence after July 23, 1984 and the bio-oil storage tank (Tank D) has a capacity greater than 75 cubic meters (19,813 gallons) and less than 151 cubic meters (39,890 gallons). However, this tank will not store liquids with a maximum true vapor pressure greater than 15.0 kPa. The remaining storage tanks each have a maximum capacity less than 75 cubic meters (19,813 gallons).
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Chemical Manufacturing Area Sources, 40 CFR 63.11494, Subpart VVVVVV, are not included for this source because no HAPs as listed in Table 1 to this subpart are present in the process fluids at concentrations greater than 0.1 percent for carcinogens, as defined by the Occupational Safety and Health Administration at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens. Based on the "Nature's Fuel Bio-Oil" material safety data sheet the oil contains less than 0.1% of any metal compounds.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source

will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HAPs from the pyrolysis unit is greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from the pyrolysis unit to 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, the proposed revision is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) 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.
 - (2) 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.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

Raw Material Processing Area

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the raw material processing area shall not exceed 19.18 pounds per hour when operating at a process weight rate of 10 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

The baghouse shall be in operation at all times the raw material processing area is in operation, in order to comply with this limit.

Combustion Box

- (a) 326 IAC 7-1.1-2 (Sulfur Dioxide (SO₂) Emission Limitations)
The combustion box is not subject to the requirements of 326 IAC 7-1.1-2, because the potential

to emit sulfur dioxide is less than twenty-five (25) tons per year.

Pyrolysis Unit

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

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the pyrolysis shall not exceed 11.23 pounds per hour when operating at a process weight rate of 4.5 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

The baghouse shall be in operation at all times the pyrolysis unit is in operation, in order to comply with this limit.

- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The unlimited VOC potential emissions from the pyrolysis unit is greater than twenty-five (25) tons per year. However, the source shall limit the VOC potential emissions from the pyrolysis unit to less than twenty-five (25) tons per year. Therefore, the proposed revision is not subject to the requirements of 326 IAC 8-1-6.

In order to render the requirements of 326 IAC 8-1-6 not applicable, the pyrolysis unit shall be limited as follows:

- (1) The annual feedstock throughput rate to the pyrolysis unit shall not exceed 33,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (2) VOC emissions from the pyrolysis unit shall not exceed 1.49 pounds of VOC per ton of feedstock processed.

Compliance with these limits shall limit the potential to emit VOC from the pyrolysis unit to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

- (c) There are no other 326 IAC 8 Rules that are applicable to the pyrolysis unit
- (d) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (e) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Char Load Out System

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

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the char load out system shall not exceed 11.23 pounds per hour when operating at a process weight rate of 4.5 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

The baghouse shall be in operation at all times the char load out system is in operation, in order to comply with this limit.

Storage Tanks

- (a) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
 Each new storage tank is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each new storage tank is less than twenty-five (25) tons per year.
- (b) 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)
 The new storage tanks are not subject to the requirements of 326 IAC 8-4-3 because they are not petroleum liquid storage vessels with capacities greater than thirty-nine thousand (39,000) gallons.
- (c) 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)
 The new storage tanks are not subject to the requirements of 326 IAC 8-9 because this source is not located in Clark, Floyd, Lake, or Porter Counties.
- (d) 326 IAC 12 (New Source Performance Standards)
 See Federal Rule Applicability Section of this TSD.
- (e) 326 IAC 20 (Hazardous Air Pollutants)
 See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring and Testing Requirements
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- (a) The compliance determination and monitoring requirements applicable to this proposed revision are as follows:

Emission Unit/Control	Operating Parameters	Frequency
Pyrolysis Unit, Raw Material Processing Area, and Char Load Out System/Baghouse CE-01	Pressure Drop	Once per day
Pyrolysis Unit, Raw Material Processing Area, and Char Load Out System/Baghouse CE-01	Visible Emissions	Once per day

- (b) The testing requirements applicable to this proposed revision are as follows (Note these tests are in addition to the testing requirements already required in the existing permit):

Testing Requirements				
Emission Unit	Control Device	Pollutant	Timeframe for Testing	Frequency of Testing
Raw Material Processing Area, Pyrolysis Unit, and Char Load Out System	Baghouse CE-01, with carbon and lime injection	PM, PM10, and PM2.5	Not later than 180 days after issuance of this permit ¹	Once every five (5) years
Pyrolysis Unit	Baghouse CE-01, with carbon and lime injection	HCl	Not later than five (5) years from the date of the last valid compliance determination ²	Once every five (5) years

- (1) PM, PM10, and PM2.5 emissions from the raw material processing area, pyrolysis unit, and char load out system are all controlled by baghouse CE-01, which exhausts to stack S1. On January 14 and 15 of 2010, the source performed PM and PM10 testing of the pyrolysis unit as specified in the permit. However, the worst case operating scenario for baghouse CE-01 is when the raw material processing area, pyrolysis unit, and char load out system are in operation at the same time. Therefore, in order to demonstrate compliance with 326 IAC 2-2, the Permittee shall perform PM testing of baghouse CE-01, which controls PM emissions from the raw material processing area, pyrolysis unit, and char load out system not later than 180 days after the issuance date of FESOP No. 085-28516-00115, utilizing methods approved by the commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

In addition, in order to demonstrate compliance with 326 IAC 2-8-4, the Permittee shall perform PM10 and PM2.5 testing of baghouse CE-01, which controls PM10 and PM2.5 emissions from the raw material processing area, pyrolysis unit, and char load out system, not later than 180 days after final promulgation of the new or revised condensable PM test method(s) referenced in the U.S. EPA's Final Rule for Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers (PM2.5), signed on May 8th, 2008 or not later than 180 days after the issuance date of FESOP No. 085-28516-00115, whichever is later. This testing shall be conducted utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

- (2) On January 14 and 15th of 2010, the source performed SO₂, NO_x, VOC, dioxin and furans, and HCl testing on the pyrolysis unit. The results from these test have been approved by IDEM. As a result, in order to demonstrate compliance with 326 IAC 2-8-4, the source shall perform HCl testing on the pyrolysis unit not later than five (5) years from the date of the most recent valid compliance demonstration. This testing shall be conducted utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

Proposed Changes

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:
 - (1) Sections A.2, A.3, and D.1 have been revised in order to properly reflect the current emission units and processes at this source.
 - (2) New feedstock limits and HCl emission limit have been included in Condition D.1.1. In addition, the existing feedstock throughput limit for the pyrolysis unit has been decreased.
 - (3) A new condition has been added to the permit, which contains new PM, PM10, and PM2.5 emission limits for baghouse CE-01. The existing PM10 emission limit found in

Condition D.1.1 has been removed from the permit.

- (4) The existing feedstock throughput limit and VOC emission limit have been revised in order to render the requirements of 326 IAC 8-1-6 not applicable to the pyrolysis unit.
- (5) Condition D.1.4 (Original Condition D.1.3) has been updated to include the raw material processing area and char load out system. In addition, the allowable particulate emission rate for the pyrolysis unit has been updated due to the decrease in process weight.
- (6) Original Condition D.1.5 - Particulate has been removed from the permit. New particulate control requirements can be found in Condition D.1.7.
- (7) Condition D.1.6 has been revised to include revised testing requirements for PM and PM10 and new testing requirements for PM2.5 and HCl.
- (8) Condition D.1.7 has been revised to clarify when the baghouse must operate. In addition, a new lime injection requirement has been included.
- (9) Conditions D.1.8 and D.1.9 have been updated to include the raw material processing area and pyrolysis unit, which use baghouse CE-01 for particulate control and exhaust to stack S1. In addition, new parametric monitoring requirements have been included for the lime injection system, which controls HCl emissions from the pyrolysis unit.
- (10) The existing record keeping and reporting requirements in Conditions D.1.11 and D.1.12 have been revised to include the raw material processing area and pyrolysis unit. In addition, new recordkeeping requirements have been included for the injection of lime in baghouse CE-01.
- (11) The FESOP Quarterly Report for feedstock usage has been updated to reflect the revised annual feedstock throughput limit.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) **One (1) enclosed raw material processing area, constructed in 2008, with a maximum capacity of 10 tons per hour, using a baghouse, identified as CE-01, for particulate control, exhausting to stack S1, and consisting of the following:**
 - (1) **One (1) magnetic separator system;**
 - (2) **One (1) 6' x 20' feed box;**
 - (3) **One (1) conveyor system;**
 - (4) **One (1) rotary trommel screen;**
 - (5) **One (1) rotary dryer, using heat vented from the pyrolysis unit, and exhausting to stack S1; and**
 - (6) **One (1) screw auger feeder.**
- (b) **One (1) combustion box, constructed in 2008, approved for modification in 2010, equipped with a 5.0 MMBtu/hr burner, using natural gas, No. 2 fuel oil, producer gas, or bio-oil to generate heat for the pyrolysis unit.**

- (ac) One (1) pyrolysis unit, identified as EU-1, approved for construction in 2008, with a maximum capacity of ~~40~~ **4.5 tons of feedstock** per hour, using ~~no control~~ **a baghouse, identified as CE-01, for particulate control, carbon injection for dioxin and furans control, and lime injection for hydrochloric acid control,** and exhausting to stack S1.
- (d) **One (1) bio gas condenser.**
- (e) **One (1) water evaporator utilizing waste heat from the pyrolysis unit.**
- (f) **One (1) flash evaporator tank, with a maximum capacity of 9,000 gallons.**
- (bg) One (1) enclosed char load out system, ~~approved for construction~~ **approved** in 2008, using a baghouse, identified as CE-01, for a particulate control, exhausting to stack ~~SE-01~~, the system consisting of the following:
 - (1) **a One (1) char load out auger system;**
 - (2) **a One (1) char chiller system;**
 - (3) **a One (1) magnetic separator system;**
 - (4) **a One (1) char screen system; and**
 - (5) **a One (1) char storage containers for the char, identified as a Gayload boxes.**

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(l)]

This stationary source ~~has~~ **also includes the** following insignificant activities, as defined in 326 IAC 2-7-1(21).

- (a) **One (1) bio-oil storage tank, identified as Tank A, approved for construction in 2010, with a maximum storage capacity of 18,000 gallons.**
- (b) **Two (2) bio-oil storage tanks, identified as Tank B and C, approved for construction in 2010, with a maximum storage capacity of 8,800 gallons, each.**
- (c) **One (1) bio-oil storage tank, identified as Tank D, approved for construction in 2010, with a maximum storage capacity of 22,500 gallons.**
- (d) **One (1) diesel fuel storage tank identified as Tank E, approved for construction in 2010, with a maximum storage capacity of 18,000 gallons.**
- (e) **One (1) bio-oil storage tank, identified as Tank F, approved for construction in 2010, with a maximum storage capacity of 11,500 gallons.**
- (f) **One (1) bio-oil storage tank, identified as Tank G, approved for construction in 2010, with a maximum storage capacity of 12,000 gallons.**
- (g) **Seven (7) bio-oil storage tanks, identified as Tank H through N, approved for construction in 2010, with a maximum storage capacity of 14,000 gallons, each.**
- (h) **One (1) bio-oil storage tank identified as T-1, approved for construction in 2010, with a maximum storage capacity of 7,200 gallons.**
- (i) **One (1) bio-oil storage tank, identified as T-2, approved for construction in 2010,**

with a maximum storage capacity of 6,200 gallons.

- (j) **One (1) bio-oil storage tank, identified as T-3, approved for construction in 2010, with a maximum storage capacity of 1,000 gallons.**
- (k) **One (1) No. 2 fuel oil storage tank, identified as T-4, approved for construction in 2010, with a maximum storage capacity of 300 gallons.**
- (l) **One (1) bio-oil storage tank, identified as T-5, approved for construction in 2010, with a maximum storage capacity of 9,000 gallons.**
- (m) **Two (2) enclosed submerged filled bio-oil storage tanks, identified as T-6 and T-7, approved for construction in 2010, with a maximum storage capacity of 500 gallons, each.**
- (en) Three (3) 7,000 gallon above ground fuel tanks.
- ~~(d) One (1) natural gas-fired combustion unit with a maximum heat input rate of 5 MMBtu.~~
- (o) **Enclosed raw material storage piles.**
- (ep) Unpaved roads and parking lots.

...
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-8]:

- (a) **One (1) enclosed raw material processing area, constructed in 2008, with a maximum capacity of 10 tons per hour, using a baghouse, identified as CE-01, for particulate control, exhausting to stack S1, and consisting of the following:**
 - (1) **One (1) magnetic separator system;**
 - (2) **One (1) 6' x 20' feed box;**
 - (3) **One (1) conveyor system;**
 - (4) **One (1) rotary trommel screen;**
 - (5) **One (1) rotary dryer, using heat vented from the pyrolysis unit, and exhausting to stack S1; and**
 - (6) **One (1) screw auger feeder.**
- (b) **One (1) combustion box, constructed in 2008, approved for modification in 2010, equipped with a 5.0 MMBtu/hr burner, using natural gas, No. 2 fuel oil, producer gas, or bio-oil to generate heat for the pyrolysis unit.**
- (ac) **One (1) pyrolysis unit, identified as EU-1, approved for construction in 2008, with a maximum capacity of 4.5 tons of feedstock per hour, using ~~no control~~ a baghouse, identified as CE-01, for particulate control, carbon injection for dioxin and furans control, and lime injection for hydrochloric acid control, and exhausting to stack S1.**
- (d) **One (1) bio gas condenser.**

- (e) **One (1) water evaporator utilizing waste heat from the pyrolysis unit.**
- (f) **One (1) flash evaporator tank, with a maximum capacity of 9,000 gallons.**
- (bg) One (1) enclosed char load out system, ~~approved for construction~~ **erected** in 2008, using a baghouse, identified as CE-01, for a particulate control, exhausting to stack SE-01, the system consisting of the following:
 - (1) a **One (1)** char load out auger system;
 - (2) a **One (1)** char chiller system;
 - (3) a **One (1)** magnetic separator system;
 - (4) a **One (1)** char screen system; **and**
 - (5) a **One (1) char storage** containers for the char, identified as a Gayload boxes.
- ~~(c) Three (3) 7,000 gallon above ground fuel tanks.~~
- ~~(d) One (1) natural gas-fired combustion unit with a maximum heat input rate of 5 MMBtu.~~
- ...

D.1.1 FESOP Limits [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4, the PM10, SO2, and NOx emissions from the pyrolysis unit shall be as follows **Permittee shall comply with the following:**

- ~~(1) The PM10 emissions shall not exceed 3.1 pounds PM10 per ton of the feedstock to the pyrolysis, and the amount of the feedstock shall not exceed 55,500 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;~~
- ~~(2) The SO2 emissions shall not exceed 3.2 pounds SO2 per ton of the feedstock to the pyrolysis, and the amount of the feedstock shall not exceed 55,500 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;~~
- ~~(3) The NOx emissions shall not exceed 3.16 pounds NOx per ton of the feedstock to the pyrolysis, and the amount of the feedstock shall not exceed 55,500 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;~~
- (a) **The Permittee shall only pyrolyze feedstock containing at least 97% wood and no more than 3% of the following materials unless defined as hazardous in 40 CFR: animal and organic offal, animal feed wastes, asphalt, biogenic plant wastes, carbon, carpet, char, charcoal, or coals, dairy wastes, fabrics, textiles, woven materials, fats, foams, including styrofoams, food wastes, grease, lawn waste, leather, lime, linoleum, flexible floor tiles, manure, mycelium, non hazardous solvents, paints, latex, or coatings, oils, packaging, paper products, pharmaceutical wastes, plastics, polymers, resins, rubber, sugars, tar, textiles, tires, and waxes.**
- (b) **The Permittee shall not pyrolyze materials that contain any of the following items: asbestos, ash, batteries, bottled gases, cathode ray devices, chlorinated solvents, sealed containers, explosives, fertilizers, fiberglass or rock wool insulation, glass, hazardous light bulbs, herbicides, insecticides, insulation other than foam, solids or sludges classified as hazardous in 40 CFR, lead based paints or coatings,**

liquids or sludges with a flash point of less than 140°F, medical surgical wastes, metals, PCB laden oils or solvents, poisons, propane tanks, radioactive wastes, rocks, brick, salts, and sands.

- (c) The annual feedstock throughput rate to the pyrolysis unit shall not exceed 33,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (d) SO₂ emissions from the pyrolysis unit, which exhausts to stack S1, shall not exceed 3.23 pounds of SO₂ per ton of feedstock processed.
- (e) NO_x emissions from the pyrolysis unit, which exhausts to stack S1, shall not exceed 3.16 pounds of NO_x per ton of feedstock processed.
- (f) HCl emissions from the pyrolysis unit, which exhausts to stack S1, shall not exceed 0.1 pounds of HCl per ton of feedstock processed.

Compliance with these limits, combined with the potential to emit of PM₁₀, SO₂, and NO_x, and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of PM₁₀, SO₂, and NO_x to less than 100 tons per year, each, any single HAP less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

D.1.2 PM, PM₁₀, and PM_{2.5} Limits [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 and in order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

- (a) PM emissions from baghouse CE-01, which controls emissions from the raw material processing area, pyrolysis unit, and char load out system shall not exceed 19.8 pounds per hour.
- (b) PM₁₀ emissions from baghouse CE-01, which controls emissions from the raw material processing area, pyrolysis unit, and char load out system shall not exceed 19.8 pounds per hour.
- (c) PM_{2.5} emissions from baghouse CE-01, which controls emissions from the raw material processing area, pyrolysis unit, and char load out system shall not exceed 19.8 pounds per hour.

Compliance with these limits, combined with Conditions D.1.1(a), D.1.1(b), and the potential to emit PM, PM₁₀, and PM_{2.5} from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM₁₀, and PM_{2.5} to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Program) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.23 VOC Limits [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 not applicable, VOC emissions from the pyrolysis unit shall be limited as follows: not exceed 0.89 pounds VOC per ton of the feedstock, and the amount of the feedstock shall not exceed 55,500 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

- (a) The annual feedstock throughput rate to the pyrolysis unit shall not exceed 33,000

tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (b) VOC emissions from the pyrolysis unit shall not exceed 1.49 pounds of VOC per ton of feedstock processed.**

Compliance with ~~this~~ **these** limits, in conjunction with Conditions D.1.1(a) and (b), shall limit the potential to emit VOC from the pyrolysis unit to less than 25 tons per 12 consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities New Facilities) not applicable.

D.1.34 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, ~~the allowable~~ particulate emissions rate from the pyrolysis unit **each of following operations** shall not exceed ~~49.2~~ **the pounds per hour limits listed in the table below: when operating at a maximum process weight rate of 10 tons per hour.**

Unit Description	Baghouse ID	Max. Throughput Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
Raw Material Processing Area	CE-01	10	19.18
Pyrolysis Unit	CE-01	4.5	11.23
Char Load Out System	CE-01	4.5	11.23

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

D.1.45 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for ~~this pyrolysis unit~~ **these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.1.5 Particulate

~~In order to demonstrate compliance with D.1.3, the PM shall not exceed 1.92 pound per ton of the feedstock.~~

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

- (a) ~~Within~~ **No later than** one hundred and eighty (180) days after the initial startup, the Permittee shall perform ~~PM, PM₁₀,~~ SO₂, NO_x, and VOC testing in order to demonstrate compliance with Conditions D.1.1, ~~D.1.2,~~ and D.1.3 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. ~~PM-10 includes filterable and condensable PM-10.~~ Testing shall be conducted in accordance with **the provisions of 326 IAC 3-6 (Source Sampling Procedures).** Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.
- (b) Pursuant to 326 IAC 2-8-4, the Permitted shall perform dioxin and furans testing, ~~within~~ **no later than** one hundred and eighty (180) days after the initial startup. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with **the provisions of 326 IAC 3-6 (Source Sampling Procedures).** Section C - Performance

Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

- (c) In order to determine compliance with Condition D.1.1(f), the source shall perform HCl testing on the pyrolysis unit not later than five (5) years from the date of the most recent valid compliance demonstration, whichever is later. This testing shall be conducted utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.
- (d) In order to determine compliance with Conditions D.1.2(a) and D.1.4, the Permittee shall perform PM testing of baghouse CE-01, which controls PM emissions from the raw material processing area, pyrolysis unit, and char load out system not later than 180 days after the issuance date of FESOP No. 085-28516-00115, utilizing methods approved by the commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.
- (e) In order to determine compliance with Conditions D.1.2(b) and D.1.2(c), the Permittee shall perform PM10 and PM2.5 testing of baghouse CE-01, which controls PM10 and PM2.5 emissions from the raw material processing area, pyrolysis unit, and char load out system not later than 180 days after final promulgation of the new or revised condensable PM test method(s) referenced in the U.S. EPA's Final Rule for Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers (PM2.5), signed on May 8th, 2008 or not later than 180 days after the issuance date of FESOP No. 085-28516-00115, whichever is later. This testing shall be conducted utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

D.1.7 ~~PM10~~ Particulate and HCl Control

- (a) In order to comply with ~~Conditions D.1.42 and D.1.4~~ and D.1.4, the baghouse **for particulate control** shall be in operation ~~to~~ and control ~~PM-10 emissions~~ at all times ~~while~~ when the **raw material processing area, pyrolysis unit, and char load out system** ~~is~~ are in operation.
- (b) In order to comply with Condition D.1.1(f), the Permittee shall inject lime into the airstream of baghouse CE-01 at all times when the pyrolysis unit is in operation.
- (bc) 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.1.8 Visible Emissions Notations

- (a) Visible emission notations of the **raw material processing area, pyrolysis unit, and char load out system** stack exhaust 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.

...
D.1.9 Parametric Monitoring

- (a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the **raw material processing area, pyrolysis unit, and char load out process system**, at least once per day when the ~~process~~ **raw material processing area, pyrolysis unit, and char load out system** ~~is~~ **are** in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 8.0 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 or Exceedances~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** 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.
- (b) 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 **or replaced** at least once every six (6) months.
- (c) **The Permittee shall monitor the lime injection rate used with the pyrolysis unit at least once per day when the unit is in operation. When for any one reading, the lime injection rate is outside the normal range established during the most recent stack test, the Permittee shall take reasonable response. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. An injection rate reading that is outside the normal range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.**

...
D.1.11 Record Keeping Requirements

- (a) To document **the compliance status** with Conditions D.1.1(a), D.1.1(b), D.1.1(c), and D.1.23(a), the Permittee shall maintain **monthly** records of the amount **and types** ~~delivered to the feeders per month~~ **of feedstock processed in the pyrolysis unit.**
- (b) To document **the compliance status** with Condition D.1.8, the Permittee shall maintain a daily record of the visible emissions from the **raw material processing area, pyrolysis unit, and char load out system** stack exhaust ~~controlling the char load out unit.~~ The Permittee shall include in its daily record when a visible emissions is not ~~observed~~ **taken and the reason for the lack of visible emission notation** (e.g. the process did not operate that day).
- (c) To document **the compliance status** with Condition D.1.9(a), the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the **raw material processing area, pyrolysis unit, and char load out unit system.** The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (d) **To document the compliance status with Condition D.1.9(c), the Permittee shall maintain a daily record of the lime injection rate used in conjunction with the**

pyrolysis unit. The Permittee shall include in its daily record when an injection rate reading is not taken and the reason for the lack of an injection rate reading (e.g. the process did not operate that day).

- (de) ~~These records shall be maintained in accordance with Section C - General Record Keeping Requirements~~ **contains the Permittee's obligations with regard to the records required by this condition.**

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance **status** with Conditions D.1.1(c) and D.1.23(a), shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within~~ **not later than** thirty (30) days after the end of the quarter being reported. **Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.** The report submitted by the Permittee does require ~~the a~~ certification **that meet the requirements of 326 IAC 2-8-5(a)(1)** by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

FESOP Quarterly Report

...

Facility: Pyrolysis **Unit**
Parameter: Amount of the feedstock
Limit: ~~The feedstock shall not exceed 55,500 tons per twelve (12) consecutive month period~~ **The annual feedstock throughput rate to the pyrolysis unit shall not exceed 33,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**

...

- (b) Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:
- (1) IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.
 - (2) Several of IDEM's branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to "Permit Administration and Development Section" and the "Permits Branch" have been changed to "Permit Administration and Support Section". References to "Asbestos Section", "Compliance Data Section", "Air Compliance Section", and "Compliance Branch" have been changed to "Compliance and Enforcement Branch". The permit has been revised as follows:

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
 - (3) Based on U.S. EPA applicability determinations, IDEM has determined that this source is a chemical process plant since it operates under Standard Industrial Classification Major Group 28 - Chemicals and Allied Products Establishments. Therefore, this source is

considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7.

- (4) For clarity, IDEM has changed references to the general conditions: *"in accordance with Section B"*, *"in accordance with Section C"*, or other similar language, to "Section C ... contains the Permittee's obligations with regard to the records required by this condition."
- (5) IDEM has decided that the phrases *"no later than"* and *"not later than"* are clearer than *"within"* in relation to the end of a timeline. Therefore, all timelines have been switched to *"no later than"* or *"not later than"* except for the timelines in Section B - Emergency Provisions because the underlying rule states for these conditions to specify *"within."*
- (6) Section B -Duty to Provide Information has been revised.
- (7) To clarify that Section B - Certification only states what a certification must be, IDEM has revised the condition. In addition, IDEM, OAQ has decided to clarify Section B - Certification to be consistent with the rule.
- (8) IDEM has decided to clarify what rule requirements a certification needs to meet. IDEM has decided to remove the last sentence dealing with the need for certification from the forms because the Conditions requiring the forms already address this issue.
- (9) IDEM, OAQ has decided to clarify Section B - Preventive Maintenance Plan to be consistent with the rule.
- (10) IDEM is revising Section B - Emergency Provisions to delete paragraph (h). 326 IAC 2-8-4(3) (C) (ii) allows that deviations reported under an independent requirement do not have to be included in the Quarterly Deviation and Compliance Monitoring Report.
- (11) IDEM has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information. Therefore, Section B - Permit Renewal has been revised.
- (12) IDEM has decided to reference 326 IAC 2 in Section B-Source Modification Requirements, rather than specific construction rule.
- (13) IDEM has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.
- (14) IDEM has revised Section C - Incineration to more closely reflect the two underlying rules.
- (15) IDEM has added Section C - Stack Height, since the pyrolysis unit has the potential to emit greater than 25 tons of PM and SO₂ before control.
- (16) IDEM has removed the first paragraph of Section C - Performance Testing because specific testing conditions elsewhere in the permit will specify the timeline and procedures.
- (17) IDEM has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.
- (18) IDEM has revised Section C - Compliance Monitoring. The reference to recordkeeping has been removed because other conditions already address recordkeeping. The voice of the condition has been changed to clearly indicate that it is the Permittee that must follow the requirements of the condition.

- (19) IDEM has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.
- (20) IDEM has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - Response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was switched from "the receipt of the test results" to "the date of the test." There was confusion if the "receipt" was by IDEM, the Permittee, or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.
- (21) The voice of paragraph (b) of Section C - General Record Keeping Requirements has been change to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.
- (22) IDEM, OAQ has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, IDEM has removed Section B - Deviation form Permit Requirements and Conditions and added the requirements of that condition to Section C - General Reporting Requirements. Paragraph (d) of Section C - General Reporting Requirements has been removed because IDEM already states the timeline and certification needs of each report in the condition requiring the report.
- (23) IDEM has decided to simplify the referencing in Section C - Compliance with 40 CFR 82 and 326 IAC 22-1.
- (24) IDEM has decided to clarify Section D - Testing Requirements (see changes above).
- (25) IDEM has included the replacement of an instrument as an acceptable action (see change above).
- (26) Paragraphs (a and b) of Condition D.1.9 (Original Condition D.1.10 - Broken or Failed Bag Detection) have been deleted and replaced with a conditions specific to single compartment baghouses which control emissions from continuously operating and batch processes.
- (27) The word "status" has been added to Section D - Reporting Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this (see changes above).
- (28) The phrase "of this permit" has been added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report to match the underlying rule.

Mailing Address: 421 East Cook Road, Suite 400, Fort Wayne, IN 46825

...

A.1 General Information [326 IAC 2-8-3(b)]

...

Source Status: Federally Enforceable State Operating Permit Program
Minor Source, under PSD and Emission Offset Rules
Minor Source, Section 112 of the Clean Air Act
Net 1 of 28 Source Categories

...

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

~~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 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

~~(a) This permit, F 085-26494-00115, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.~~

~~(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.~~

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

~~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 2-8-6]

~~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 2-8-4(4)]

~~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 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(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 an "authorized~~

individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

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

~~B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]~~

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

~~B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]~~

- (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 46204-2254

- (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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

~~B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]~~

~~IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.~~

~~B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]~~

~~(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 46204-2254~~

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

~~(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

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

~~B.12 Emergency Provisions [326 IAC 2-8-12]~~

~~(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.~~

~~(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly~~

~~signed, contemporaneous operating logs or other relevant evidence that describe the following:~~

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

~~Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.~~

- ~~(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 46204-2254~~

~~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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(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 2-8-3(c)(6) 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 2-8 and any other applicable rules.~~
- (g) ~~Operations may continue during an emergency only if the following conditions are met:~~
- (1) ~~If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~
- (2) ~~If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~
- (A) ~~The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~
- (B) ~~Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.~~
- ~~Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~
- (h) ~~The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.~~

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

- (a) ~~All terms and conditions of permits established prior to F 085-26494-00115 and issued pursuant to permitting programs approved into the state implementation plan have been either:~~
- (1) ~~incorporated as originally stated,~~
- (2) ~~revised, or~~
- (3) ~~deleted.~~
- (b) ~~All previous registrations and permits are superseded by this permit.~~

B.14 ~~Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]~~

~~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 2-8-3(h) and 326 IAC 2-8-9.~~

~~B.15 — Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]~~

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

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

~~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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(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 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]~~

- ~~(a) — This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(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 2-8-8(a)]~~

- ~~(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 2-8-8(b)]~~

- ~~(d) — The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]~~

~~B.17 — Permit Renewal [326 IAC 2-8-3(h)]~~

- ~~(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 2-8-3. 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~Request for renewal shall be submitted to:~~

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

~~(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 2-8 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 Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]~~

~~(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 46204-2254~~

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

~~(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]~~

~~B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]~~

~~(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:~~

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

- (2) — Any approval required by 326 IAC 2-8-11.1 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 46204-2254

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 2-8-15(b) through (d). 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 2-8-15(b)(2), (c)(1), and (d).

- (b) — Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) — Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) — 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.20 — Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 — Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

~~B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]~~

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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 46204-2254

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

~~B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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) 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.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]~~

- ~~(a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.~~
- ~~(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.~~

~~B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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 B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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

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

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

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

B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F085-26494-00115, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

B.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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.7 Severability [326 IAC 2-8-4(4)]

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

B.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(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. 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.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (i) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
 - (ii) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (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 2-8-4(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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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 and Enforcement 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Northern 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 and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (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 and Enforcement 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 2-8-4(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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F085-26494-00115 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (4) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.18 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, 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 2-8 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, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251**

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 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
Permit Administration and Support Section, 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 2-8-15(b) through (d). 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 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) **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 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than 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) 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 2-8-4(3)][326 IAC 2-8-5][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 2-8-4(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 Overall Source Limit [326 IAC 2-8] [326 IAC 2-2]~~

~~The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.~~

~~(a) Pursuant to 326 IAC 2-8:~~

- ~~(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.~~
- ~~(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and~~
- ~~(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period.~~

~~(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.~~

~~(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.~~

~~(d) Section D of this permit contains independently enforceable provisions to satisfy~~

~~_____ this requirement.~~

~~C.3 _____ Opacity [326 IAC 5-1]~~

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

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

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

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

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

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

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

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

~~C.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 46204-2254~~

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

- ~~(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(e). 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.~~

~~Testing Requirements [326 IAC 2-8-4(3)]~~

~~G.8 Performance Testing [326 IAC 3-6]~~

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

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

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

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

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

~~Compliance Requirements [326 IAC 2-1.1-11]~~

~~C.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 2-8-4][326 IAC 2-8-5(a)(1)]~~

~~C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(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 46204-2254~~

~~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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

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

~~C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]~~

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

~~C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]~~

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

~~Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]~~

~~C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]~~

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

- ~~(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.~~
- ~~(b) These ERPs shall be submitted for approval to:~~
- ~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251~~
- ~~within ninety (90) days after the date of issuance of this permit.~~
- ~~The ERP does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.~~
- ~~(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~
- ~~(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~
- ~~(f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]~~

~~C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]~~

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

~~C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]~~

- ~~(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 2-8-4][326 IAC 2-8-5]~~

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

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

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

~~C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]~~

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

~~C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]~~

- ~~(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(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 46204-2254~~
- ~~(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(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.~~

~~Stratospheric Ozone Protection~~

~~C.19 Compliance with 40 CFR 82 and 326 IAC 22-1~~

~~Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:~~

- ~~(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.~~
- ~~(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.~~
- ~~(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.~~

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

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

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

C.8 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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 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 that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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 2-8-4][326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 and Enforcement 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (c) 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 2-8-4][326 IAC 2-8-5(a)(1)]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

- (b) These ERPs shall be submitted for approval to:

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

no later than 180 days from the date on which this source commences operation.

The ERP does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
- (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner 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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (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 except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, 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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, 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.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

...

D.1.8 Visible Emissions Notations

- ...
- (e) When an abnormal emission is observed, the Permittee shall take reasonable response steps in accordance with ~~Section C - Response to Excursions and Exceedances~~. **Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps in accordance with ~~Section C - Response to Excursions and Exceedances~~ shall be considered a deviation from this permit.

...

D.1.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) ~~For multi-compartment units, if operations will continue for 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) ~~For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~
- (a) **For a single compartment baghouses 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 emission unit. 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's 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.

...
Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements **of this permit**, 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".

...
Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on September 30, 2009.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. 085-28516-00115. The staff recommends to the Commissioner that this FESOP Significant Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5375 or toll free at 1-800-451-6027 extension 4-5375.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Summary of Emissions

Company Name: Nature's Fuel
 Address City IN Zip: 510 E. Main St., Atwood, IN 46502
 Permit No.: 085-28516-00115
 Reviewer: Brian Williams

Unlimited Potential to Emit (tons/yr)									
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP
Raw Material Processing Area/Char Load Out System	37.54	37.54	37.54	0.0	0.0	0.0	0.0	0.0	0.0
Pyrolysis Unit (Process)	67.61	67.61	67.61	63.66	62.28	29.37	5.89	42.78	42.38 HCl
Fuel Combustion (Worst Case)*	0.40	0.60	0.60	11.19	6.81	0.21	2.58	0.04	0.039 Hexane
Insignificant Activities	4.0	4.0	4.0	4.0	4.0	4.0	4.0	0.0	0.0
Storage Tanks**	0	0.0	0.0	0.0	0.0	negl.	0.0	0.0	0.0
Unpaved Roads	0.57	0.14	0.14	0.0	0.0	0.0	0.0	0.0	0.0
Total	110.12	109.90	109.90	78.86	73.09	33.58	12.48	42.82	42.38 HCl

Limited Potential to Emit (tons/yr)									
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP
Raw Material Processing Area/Char Load Out System	86.74	86.74	86.74	0.0	0.0	0.0	0.0	0.0	0.0
Pyrolysis Unit (Process)				53.30	52.14	24.59	4.93	1.99	1.65 HCl
Fuel Combustion (Worst Case)*	0.40	0.60	0.60	11.19	6.81	0.21	2.58	0.04	0.039 Hexane
Insignificant Activities	4.0	4.0	4.0	4.0	4.0	4.0	4.0	0.0	0.0
Storage Tanks**	0.0	0.0	0.0	0.0	0.0	negl.	0.0	0.0	0.0
Unpaved Roads	0.57	0.14	0.1	0.0	0.0	0.0	0.0	0.0	0.0
Total	91.70	91.48	91.48	68.49	62.95	28.79	11.52	2.03	1.65 HCl

* In order to reduce CO and VOC emissions from the pyrolysis unit, the source will route the uncondensed "producer gases" from the pyrolysis unit back to the combustion box. The "producer gas" has a very low heating value, so the source will also have to use natural gas, No. 2 fuel oil, or "bio oil" to provide heat to the pyrolysis unit. Therefore, the potential to emit from fuel combustion has been determined as follows: Worst Case Emissions Per Pollutant from Natural Gas, No. 2 Fuel Oil, or Bio Oil + Producer Gas

** Emissions from the storage tanks were calculated using EPA TANKS software (version 4.09d) and determined to be negligible
 negl. = negligible

**Appendix A: Emissions Calculations
Pyrolysis Unit**

Company Name: Nature's Fuel
Source Address: 510 E. Main Street, Atwood, IN 46502
Permit Number: 085-28516-00115
Reviewer: Brian Williams

Unlimited Potential to Emit

Maximum Feedstock Rate = 4.5 tons/hr
 Maximum Throughput = 39,420 tons/yr

Criteria Pollutants	Uncontrolled ^(1,2) Emission Factors (lb/ton)	Unlimited/Uncontrolled Potential to Emit (tons/yr)
PM	3.430	67.6
PM10	3.430	67.6
PM2.5	3.430	67.6
SO2	3.230	63.7
NOx	3.160	62.3
CO	0.299	5.9
VOC	1.490	29.4

Methodology

Potential to Emit (tons/yr) = (Maximum Hourly feedstock (tons/hr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)*(8760hr/yr)

⁽¹⁾ All Emission Factors except VOC are from FIRE 6.25, dated October 18, 2004, Uncontrolled SCC 50300114 (Solid Waste Burned)

⁽²⁾ VOC emission factor from IDEM approved stack test conducted on January 14-15, 2010

Limited Potential to Emit

Limited Throughput = 33,000 tons/yr

Criteria Pollutants	Limited Emission Factors ^(1,2,3) (lb/ton)	Limited Potential to Emit (tons/yr)
PM	See Page 5	
PM10		
PM2.5		
SO2	3.230	53.3
NOx	3.160	52.1
CO	0.299	4.9
VOC	1.490	24.6

Methodology

Potential to Emit (tons/yr) = (Maximum Throughput (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)

⁽¹⁾ SO2, NOx, and CO emission factors from FIRE 6.25, dated October 18, 2004, Uncontrolled SCC 50300114 (Solid Waste Burned)

⁽²⁾ PM, PM10, and PM2.5 emissions will be controlled by a baghouse.

⁽³⁾ VOC emission factor from IDEM approved stack test conducted on January 14-15, 2010

**Appendix A: Emissions Calculations
Pyrolysis Unit
Hazardous Air Pollutants**

Company Name: Nature's Fuel
Source Address: 510 E. Main Street, Atwood, IN 46502
Permit Number: 085-28516-00115
Reviewer: Brian Williams

The following calculations determine the unlimited/uncontrolled HAP emissions from the pyrolysis

Maximum feedstock = 4.5 tons/hr
 Maximum Throughput = 39,420 tons/yr

Hazardous Air Pollutant	Unlimited/Uncontrolled Emission Factors (lb/ton)	Potential to Emit (tons/yr)
Arsenic	6.69E-04	1.32E-02
Cadmium	2.41E-03	4.75E-02
Chromium	3.31E-03	6.52E-02
Dioxin*	2.90E-06	5.72E-05
Hydrogen Chloride	2.15	42.38
Lead	2.82E-03	5.56E-02
Nickel	5.52E-03	1.09E-01
Mercury	5.60E-03	1.10E-01

Total HAPs 42.78
Worst Single HAP 42.38 HCl

Methodology

Unlimited/Uncontrolled Potential to Emit (tons/yr) = (Maximum Annual feedstock (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)

Emission Factors are from Fire Version 6.25, dated October 18, 2004, SCC 50300114 (Solid Waste Burned)

*dioxin = Chlorodibenzo-p-dioxin, chlorodibenzofurans total

HCL = Hydrogen Chloride

Limited Throughput = 33,000 tons/yr

Hazardous Air Pollutant	Limited Emission Factors (lb/ton) ^{1,2,3}	Limited Potential to Emit (tons/yr)
Arsenic	6.69E-04	1.10E-02
Cadmium	2.41E-03	3.98E-02
Chromium	3.31E-03	5.46E-02
Dioxin	2.23E-11	3.68E-10
Hydrogen Chloride	1.00E-01	1.65
Lead	2.82E-03	4.65E-02
Nickel	5.52E-03	9.11E-02
Mercury	5.60E-03	9.24E-02

Total HAPs 1.99
Worst Single HAP 1.65 HCl

Methodology

Limited Potential to Emit (tons/yr) = (Maximum Annual feedstock (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)

Dioxin = Chlorodibenzo-p-dioxin, chlorodibenzofurans total

HCL = Hydrogen Chloride

HCl and Dioxin emissions are controlled by a carbon and lime injected baghouse.

(1) Dioxin emission factors is after control and based on IDEM approved stack test conducted January 14-15, 2010.

(2) HCl emissions limited to less than 10 tons per year to render requirements of 326 IAC 2-7 and 326 IAC 2-4.1 not applicable.

(3) All other HAP emission factors from Fire Version 6.25, dated October 18, 2004, SCC 50300114 (Solid Waste Burned)

**Appendix A: Emission Calculations
 Limited Particulate Emissions
 Baghouse CE-01**

Company Name: Nature's Fuel
Address City IN Zip: 510 E. Main St., Atwood, IN 46502
Permit No.: 085-28516-00115
Reviewer: Brian Williams

Emission Unit/Control Device	Limited PM/PM10/PM2.5 Emissions (lbs/hr)	Limited PM/PM10/PM2.5 Emissions (tons/yr)
Baghouse CE-01 (Raw Material Processing Area, Char Load Out System & Pyrolysis Unit)	19.80	86.74

Methodology

Limited Emissions (tons/yr) = Limited Emissions (lbs/hr) x 1/2000 (ton/lbs) x 8,760 (hrs/yr)

The limited particulate matter emissions from the raw material processing area, char load out system, and pyrolysis unit have been combined into a single limit since they all use Baghouse CE-01 for particulate control and exhaust to stack S1.

**Appendix A: Emissions Calculations
Combustion Box (< 100 mmBtu/hr)
Natural Gas and Producer Gas**

**Company Name: Nature's Fuel
Address City IN Zip: 510 E. Main Street, Atwood, IN 46502
Permit Number: 085-28516-00115
Reviewer: Brian Williams**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
5.0	43.8

Natural Gas	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.04	0.17	0.01	2.19	0.12	1.84

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

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

Producer Gas*	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/hr	0.02	0.02	0.0	0.8	0.02	0.17
Potential Emission in tons/yr	0.09	0.09	0.09	3.68	0.09	0.74

HAPs - Organics	Pollutant				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.599E-05	2.628E-05	1.643E-03	3.942E-02	7.446E-05

HAPs - Metals	Pollutant				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.095E-05	2.409E-05	3.066E-05	8.322E-06	4.599E-05

Natural Gas Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Producer Gas Methodology

Emission factors provided by source

Potential Emission (tons/yr) = Emission Factor (lb/hr) x 8760 hr/yr x 1/2000 (lb/ton)

**Total HAPs
Single HAP**

**4.13E-02
3.94E-02**

* In order to reduce CO and VOC emissions from the pyrolysis unit, the source will route the uncondensed "producer gases" from the pyrolysis unit back to the combustion box. The "producer gas" has a very low heating value, so the source will also have to use natural gas, No. 2 fuel oil, or "bio oil" to provide heat to the pyrolysis unit. Therefore, the potential to emit from fuel combustion has been determined as follows: Worst Case Emissions Per Pollutant from Natural Gas, No. 2 Fuel Oil, or Bio Oil + Producer Gas

**Appendix A: Emissions Calculations
Combustion Box (< 100 mmBtu/hr)
#2 Fuel Oil and Bio Oil**

Company Name: Nature's Fuel
Address, City IN Zip: 510 E. Main Street, Atwood, IN 46502
Permit Number: 085-28516-00115
Reviewer: Brian Williams

No. 2 Fuel Oil

Heat Input Capacity Potential Throughput S = Weight % Sulfur
MMBtu/hr kgals/year 0.5

5.0 312.86

	Pollutant					
Emission Factor in lb/kgal	PM* 2.0	PM10 3.3	SO2 71 (142.0S)	NOx 20.0	VOC 0.20	CO 5.0
Potential Emission in tons/yr	0.31	0.52	11.11	3.13	0.031	0.78

Bio Oil

Potential Throughput S = Weight % Sulfur
kgals/year 0.02

305.65

	Pollutant					
Emission Factor in lb/kgal	PM* 2.0	PM10 3.3	SO2 2.88 (142.0S)	NOx 20.0	VOC 0.34	CO 5.0
Potential Emission in tons/yr	0.31	0.50	0.44	3.06	0.052	0.76

	HAPs - Metals				
Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	8.76E-05	6.57E-05	6.57E-05	6.57E-05	1.97E-04

	HAPs - Metals (continued)			
Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	6.57E-05	1.31E-04	6.57E-05	3.29E-04

Total HAPs **1.07E-03**
Single HAP **3.29E-04**

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu
1 gallon of Bio-Oil has a heating value of 143,300 Btu per MSDS sheet provided by source.
Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu or 0.1433 MM Btu
Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)
*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.
**Sulfur content per MSDS sheet provided by source.
Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads**

Company Name: Nature's Fuel
Address City IN Zip: 510 E. Main Street, Atwood, IN 46502
Permit Number: 085-28516-00115
Reviewer: Brian Williams

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	1.0	6.0	6.0	1.0	6.0	1320	0.250	1.5	547.5
Vehicle (leaving plant) (one-way trip)	1.0	6.0	6.0	1.0	6.0	1320	0.250	1.5	547.5
Total			12.0		12.0			3.0	1095.0

Average Vehicle Weight Per Trip = $\frac{1.0}{6.0}$ tons/trip
 Average Miles Per Trip = $\frac{1.5}{6.0}$ miles/trip

Unmitigated Emission Factor, $E_f = k \cdot [(s/12)^a] \cdot [(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	
where k =	4.9	1.5	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-3 Sand/Gravel Processing Plant Road)
a =	0.7	0.9	= constant (AP-42 Table 13.2.2-2)
W =	1.0	1.0	tons = average vehicle weight (provided by source)
b =	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E \cdot [(365 - P)/365]$

Mitigated Emission Factor, $E_{ext} = \frac{E \cdot [(365 - P)/365]}$
 where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	
Unmitigated Emission Factor, $E_f =$	1.57	0.40	lb/mile
Mitigated Emission Factor, $E_{ext} =$	1.03	0.26	lb/mile
Dust Control Efficiency =	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.43	0.11	0.28	0.07	0.14	0.04
Vehicle (leaving plant) (one-way trip)	0.43	0.11	0.28	0.07	0.14	0.04
Total	0.86	0.22	0.57	0.14	0.28	0.07

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PTE = Potential to Emit



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Glenn Johnson
Nature's Fuel
421 East Cook Road Ste 400
Fort Wayne, IN 46825

DATE: August 12, 2010

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

SUBJECT: Final Decision
FESOP
085-28516-00115

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



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Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

August 12, 2010

TO: Warsaw Community Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Nature's Fuel
Permit Number: 085-28516-00115

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant

DATE: August 12, 2010

RE: Nature's Fuel / 085-28516-00115

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

In order to conserve paper and reduce postage costs, IDEM's Office of Air Quality is now sending many permit decisions on CDs in Adobe PDF format. The enclosed CD contains information regarding the company named above.

This permit is also available on the IDEM website at:
<http://www.in.gov/ai/appfiles/idem-caats/>

If you would like to request a paper copy of the permit document, please contact IDEM's central file room at:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

Please Note: *If you feel you have received this information in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV.*

Enclosures
CD Memo.dot 11/14/08

Mail Code 61-53

IDEM Staff	CDENNY 8/12/2010 Natures Fuel 085-28516-00115 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Glenn Johnson Natures Fuel 421 E Cook Rd Ste 400 Fort Wayne IN 46825 (Source CAATS)										
2		Glenn Johnson COO Natures Fuel 421 E Cook Rd Ste 400 Fort Wayne IN 46825 (RO CAATS)										
3		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
4		Warsaw Community Public Library 310 E Main St Warsaw IN 46580-2882 (Library)										
5		Kosciusko County Board of Commissioners 100 W. Center St, Room 220 Warsaw IN 46580 (Local Official)										
6		Mr. Tim Thomas c/o Boilermakers Local 374 6333 Kennedy Ave. Hammond IN 46333 (Affected Party)										
7		Kosciusko County Health Department 100 W. Center Street, 3rd Floor Warsaw IN 46580-2877 (Health Department)										
8		Kim Ferraro Legal Environmental Aid Foundation 150 Lincolnway, Suite 3002 Valparaiso IN 46383 (Affected Party)										
9		David Archer 412 E High Street Warsaw IN 46580 (Affected Party)										
10		Donna Green 108 N Harrison PO BOX 124 Warsaw IN 46502 (Affected Party)										
11		Lindsay Castro 322 E High Street Atwood IN 46580 (Affected Party)										
12		Meloday & Steve Skees 211 E Main Street Box 81 Warsaw IN 46502 (Affected Party)										
13		Luan and Joel Peckham 325 E Main Street PO Box 102 Warsaw In 46502 (Affected Party)										
14		Mr. Chris Heaton Industrial Safety and Environmental Services, Inc. 30723 Old US 20 Elkhart IN 46514 (Consultant)										
15		Phillip & Sharon Byrer 323 East High Street Atwood Warsaw IN 46580 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Mail Code 61-53

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Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Howard and Mabel POB 42 Atwood IN 46502 (Affected Party)									
2		Norman and Nina Hurt 421 East High Street Atwood Warsaw IN 46580 (Affected Party)									
3		Troy and Betty Swanson 305 South Green Street Atwood Warsaw IN 46580 (Affected Party)									
4		Jan Howard POB 11 Atwood IN 46502 (Affected Party)									
5		Phil and Carol Sparrow 311 East High Street Atwood Warsaw IN 46580 (Affected Party)									
6		Todd Swanson 1535 N 800 W Warsaw IN 46580 (Affected Party)									
7		Ashlee Swanson 1490 N 800 W Warsaw IN 46580 (Affected Party)									
8		Brent and Laura Graham 1603 N 750 W Warsaw IN 46580 (Affected Party)									
9		Patricia Swanson 1505 N 800 W Warsaw IN 46580 (Affected Party)									
10		Roger and Nettie Robinson POB 16 Atwood IN 46502 (Affected Party)									
11		Jo Hollar POB 76 Atwood IN 46502 (Affected Party)									
12		Janice Sloan 1813 N 700 W Warsaw IN 46580 (Affected Party)									
13		Jo Williams 223 Gault Street Atwood IN 46580 (Affected Party)									
14		Rick and Teresa Baney POB 86 Atwood IN 46502 (Affected Party)									
15		Charlie and Julia Wise 310 East High Street Atwood Warsaw IN 46580 (Affected Party)									

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Mail Code 61-53

IDEM Staff	CDENNY 8/12/2010 Natures Fuel 085-28516-00115 (final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Danielle 226 East High Street Atwood Warsaw IN 46580 (Affected Party)										
2		Joe Riggins 202 East High Street Atwood Warsaw IN 46580 (Affected Party)										
3		Mark Johnson 119 East High Street Atwood Warsaw IN 46580 (Affected Party)										
4		Richard Coppes 106 East High Street Atwood Warsaw IN 46580 (Affected Party)										
5		Christopher and Sarah Butz 221 South Wray Street Atwood Warsaw IN 46580 (Affected Party)										
6		David and Karen Long POB 14 Atwood IN 46502 (Affected Party)										
7		M. Kintzel POB 116 Atwood IN 46502 (Affected Party)										
8		Billy Grubbs POB 1 Atwood IN 46502 (Affected Party)										
9		Steve and Melody Skees POB 81 Atwood IN 46502 (Affected Party)										
10		Linda Fribley 7170 W Old Road 30 Atwood IN 46580 (Affected Party)										
11		Addie Swanson 726 West Old Road 30 Atwood IN 46502 (Affected Party)										
12		Rosa Shepard 6568 West Old Road 30 Atwood IN 46502 (Affected Party)										
13		Steve and Penny Thomas 2048 N 650 W Warsaw IN 46580 (Affected Party)										
14		Rob Bennett 2086 N 650 W Warsaw IN 46580 (Affected Party)										
15		Tony Swanson POB 22 Atwood IN 46502 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Mail Code 61-53

IDEM Staff Natures Fuel	CDENNY 8/12/2010 085-28516-00115 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Lisa 7135 W 200 N Warsaw IN 46580 (Affected Party)										
2		Vic Virgil Kosciusko County Area Plan Commission 2379 North Fox Farm Road Warsaw IN 46580 (Affected Party)										
3		Daniel Richard 100 W Center Street Warsaw IN 46580 (Affected Party)										
4		Holly Egoir 204 West Railroad Street Atwood IN 46502 (Affected Party)										
5		Michael Rheinheimer 7135 West 200 North Warsaw IN 46580 (Affected Party)										
6		Kenneth Bell POB 183 Atwood IN 46502 (Affected Party)										
7		Melinda Groeneweg 222 Railroad Street Atwood IN 46580 (Affected Party)										
8		Randy Woodling 2931 North Williamson Drive Warsaw IN 46582 (Affected Party)										
9		Gary & Kathy Hamill 112 South Wray Street Atwood IN 46502 (Affected Party)										
10		Rick & Jo Ellen Jackson 7163 W 200 N Warsaw IN 46580 (Affected Party)										
11		Larry Noble 212 Wilson Street Tipton IN 46072 (Affected Party)										
12		Betty & Troy Swanson 305 S Green St Atwood Warsaw IN 46580 (Affected Party)										
13		Linda Roberts 107 N Wray St Atwood Warsaw IN 46580 (Affected Party)										
14		Melinda Groeweweg 222 W Railroad St Atwood Atwood IN 46580 (Affected Party)										
15		Orcutt Vicki 1458 N 650 W Warsaw IN 46580 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Mail Code 61-53

IDEM Staff	CDENNY 8/12/2010 Natures Fuel 085-28516-00015 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Randy 1304 Bluebird Drive Warsaw IN 46580 (Affected Party)										
2		Mark Mikel 227 East High Street Atwood In 46580 (Affected Party)										
3		Amie Rogers 3762 West Old Rd 30 Lot 54 E Warsaw IN 46580 (Affected Party)										
4		Sheryl McKee 226 East High Street Warsaw IN 46585 (Affected Party)										
5		Jennie Earl 7474 W 100 N Warsaw IN 46580 (Affected Party)										
6		Tammy Edwards 226 East High Street Atwood Warsaw IN 46585 (Affected Party)										
7		Tammy Freeman 227 East high Street Warsaw IN 46580 (Affected Party)										
8		James Moyer 204 S Harrison Street Atwood IN 46502 (Affected Party)										
9		Rhonda Williamson POB 195 319 East Main Street Atwood IN 46502 (Affected Party)										
10		Anita & James Poyser POB 213 205 S Harrison Street Atwood IN 46502 (Affected Party)										
11		Charles Williams POB 34 223 Gault Street Atwood IN 46502 (Affected Party)										
12		Jack Boardmear POB 5 Atwood IN 46580 (Affected Party)										
13		Shawn & Jen Smith 105 N Prairie Street Atwood In 46502 (Affected Party)										
14		Debbie Swanson POB 22 Atwood IN 46502 (Affected Party)										
15		Diana Barnhart 402 East Main Street Atwood IN 46502 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Mail Code 61-53

IDEM Staff	CDENNY 8/12/2010 Natures Fuel 085-28516-00115 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Cheyenne POB 402 East Main Street Atwood IN 46825 (Affected Party)										
2		Wendy Metzger 205 South Wray Street Warsaw, IN 46586 (Affected Party)										
3		Gwen Bell 202 South Wray Street Warsaw IN 46586 (Affected Party)										
4		Tiean Blair 2433 W Grandview Drive Warsaw IN 46586 (Affected Party)										
5		Joe Whitley 7634 West Beachwood Hall Warsaw IN 46586 (Affected Party)										
6		Schottie Whittenberger 106 East High Street Warsaw IN 46586 (Affected Party)										
7		Nichole Martin 310 South Wray Street Warsaw IN 46586 (Affected Party)										
8		Teresa Petger 317 South Wray Street Warsaw In 46586 (Affected Party)										
9		Glenna & Allen Wagner 127 East Gault Street Warsaw IN 46586 (Affected Party)										
10		Maurice McDaniel 523 Gault Street Warsaw IN 46586 (Affected Party)										
11		Neil Huys 313 Gault Street POB 56 Warsaw IN 46586 (Affected Party)										
12		Monica Welch 415 E Gault Street POB 223 Warsaw IN 46586 (Affected Party)										
13		R Taylor 310 E High Street Atwood IN 4680 (Affected Party)										
14		Tammy Freeman 227 E High Street Atwood IN (Affected Party)										
15		Karrah Creamer 221 East High Street Atwood IN (Affected Party)										

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Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Sally 214 East High Street Atwood IN 46586 (Affected Party)										
2		Phillip Shaffer 203 South Wray Street Warsaw IN 46586 (Affected Party)										
3		Aulbrey Sponseller 114 West Railroad Street Atwood IN 46580 (Affected Party)										
4		Lyndsey & Jeremy Evans 111 East High Street Atwood IN (Affected Party)										
5		John & Kathy Cox 200 South Wray Street Atwood IN 46502 (Affected Party)										
6		Jerry & Marilyn Yotter 629 East Gault Street Atwood IN 46502 (Affected Party)										
7		Torie Cleveland 312 old Road 30 West Atwood IN 46502 (Affected Party)										
8		Michael Williams 319 East Main Street Atwood IN 46502 (Affected Party)										
9		Tim Murphy 109 South Jackson Street Warsaw IN 46582 (Affected Party)										
10		Jack Boardman POB 5 Warsaw IN 46580 (Affected Party)										
11		Tina Yoder 108 South Jackson Atwood IN 46502 (Affected Party)										
12		B. Sparks 304 East Main Street Atwood IN 46502 (Affected Party)										
13		Brent Byer 1314 N 650 W Atwood IN 46502 (Affected Party)										
14		Zac & Ruth DeFries 313 East Main Street Atwood IN 46502 (Affected Party)										
15		Ryman Household 1490 N 800 W Warsaw IN 46582 (Affected Party)										

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1		AI 114 North Harrison Atwood IN 46580 (Affected Party)										
2												
3												
4												
5												
6												
7												
8												
9												
10												
11												
12												
13												
14												
15												

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