



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: Aug. 16, 2010

RE: Corn Flour Producers, LLC / 055-29129-00039

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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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Corn Flour Producers, LLC
RR 2, Box 376
Worthington, Indiana 47471**

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

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

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

| | |
|---|--|
| Operation Permit No.: M055-29129-00039 | |
| Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality | Issuance Date: Aug. 16, 2010 Expiration Date: Aug. 16, 2020 |

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary corn flour production facility.

| | |
|------------------------------|---|
| Source Address: | RR 2 Box 376, Worthington, Indiana 47471 |
| General Source Phone Number: | (812) 875-3113 |
| SIC Code: | 2046 |
| County Location: | Greene |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories |

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) grain receiving station (hopper truck), identified as GR1, constructed in 2005, with a maximum capacity of 8,000 bushels (240 tons) of grain per hour, with emissions controlled by a high efficiency cyclone (CYC1), a two-sided enclosure and limited drop height, and exhausting to stack 1. Grain fragments, seed husks, dust and other detritus collected by the cyclone during unloading is conveyed pneumatically into the waste storage hopper (WSH1).
- (b) One (1) grain handling and storage system, consisting of totally enclosed drag and screw-type conveyors, legs, and cleaners, identified as GH1, and four (4) grain storage silos, identified as GS1 through GS4, constructed in 2005, with a maximum capacity of handling 1,000 bushels (30 tons) of grain per hour and storing 33,400 bushels (1,200 tons) of grain, with emissions from handling controlled by a high efficiency cyclone (CYC1) which exhausts to stack 1. Grain fragments, seed husks, dust and other detritus collected by the cyclone during handling is conveyed pneumatically to the waste storage hopper (WSH1). Emissions from the grain storage silos are controlled by bin vents.
- (c) One (1) lime loading vacuum blower, identified as LLVB1, constructed in 2005, with a maximum capacity of 0.2 tons of food grade lime per hour, consisting of a vacuum conveyance system with two filters arranged in series, with emissions from the filters exhausting inside the building.
- (d) One (1) corn particle drying process, constructed in 2005, consisting of two (2) dehydration cyclones, identified as DEHYDC1 and DEHYDC2, for drying the wet-milled corn particles and pneumatically conveying the dried corn particles to the cooling cyclones, with particulate emissions exhausting to stacks 4 and 5. The heat for the corn slurry drying process is supplied by two (2) natural gas-fired dryers, identified as NGDRY1 and NGDRY2, constructed in 2005, with maximum capacities of 9.0 MMBtu/hr and 6.0 MMBtu/hr, respectively.

- (e) Two (2) cooling cyclones for cooling the dried corn particles, identified as COOLC1 and COOLC2, constructed in 2005, with the dried, cooled corn particles from COOLC1 conveyed pneumatically to COOLC2, and the dried, cooled corn particles from COOLC2 are gravity-fed into the sifter, with particulate emissions exhausting to stacks 8 and 9, respectively.
- (f) One (1) coarse particles vacuum blower, identified as CPVB1, constructed in 2005, for conveying coarse corn particles and pericarp from the fully enclosed sifter to the aspirator, consisting of a vacuum conveyance system with two filters arranged in series, with emissions from the filters exhausting inside the building.
- (g) One (1) fully enclosed aspirator for separating pericarp from coarse, dried, cooled corn particles, identified as ASP1, constructed in 2005, with a maximum capacity of 2 tons of pericarp and coarse particles per hour, with the pericarp conveyed to the waste storage hopper (WSH1) via a pneumatic conveyance system with emissions controlled by high efficiency cyclone (CYC1) which exhaust to stack 1, and with the coarse, dried, cooled corn particles conveyed to the enclosed secondary hammermill via gravity.
- (h) One (1) fine particles vacuum blower, identified as FPVB1, constructed in 2005, for conveying fine particles to the two (2) flour storage silos (FSS1 and FSS2) and the two (2) finished product hoppers (FPH1 and FPH2), consisting of a pneumatic conveyance system with filters arranged in series, with emissions from the filters exhausting inside the building.
- (i) Two (2) flour storage silos for storing finished flour, identified as FSS1 and FSS2, constructed in 2005, each with a maximum storage capacity of 83.6 tons, with emissions controlled by bin vent filters, and exhausting outside the building.
- (j) Two (2) finished product hoppers for holding finished flour and packaging finished flour, identified as FPH1 and FPH2, constructed in 2005, FPH1 filling 50 pound bags has a maximum capacity of 8.25 tons per hour, FPH2 filling totes has a maximum capacity of 3.84 tons per hour, with particulate from packaging controlled by a bag filter, and exhausting inside the building.
- (k) One (1) waste storage hopper for holding pericarp prior to shipping to animal feed operations and for loading pericarp onto trucks, identified as WSH1, constructed in 2005, with a maximum storage capacity of 2,400 cubic feet of waste, with a maximum loading capacity of 0.5 tons per hour, with pericarp and grain waste from unloading, handling and aspirator operations conveyed to the waste storage hopper by a pneumatic conveyance system, with emissions from conveyance and loading controlled by high efficiency cyclone (CYC1), and exhausting to stack 1.
- (l) One (1) natural gas-fired boiler, identified as B1, constructed in 2005, with a maximum capacity of 6.28 MMbtu/hr, with emissions exhausting to stack 3.
- (m) Paved roads and parking lots with public access.

Note: The corn grain is cooked in a macerator, which uses heat supplied by the boiler. The cooked corn is conveyed pneumatically to a temporary storage tank and then to the primary hammermill, where the grain is pulverized and milled into wet corn particles, and then conveyed pneumatically to the two (2) dehydration cyclones. The maximum capacity of the entire facility is 4.583 tons of corn flour per hour, based on the maximum capacity of the macerator, whose throughput capacity limits the entire process.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M055-29129-00039, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

B.7 Duty to Provide Information

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (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.

The Permittee shall implement the PMPs.
- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, 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 Permittee shall implement the PMPs.

- (c) 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.
- (d) 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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M055-29129-00039 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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 one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

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

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

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

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

**B.15 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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

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

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

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

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

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (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 by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

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.

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

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

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.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (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 2-6.1-5(a)(2)]

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

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

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

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

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

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.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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.

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

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

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

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

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

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue

MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) grain receiving station (hopper truck), identified as GR1, constructed in 2005, with a maximum capacity of 8,000 bushels (240 tons) of grain per hour, with emissions controlled by a high efficiency cyclone (CYC1), a two-sided enclosure and limited drop height, and exhausting to stack 1. Grain fragments, seed husks, dust and other detritus collected by the cyclone during unloading is conveyed pneumatically into the waste storage hopper (WSH1).
- (b) One (1) grain handling and storage system, consisting of totally enclosed drag and screw-type conveyors, legs, and cleaners, identified as GH1, and four (4) grain storage silos, identified as GS1 through GS4, constructed in 2005, with a maximum capacity of handling 1,000 bushels (30 tons) of grain per hour and storing 33,400 bushels (1,002 tons) of grain, with emissions from handling controlled by a high efficiency cyclone (CYC1) which exhausts to stack 1. Grain fragments, seed husks, dust and other detritus collected by the cyclone during handling is conveyed pneumatically to the waste storage hopper (WSH1). Emissions from the grain storage silos are controlled by bin vents.
- (c) One (1) lime loading vacuum blower, identified as LLVB1, constructed in 2005, with a maximum capacity of 0.2 tons of food grade lime per hour, consisting of a vacuum conveyance system with two filters arranged in series, with emissions from the filters exhausting inside the building.
- (d) One (1) corn particle drying process, to be constructed in 2005, consisting of two (2) dehydration cyclones, identified as DEHYDC1 and DEHYDC2, for drying the wet-milled corn particles and pneumatically conveying the dried corn particles to the cooling cyclones, with particulate emissions exhausting to stacks 4 and 5. The heat for the corn particle drying process is supplied by two (2) natural gas-fired dryers, identified as NGDRY1 and NGDRY2, constructed in 2005, with maximum capacities of 9.0 MMBtu/hour and 6.0 MMBtu/hour, respectively.
- (e) Two (2) cooling cyclones for cooling the dried corn particles, identified as COOLC1 and COOLC2, constructed in 2005, with the dried, cooled corn particles from COOLC1 conveyed pneumatically to COOLC2, and the dried, cooled corn particles from COOLC2 are gravity-fed into the sifter, with particulate emissions exhausting to stacks 8 and 9, respectively.
- (f) One (1) coarse particles vacuum blower, identified as CPVB1, constructed in 2005, for conveying coarse corn particles and pericarp from the fully enclosed sifter to the aspirator, consisting of a vacuum conveyance system with two filters arranged in series, with emissions from the filter exhausting inside the building.
- (g) One (1) fully enclosed aspirator for separating pericarp from coarse, dried, cooled corn particles, identified as ASP1, constructed in 2005, with a maximum capacity of 2 tons of pericarp and coarse particles per hour, with the pericarp conveyed to the waste storage hopper (WSH1) via a pneumatic conveyance system with emissions controlled by a high efficiency cyclone (CYC1), which exhausts to stack 1, and with the coarse, dried, cooled corn particles conveyed to the enclosed secondary hammermill via gravity.
- (h) One (1) fine particles vacuum blower, identified as FPVB1, constructed in 2005, for conveying fine particles to the two (2) flour storage silos (FSS1 and FSS2) and the two (2) finished product hoppers (FPH1 and FPH2), consisting of a vacuum and pressure pneumatic conveyance system with filters arranged in series, with emissions from the filters

| | |
|--|---|
| exhausting inside the building. | |
| (i) | Two (2) flour storage silos for storing finished flour, identified as FSS1 and FSS2, constructed in 2005, each with a maximum storage capacity of 83.6 tons, with emissions controlled by bin vent filters, and exhausting outside the building. |
| (j) | Two (2) finished product hoppers for holding finished flour and packaging finished flour, identified as FPH1 and FPH2, constructed in 2005, FPH1 filling 50 pound bags has a maximum capacity of 8.25 tons per hour, FPH2 filling totes has a maximum capacity of 3.84 tons per hour, with particulate from packaging controlled by a bag filter, and exhausting inside the building. |
| (k) | One (1) waste storage hopper for holding pericarp prior to shipping to animal feed operations and for loading pericarp onto trucks, identified as WSH1, constructed in 2005, with a maximum storage capacity of 2,400 cubic feet of waste, with maximum loading capacity of 0.5 tons per hour, with pericarp and grain waste from unloading, handling and aspirator operations conveyed to the waste storage hopper by a pneumatic conveyance system, with emissions from conveyance and loading controlled by high efficiency cyclone (CYC1), and exhausting to stack 1. |
| (The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.) | |

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

D.1.1 PM, PM10, and PM2.5 Limitations [326 IAC 2-2]

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) and 326 IAC 2-6.1-1 (MSOP))
 The unrestricted potential to emit (PTE) of PM/PM10/PM2.5 emissions from the Grain Processing, Conveying and Packaging Operations are equal to or more than 250 tons per year, and therefore applicable to 326 IAC 2-2. In order for the source to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following PM, PM10, and PM2.5 PSD limits:

| Unit ID | Uncontrolled PTE of PM/PM10/PM2.5 (tons/year) | Control Efficiency for PM PSD Limit (%) | PSD PM Limit (tons/year) | Control Efficiency for PSD PM10/PM2.5 Limit (%) | PSD PM10/PM2.5 Limit (tons/year) |
|--|---|---|--------------------------|---|----------------------------------|
| Corn Particle Drying Process Dehydration Cyclone (DEHYDC1) | 818.43 | 85.00% | 54.56 | 62.78% | 21.99 |
| Corn Particle Drying Process Dehydration Cyclone (DEHYDC2) | 327.37 | 85.00% | 13.06 | 62.78% | 5.21 |
| Cooling Cyclone (COOLC1) | 195.97 | 85.00% | 13.06 | 62.78% | 5.27 |
| Cooling Cyclone (COOLC2) | 9798.69 | 85.00% | 13.06 | 62.78% | 5.27 |

| | | | | | |
|--|---------|--------|---------------|--------|--------------|
| Course Particles Vacuum Blower | 303.35 | 85.00% | 20.22 | 62.78% | 8.15 |
| Fine Particles Vacuum Blower 2 Filters in series (FPVB1) | 1821.58 | 85.00% | 121.44 | 62.78% | 48.94 |
| Flour Storage Silo (FSS1) Bin Filter | 3.23 | 85.00% | 0.22 | 62.78% | 2.75 |
| Flour Storage Silo (FSS2) Bin Filter | 3.23 | 85.00% | 0.22 | 62.78% | 0.09 |
| Finish Product Hopper (FPH1) Bin Filter | 7.51 | 85.00% | 0.50 | 62.78% | 0.20 |
| Finish Product Hopper (FPH1) Bin Filter | 7.50 | 85.00% | 0.50 | 62.78% | 0.20 |
| Total PSD Limit per ton per year = | | | 245.61 | | 98.07 |

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate shall not exceed the rate shown in the following table:

| Emission Unit Description | Emission Unit ID # | Maximum Process Weight (tons/hour) | 326 IAC 6-2-3 Allowable Particulate Emissions (lbs/hour) |
|-----------------------------------|----------------------|------------------------------------|--|
| Grain Receiving Station | GR1 | 240 | 60.5 |
| Grain Handling and Storage System | GH1, GS1 through GS4 | 30.0 | 40.0 |
| Waste Storage Hopper | WSH1 | 0.5 | 2.58 |
| Lime Loading Vacuum Blower | LLVB1 | 0.20 | 1.39 |
| Corn Particle Drying Process | DEHYDC1 | 4.58 | 11.4 |
| Corn Particle Drying Process | DEHYDC2 | 4.58 | 11.4 |
| Cooling Cyclone | COOLC1 | 4.58 | 11.4 |
| Cooling Cyclone | COOLC2 | 6.87 | 14.9 |
| Coarse Particles Vacuum Blower | CPVB1 | 2.29 | 7.14 |
| Fine Particles Vacuum Blower | FPVB1 | 4.58 | 11.4 |
| Finish Product Hopper | FPH1 | 8.25 | 16.9 |
| Finish Product Hopper | FPH2 | 3.84 | 10.1 |

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 = process weight rate in tons per hour

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

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

The cyclones and filters shall be in operation at all times the above listed facilities are in operations in order to comply with this limit.

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

A Preventive Maintenance Plan is required for these facilities and their control device. 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.1.4 Particulate Control

Pursuant to 326 IAC 6-3-2, and in order to comply with D.1.1 and D.1.2, the cyclones and filters for particulate control shall be in operation and control emissions from the emission units identified as DEHYDC1, DEHYDC2, COOLC1, COOLC2, CPVB1, FPVB1, FSS1, FSS2, FPH1, and FPH2 at all times that these facilities are in operation.

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

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the stack exhausts from CYC1, DEHYDC1, DEHYDC2, COOLC1, COOLC2, FSS1, FSS2, FPH1, and FPH2 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operations, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.6 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the baghouses used in conjunction with FPVB1, at least once per day when the finished product loading operations (FPH1 and FPH2), is in operation. When for any one reading, the pressure drop across the baghouses are 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. 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.

D.1.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the vacuum blowers, finished product hoppers and storage silos. For sources capable of redirecting vents, a baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection

- (a) For single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line.
- (c) 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.1.9 Cyclone Inspection

An inspection shall be performed each calendar quarter of all cyclones controlling the grain handling, receiving, drying, cooling and storing operations, when exhausting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.1.10 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.11 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain a daily record of visible emission notations of the baghouse stack exhausts from CYC1, DEHYDC1, DEHYDC2, COOLC1, COOLC2, FSS1, FSS2, FPH1, and FPH2 once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain a daily record of the baghouse pressure drop readings. 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).
- (c) To document the compliance status with conditions D.1.7, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.7.
- (d) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (I) One (1) natural gas-fired boiler, identified as B1, constructed in 2005, with a maximum capacity of 6.28 MMBtu/hr, with emissions exhausting to stack 3.

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

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

D.2.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) the particulate emissions from the 6.28 MMBtu/hour natural gas-fired boiler (B1) shall be limited to 0.6 pounds per MMBtu heat input.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

| | |
|----------------------|----------------------------|
| Company Name: | Corn Flour Producers, LLC |
| Address: | RR 2, Box 376 |
| City: | Worthington, Indiana 47471 |
| Phone #: | (812) 875-3113 |
| MSOP #: | M055-29129-00039 |

I hereby certify that Corn Flour Producers, LLC is :

still in operation.

no longer in operation.

I hereby certify that Corn Flour Producers, LLC is :

in compliance with the requirements of MSOP M055-29129-00039.

not in compliance with the requirements of MSOP M055-29129-00039.

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

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

| |
|-----------------------|
| Noncompliance: |
| |
| |
| |
| |

MALFUNCTION REPORT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

| | |
|----------------------------|--|
| Source Name: | Corn Flour Producers, LLC |
| Source Location: | RR 2 Box 376, Worthington, Indiana 47471 |
| County: | Greene |
| SIC Code: | 2046 |
| Permit Renewal No.: | M055-29129-00039 |
| Permit Reviewer: | Marcia Earl |

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Corn Flour Producers, LLC relating to the operation of a stationary corn flour production facility. On March 31, 2010, Corn Flour Producers, LLC submitted an application to the OAQ requesting to renew its operating permit. Corn Flour Producers, LLC was issued a New Source Construction and Minor Source Operating Permit (MSOP) M055-21006-00039 on August 3, 2005.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) grain receiving station (hopper truck), identified as GR1, constructed in 2005, with a maximum capacity of 8,000 bushels (240 tons) of grain per hour, with emissions controlled by a high efficiency cyclone (CYC1), a two-sided enclosure and limited drop height, and exhausting to stack 1. Grain fragments, seed husks, dust and other detritus collected by the cyclone during unloading is conveyed pneumatically into the waste storage hopper (WSH1)
- (b) One (1) grain handling and storage system, consisting of totally enclosed drag and screw-type conveyors, legs, and cleaners, identified as GH1, and four (4) grain storage silos, identified as GS1 through GS4, constructed in 2005, with a maximum capacity of handling 1,000 bushels (30 tons) of grain per hour and storing 33,400 bushels (1,002 tons) of grain, with emissions from handling controlled by a high efficiency cyclone (CYC1) which exhausts to stack 1. Grain fragments, seed husks, dust and other detritus collected by the cyclone during handling is conveyed pneumatically to the waste storage hopper (WSH1). Emissions from the grain storage silos are controlled by bin vents.
- (c) One (1) lime loading vacuum blower, identified as LLVB1, constructed in 2005, with a maximum capacity of 0.2 tons of food grade lime per hour, consisting of a vacuum conveyance system with two filters arranged in series, with emissions from the filters exhausting inside the building.
- (d) One (1) corn particle drying process, constructed in 2005, consisting of two (2) dehydration cyclones, identified as DEHYDC1 and DEHYDC2, for drying the wet-milled corn particles and pneumatically conveying the dried corn particles to the cooling cyclones, with particulate emissions exhausting to stacks 4 and 5. The heat for the corn particle drying process is supplied by two (2) natural gas-fired dryers, identified as

NGDRY1 and NGDRY2, constructed in 2005, with maximum capacities of 9.0 MMBtu/hour and 6.0 MMBtu/hour, respectively.

- (e) Two (2) cooling cyclones for cooling the dried corn particles, identified as COOLC1 and COOLC2, constructed in 2005, with the dried, cooled corn particles from COOLC1 conveyed pneumatically to COOLC2, and the dried, cooled corn particles from COOLC2 are gravity-fed into the sifter, with particulate emissions exhausting to stacks 8 and 9, respectively.
- (f) One (1) coarse particles vacuum blower, identified as CPVB1, constructed in 2005, for conveying coarse corn particles and pericarp from the fully enclosed sifter to the aspirator, consisting of a vacuum conveyance system with two filters arranged in series, with emissions from the filter exhausting inside the building.
- (g) One (1) fully enclosed aspirator for separating pericarp from coarse, dried, cooled corn particles, identified as ASP1, constructed in 2005, with a maximum capacity of 2 tons of pericarp and coarse particles per hour, with the pericarp conveyed to the waste storage hopper (WSH1) via a pneumatic conveyance system with emissions controlled by a high efficiency cyclone (CYC1), which exhausts to stack 1, and with the coarse, dried, cooled corn particles conveyed to the enclosed secondary hammermill via gravity.
- (h) One (1) fine particles vacuum blower, identified as FPVB1, constructed in 2005, for conveying fine particles to the two (2) flour storage silos (FSS1 and FSS2) and the two (2) finished product hoppers (FPH1 and FPH2), consisting of a vacuum and pressure pneumatic conveyance system with filters arranged in series, with emissions from the filters exhausting inside the building.
- (i) Two (2) flour storage silos for storing finished flour, identified as FSS1 and FSS2, constructed in 2005, each with a maximum storage capacity of 83.6 tons, with emissions controlled by bin vent filters, and exhausting outside the building.
- (j) Two (2) finished product hoppers for holding finished flour and packaging finished flour, identified as FPH1 and FPH2, constructed in 2005, FPH1 filling 50 pound bags has a maximum capacity of 8.25 tons per hour, FPH2 filling totes has a maximum capacity of 3.84 tons per hour, with particulate from packaging controlled by a bag filter, and exhausting inside the building.
- (k) One (1) waste storage hopper for holding pericarp prior to shipping to animal feed operations and for loading pericarp onto trucks, identified as WSH1, constructed in 2005, with a maximum storage capacity of 2,400 cubic feet of waste, with maximum loading capacity of 0.5 tons per hour, with pericarp and grain waste from unloading, handling and aspirator operations conveyed to the waste storage hopper by a pneumatic conveyance system, with emissions from conveyance and loading controlled by high efficiency cyclone (CYC1) , and exhausting to stack 1.
- (l) One (1) natural gas-fired boiler, identified as B1, constructed in 2005, with a maximum capacity of 6.28 MMBtu/hour, with emissions exhausting to stack 3.
- (m) Paved roads, unpaved roads, and parking lots with public access
- (n) Blowdown from any of the following: sight glass, boiler or compressor.

Existing Approvals

The source has been operating under MSOP 055-21006-00039 issued on August 3, 2005, with an expiration date of August 3, 2010, with no amendments or revisions.

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

IDEM has made the following changes to clarify Sections B and C in the permit:

Change No. 1

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."

Change No. 2

IDEM has determined that rather than having a Certification condition and various references throughout the permit as to whether a particular report, notice, or correspondence needs to include a certification, the specific conditions that require an affirmation of truth and completeness shall state so. The certification condition has been removed. All statements to whether a certification, pursuant to the former Section B - Certification, is needed or not have been removed. Section B - Credible Evidence and Section C - Asbestos Abatement Projects still require certification as the underlying rules also required certifications.

Change No. 3

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".

Change No. 4

IDEM has decided to clarify Section B - Preventive Maintenance Plan.

Change No. 5

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.

Change No. 6

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.

Change No. 7

IDEM has revised Section C - Incineration to more closely reflect the two underlying rules.

Change No. 8

IDEM has removed the first paragraph of Section C - Performance Testing as due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures

Change No. 9

IDEM has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required state what methods shall be used.

Change No. 10

IDEM has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that 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.

Change No. 11

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 emission 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.

Change No. 12

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.

Change No. 13

IDEM has decided to allow the Permittee the option of using manufacturer's recommendations for the calibration frequency.

Change No. 14

IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.

Air Pollution Control Justification as an Integral Part of the Process

Pursuant to MSOP 055-21006-00039, issued August 3, 2005 the lime loading vacuum blower filters (LLVB1), dehydration cyclones 1 and 2 (DEHYDC1, DEHYDC2), cooling cyclones 1 and 2 (COOLC1 and COOLC2), coarse particles vacuum blower (CPVB1) filters and the fine particles vacuum blower (FPVB1) filters are considered an integral part of the wet corn milling and corn flour production process:

- (a) The filters on the vacuum blowers are considered integral to the process because the lime loading vacuum blower, coarse particles vacuum blower and fine particles vacuum blower cannot operate without the filters. These three processes pneumatically convey material using vacuum and the filters separate product from air when the product has reached it destination.
- (b) The dehydration cyclones 1 and 2 and cooling cyclones 1 and 2 are considered integral to the process because the dehydration cyclones 1 and 2 and cooling cyclones 1 and 2 perform the essential process functions of drying and cooling the corn particles prior to conveying it to the sifter. The dehydration cyclones remove moisture from the wet-milled

corn particles by providing an efficient, turbulent drying environment with a longer residence time in the heated air, resulting in a dryer product. Similarly, the cooling cyclones remove heat from the dried corn slurry particles by providing longer cooling time. The dehydration cyclones 1 and 2 and cooling cyclones 1 and 2 primary purpose is materials processing and not pollution control these processes produce only valuable product and no waste.

IDEM, OAQ has evaluated the justifications and agreed that the lime loading vacuum blower filters, the coarse particles vacuum blower filters, the fine particles vacuum blower filters, the dehydration cyclones 1 and 2 and the cooling cyclones 1 and 2 shall be considered as an integral part of the wet corn milling and corn flour production processes. Therefore, the permitting level will be determined using the potential to emit after the filters and cyclones.

| |
|--------------------------|
| Enforcement Issue |
|--------------------------|

There are no enforcement actions pending.

| |
|------------------------------|
| Emission Calculations |
|------------------------------|

- (a) See Appendix A, pages 1 through 7 of this document for detailed emission calculations.
- (b) The entire grain processing, conveying and package operations is bottlenecked by the macerator, which has a maximum process rate of 4.583 tons per hour.

| |
|---------------------------------|
| County Attainment Status |
|---------------------------------|

The source is located in Greene County.

| Pollutant | Designation |
|---|---|
| SO ₂ | Better than national standards. |
| CO | Unclassifiable or attainment effective November 15, 1990. |
| O ₃ | Attainment effective December 29, 2005, 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. Greene 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}**
 Greene 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. These rules became effective on 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 PM_{2.5} emissions until 326 IAC 2-2 is revised.

- (c) Other Criteria Pollutants
 Greene County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

Appendix A, pages 1 of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated pollutants is less than 100 tons per year. However, PM/PM₁₀/PM_{2.5} is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

Potential to Emit After Issuance

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

| Process/ Emission Unit | Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) | | | | | | | | |
|--|--|--------------------|-------------------|-----------------|-----------------|------|------|------------|------------------|
| | PM | PM ₁₀ * | PM _{2.5} | SO ₂ | NO _x | VOC | CO | Total HAPs | Worst Single HAP |
| Grain and Lime Handling | 0.10 | 0.03 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | -- |
| Grain Processing, Conveying and Package Operations | 245.61** | 36.84** | 36.84** | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | -- |
| Natural Gas-Fired Boilers and Dryers | 0.18 | 0.71 | 0.71 | 0.06 | 9.32 | 0.51 | 9.32 | 1.77E-01 | 1.68E-01 Hexane |
| Paved Roads | 1.01 | 0.19 | 0.19 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | -- |
| Unpaved Roads | 0.02 | 0.02 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | -- |

| Process/ Emission Unit | Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) | | | | | | | | |
|--|--|--------------|--------------|-----------------|-----------------|-------------|-------------|-----------------|------------------|
| | PM | PM10* | PM2.5 | SO ₂ | NO _x | VOC | CO | Total HAPs | Worst Single HAP |
| Total PTE of Entire Source | 38.15 | 37.80 | 37.79 | 0.06 | 9.32 | 0.51 | 9.32 | 1.77E-01 | |
| Title V Major Source Thresholds | NA | 100 | 100 | 100 | 100 | 100 | 100 | 25 | 10 |
| PSD Major Source Thresholds | 250 | 250 | 250 | 250 | 250 | 250 | 250 | NA | NA |
| negl. = negligible *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". | | | | | | | | | |

** In order to render 326 IAC 2-2 (PSD) not applicable, and maintain the MSOP status, these units are limited to less than 245.61 tons per year PM and less than 36.84 tons per year PM10 and PM2.5

This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standards for Grain Emissions, 40 CFR 60, Subpart DD (60.300 through 60.304) (326 IAC 12), are not included in the permit since the storage capacity of the grain silos are less than 1 million U.S. bushels.
- (b) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (60.40c through 60.48c) (326 IAC 12), are not included in the permit since the boiler (B1) has a maximum design input capacity of less than 10 MMBtu/hr.
- (c) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

Compliance Assurance Monitoring (CAM)

- (e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is 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 - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) and 326 IAC 2-6.1-1 (MSOP))
 The unrestricted potential to emit (PTE) of PM/PM10/PM2.5 emissions from the Grain Processing, Conveying and Packaging Operations are equal to or more than 250 tons per year,

and therefore applicable to 326 IAC 2-2. In order for the source to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following PM, PM10, and PM2.5 PSD limits:

| Unit ID | Uncontrolled PTE of PM/PM10/PM2.5 (tons/year) | Control Efficiency for PM PSD Limit (%) | PSD PM Limit (tons/year) | Control Efficiency for PSD PM10/PM2.5 Limit (%) | PSD PM10/PM2.5 Limit (tons/year) |
|--|---|---|--------------------------|---|----------------------------------|
| Corn Particle Drying Process Dehydration Cyclone (DEHYDC1) | 818.43 | 85.00% | 54.56 | 62.78% | 21.99 |
| Corn Particle Drying Process Dehydration Cyclone (DEHYDC2) | 327.37 | 85.00% | 13.06 | 62.78% | 5.21 |
| Cooling Cyclone (COOLC1) | 195.97 | 85.00% | 13.06 | 62.78% | 5.27 |
| Cooling Cyclone (COOLC2) | 9798.69 | 85.00% | 13.06 | 62.78% | 5.27 |
| Course Particles Vacuum Blower | 303.35 | 85.00% | 20.22 | 62.78% | 8.15 |
| Fine Particles Vacuum Blower 2 Filters in series (FPVB1) | 1821.58 | 85.00% | 121.44 | 62.78% | 48.94 |
| Flour Storage Silo (FSS1) Bin Filter | 3.23 | 85.00% | 0.22 | 62.78% | 2.75 |
| Flour Storage Silo (FSS2) Bin Filter | 3.23 | 85.00% | 0.22 | 62.78% | 0.09 |
| Finish Product Hopper (FPH1) Bin Filter | 7.51 | 85.00% | 0.50 | 62.78% | 0.20 |
| Finish Product Hopper (FPH1) Bin Filter | 7.50 | 85.00% | 0.50 | 62.78% | 0.20 |

Total PSD Limit per ton per year = 245.61 98.07

The cyclones, filters, and bin filters associated with the product/product separation or air/product separation used for pneumatic conveyance which includes the cyclones, bin filters, and blower filters must be in operations at all times as the Grain Processing, Conveying and Packaging Operations are in operation to remain under the 326 IAC 2-2 (PSD limit).

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability and 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.

326 IAC 6.5 PM Limitations Except Lake County

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

| |
|---|
| State Rule Applicability – Individual Facilities |
|---|

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

The potential to emit of any single HAP from the entire facility is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4(a), for a total source maximum operating capacity rating of Q of less than ten (10) MMBtu/hr, the particulate matter shall not exceed 0.6. Therefore, the particulate matter emission from the natural gas-fired boiler (B1) shall not exceed 0.6 pound per MMBtu heat input. For Q greater than or equal to ten (10) MMBtu/hr, the emission limitations are based on the following equation given in 326 IAC 6-2-4

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the

facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

The heat input capacity of the natural gas-fired boiler (B1) is 6.28 MMBtu/hr.

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

Pursuant to 326 IAC 6-3-2, the particulate emissions from the grain processing and handling facilities at this source shall be limited as shown in the following table:

| Emission Unit Description | Emission Unit ID # | Maximum Process Weight Rate (tons/hour) | 326 IAC 6-2-3 Allowable Particulate Emissions (lbs/hour) | Maximum Capacity Emissions for PM (lbs/hr) | Uncontrolled PTE of PM (lbs/hour) | Controlled PTE of PM (lbs/hr) |
|-----------------------------------|--------------------|---|--|--|-----------------------------------|-------------------------------|
| Grain Receiving Station | GR1 | 240 | 60.5 | 0.16 | 8.40 | 0.84 |
| Grain Handling and Storage System | GH1 | 30.0 | 40.0 | 0.28 | 1.83 | 0.05 |
| Corn Particle Drying Process | DEHYDC 1 | 4.58 | 11.4 | 54.96 | 9342.86 | 8.18 |
| Corn Particle Drying Process | DEHYDC 2 | 4.58 | 11.4 | 21.98 | 3737.14 | 3.27 |
| Cooling Cyclone | COOLC1 | 4.58 | 11.4 | 13.16 | 2237.14 | 1.96 |
| Cooling Cyclone | COOLC2 | 6.87 | 14.9 | 13.16 | 2237.14 | 1.96 |
| Coarse Particles Vacuum Blower | CPVB1 | 2.29 | 7.1 | 20.36 | 3462.86 | 3.03 |
| Fine Particles Vacuum Blower | FPVB1 | 4.58 | 11.4 | 122.32 | 41588.57 | 18.20 |
| Flour Storage Silo | FSS1 | 83.6 | | | 73.71 | |
| Flour Storage Silo | FSS2 | | | | 73.71 | |
| Finish Product Hopper | FPH1 | 8.25 | 16.9 | 0.50 | 171.43 | 0.1 |
| Finish Product Hopper | FPH2 | 3.84 | 10.1 | 0.50 | 171.43 | 0.1 |

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:

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

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

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

The cyclones and filters from the corn particle drying process, cooling cyclones, coarse particles vacuum blower, Fine Particles Vacuum Blower, and the Finished Product Hoppers shall be in operation at all times the above listed facilities are in operations in order to comply with this limit.

| |
|---|
| Compliance Determination and Monitoring Requirements |
|---|

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

- (a) The emission units identified as GR1, GH1, DEHYDC1, DEHYDC2, COOLC1, COOLC2, FPVB1, FPH1 and FPH2, have applicable compliance monitoring conditions as specified below.

| Control | Parameter | Frequency | Range | Excursions and Exceedances |
|--|---------------------------|-----------|-------------------|----------------------------|
| DEHYDC1, DEHYDC2, COOLC1, COOLC2, FPVB1, FPH1 and FPH2 | Visible Emissions | Daily | Normal-Abnormal | Response Steps |
| FPVB1, FPH1 and FPH2 | Water Pressure Drop | Daily | 2.0 to 8.0 inches | Response Steps |
| GR1 and GH1 | Cyclone Failure Detection | Quarterly | Normal-Abnormal | Response Steps |
| FPVB1, FPH1 and FPH2 | Bags/Filters | Quarterly | Normal-Abnormal | Response Steps |

These monitoring conditions are necessary because the cyclones and baghouses must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 2-2 (PSD), and 326 IAC 2-6.1 (MSOP).

| |
|-----------------------|
| Recommendation |
|-----------------------|

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

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

An application for the purposes of this review was received on March 31, 2010.

| |
|-------------------|
| Conclusion |
|-------------------|

The operation of this corn flour production shall be subject to the conditions of the attached MSOP Renewal No. **M055-29129-00039**.

| |
|---------------------|
| IDEM Contact |
|---------------------|

- (a) Questions regarding this proposed permit can be directed to Marcia Earl 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) 233-0863 or toll free at 1-800-451-6027 extension 3-0863.
- (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: Emissions Calculations
PM and PM10 Emissions from Grain and Lime Handling**

Company Name: Corn Flour Producers, LLC
Address: RR 2 Box 376, Worthington, Indiana 47471
Permit No.: M055-29129-00039
Reviewer: Marcia Earl
Date: April 2010

| Emissions Unit Description | Unit ID | Maximum Throughput (tons/hour) | PM Emission Factor (lbs/ton) | PM10 Emission Factor (lbs/ton) | PM2.5 Emission Factor (lbs/ton) | Control Device(s) | Collection and Control Efficiency (%) |
|--------------------------------|----------------------|--------------------------------|------------------------------|--------------------------------|---------------------------------|--------------------------------|---------------------------------------|
| Grain Receiving - Hopper Truck | GR1 | 4.58 | 0.035 | 0.0078 | 0.0013 | High Efficiency Cyclone (CYC1) | 90.0% |
| Grain Cleaning/Handling | GH1, GS1 through GS4 | 4.58 | 0.061 | 0.034 | 0.0058 | | 97.5% |
| Pericarp | ASP1 | 2.00 | 0.061 | 0.034 | 0.0058 | | 97.5% |
| Lime Loading* | LLVB1 | 0.167 | 3.14 | 1.10 | 1.10 | 2 integral Filters in series | 99.9% |

| Emissions Unit Description | Unit ID | PTE of PM Before Control (tons/year) | PTE of PM10 Before Control (tons/year) | PTE of PM2.5 Before Control (tons/year) | PTE of PM After Control (tons/year) | PTE of PM10 After Control (tons/year) | PTE of PM2.5 After Control (tons/year) |
|--------------------------------|----------------------|--------------------------------------|--|---|-------------------------------------|---------------------------------------|--|
| Grain Receiving - Hopper Truck | GR1 | 0.70 | 0.16 | 0.03 | 0.07 | 0.02 | 0.02 |
| Grain Cleaning/Handling | GH1, GS1 through GS4 | 1.22 | 0.68 | 0.12 | 0.03 | 0.02 | 7.65E-04 |
| Pericarp | ASP1 | 0.53 | 0.53 | 5.08E-02 | 5.34E-04 | 1.34E-02 | 1.27E-03 |
| Lime Loading* | LLVB1 | 27.51 | 8.02E-01 | 8.02E-01 | 2.29E-03 | 8.02E-04 | 8.02E-04 |
| TOTAL | | 29.97 | 2.18 | 1.00 | 0.10 | 0.05 | 0.02 |

* Lime loading filters are integral to the process, permit level is determined after control.

The entire process is bottlenecked by the macerator, which has a maximum process rate of 4.583 tons of corn flour per hour.

Emission factors for grain are from AP 42, Chapter 9.9, Table 9.9.1-1 "Particulate Emission Factors for Grain Elevators" .

(SCC 3-02-005052, SCC 3-02-005-30) (4/03).

Emission factor for lime is from AP 42, Chapter 11.12, Table 11.12-2 Pneumatic Conveying of Cement Supplement to Storage Silo.

Internal handling of whole corn grain consists of transporting grain from corn dump pit to storage silos and then to measurement hopper (2 legs).

Methodology

PTE of PM/PM10 Before Control (tons/year) = Maximum Throughput (tons/year) x Emission factor (lbs/ton) x 8760 (hours/year) x 1 ton/2,000 lbs

PTE of PM/PM10 After Control (tons/year) = Maximum Throughput (tons/year) x Emission factor (lbs/ton) x 8760 (hours/year) x 1 ton/2,000 lbs

x (1-Control Efficiency (%))

Appendix A: Emission Calculations
PM and PM10 Emissions from Grain Processing, Conveying and Packaging Operations

Company Name: Corn Flour Producers, LLC
Address: RR 2 Box 376, Worthington, Indiana 47471
Permit No.: M055-29129-00039
Reviewer: Marcia Earl
Date: April 2010

| Unit ID | Control Device (Integral to Process) * | Outlet Grain Loading (gr/dscf) | Maximum Air Flow Rate (scfm) | Control Efficiency (%) | Controlled PTE of PM/PM10/PM2.5 (lbs/hour) | Controlled PTE of PM/PM10/PM2.5 (tons/year) | Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hour) | Uncontrolled PTE of PM/PM10/PM2.5 (tons/year) | Control Efficiency (%) for PM PSD Limit | PM PSD Limit (lbs/hr) | PM PSD limit (tons/yr) | Control Efficiency (%) for PM10/PM2.5P SD Limit | PM10/PM2.5 PSD Limit (lbs/hr) | PM10/PM2.5 PSD limit (tons/yr) |
|--------------------------------|--|--------------------------------|------------------------------|------------------------|--|---|--|---|---|-----------------------|------------------------|---|-------------------------------|--------------------------------|
| Corn Particle Drying Process | Dehydration Cyclone (DEHYDC1) | 0.010 | 21,800 | 99.00% | 1.87 | 8.18 | 186.86 | 818.43 | 85.00% | 12.46 | 54.56 | 62.78% | 5.02 | 21.99 |
| Corn Particle Drying Process | Dehydration Cyclone (DEHYDC2) | 0.004 | 21,800 | 99.00% | 0.75 | 3.27 | 74.74 | 327.37 | 85.00% | 4.98 | 21.82 | 62.78% | 1.19 | 5.21 |
| Cooling Cyclone | Cooling Cyclone (COOLC1) | 0.003 | 17,400 | 99.00% | 0.45 | 1.96 | 44.74 | 195.97 | 85.00% | 2.98 | 13.06 | 62.78% | 1.20 | 5.27 |
| Cooling Cyclone | Cooling Cyclone (COOLC2) | 0.003 | 17,400 | 99.00% | 0.45 | 1.96 | 2237.14 | 9798.69 | 85.00% | 2.98 | 13.06 | 62.78% | 1.20 | 5.27 |
| Coarse Particles Vacuum Blower | 2 Filters in series (CPVB1) | 0.202 | 400 | 99.00% | 0.69 | 3.03 | 69.26 | 303.35 | 85.00% | 4.62 | 20.22 | 62.78% | 1.86 | 8.15 |
| Fine Particles Vacuum Blower | 2 Filters in series (FPVB1) | 1.213 | 400 | 99.00% | 4.16 | 18.2 | 415.89 | 1821.58 | 85.00% | 27.73 | 121.44 | 62.78% | 11.17 | 48.94 |
| Flour Storage Silo (FSS1) | Bin Filter | 0.002 | 430 | 99.00% | 0.01 | 3.23E-02 | 0.74 | 3.23 | 85.00% | 0.05 | 0.22 | 62.78% | 0.02 | 2.75 |
| Flour Storage Silo (FSS2) | Bin Filter | 0.002 | 430 | 99.00% | 0.01 | 3.23E-02 | 0.74 | 3.23 | 85.00% | 0.05 | 0.22 | 62.78% | 0.02 | 0.09 |
| Finish Product Hopper (FPH1) | Bin Filter | 0.002 | 1,000 | 99.00% | 0.02 | 7.51E-02 | 1.71 | 7.51 | 85.00% | 0.11 | 0.50 | 62.78% | 0.05 | 0.20 |
| Finish Product Hopper (FPH2) | Bin Filter | 0.002 | 1,000 | 99.00% | 0.017 | 7.5E-02 | 1.71 | 7.51 | 85.00% | 0.11 | 0.50 | 62.78% | 0.05 | 0.20 |
| Total | | | | | | 36.84 | | 13286.87 | | | 245.61 | | | 98.07 |

Assume all PM emissions equal PM10/PM2.5 emissions.

* All blowers, cyclones and filters listed on this page are used for pneumatic conveyance, product/product separation or air/product separation. All are integral to process.

The entire process is bottlenecked by the macerator, which has a maximum process rate of 4.583 tons per hour.

Methodology

Controlled PTE of PM/PM10/PM2.5 (tons/year) = Outlet Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 mins/hour x 1/7000 lbs/gr x 8760 hours/year x 1

Uncontrolled PTE = Controlled PTE/ (1-control efficiency)

Appendix A: Emission Calculations
Combustion Emissions from the Natural Gas-fired Boiler and Dryers

Company Name: Corn Flour Producers, LLC
Address: RR 2 Box 376, Worthington, Indiana 47471
Permit No.: M055-29129-00039
Reviewer: Marcia Earl
Date: April 2010

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

21.28

186.4

| Unit | Heat Input Capacity |
|-------------------------|---------------------|
| Boiler #1 | 6.28 |
| NG Corn Slurry Dryer #1 | 9.00 |
| NG Corn Slurry Dryer #2 | 6.00 |
| TOTAL | 21.28 |

| Emission Factor in lb/MMCF | Pollutant | | | | | | |
|-------------------------------|-----------|-------|--------|------|--------------------|------|------|
| | PM* | PM10* | PM2.5* | SO2 | NOx | VOC | CO |
| | 1.9 | 7.6 | 7.6 | 0.6 | 100 **see below | 5.5 | 84 |
| Potential Emission in tons/yr | 0.18 | 0.71 | 0.71 | 0.06 | 9.32 | 0.51 | 7.83 |

*PM emission factor is filterable PM only. PM10/PM2.5 emission factors are filterable and condensable combined.

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

Appendix A: Emission Calculations
Combustion HAP Emissions from the Natural Gas-fired Boiler and Space Heaters

Company Name: Corn Flour Producers, LLC
Address: RR 2 Box 376, Worthington, Indiana 47471
Permit No.: M055-29129-00039
Reviewer: Marcia Earl
Date: April 2010

Heat Input Capacity
MMBtu/hr

21.28

Potential Throughput
MMCF/yr

186.4

| HAPs - Organics | | | | | |
|-------------------------------|----------|-----------------|--------------|----------|----------|
| | 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 | 1.96E-04 | 1.12E-04 | 6.99E-03 | 1.68E-01 | 3.17E-04 |

| HAPs - Metals | | | | | |
|-------------------------------|----------|----------|----------|-----------|----------|
| | 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 | 4.66E-05 | 1.03E-03 | 1.30E-04 | 3.54E-05 | 1.96E-04 |

TOTAL HAPs 1.77E-01

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

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 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
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

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

Company Name: Corn Flour Producers, LLC
Address City IN Zip: RR 2 Box 376, Worthington, Indiana 47471
Permit Number: M055-29129-00039
Reviewer: Marcia Earl
Date: April 2010

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (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) |
|--------------------------|----------------------------|---|----------------------------------|-----------------------------------|---------------------------------------|--------------------------------------|------------------------------------|-----------------------------------|----------------------------------|
| Hopper Truck | 5.0 | 5.0 | 25.0 | 27.00 | 675.0 | 501.6 | 0.095 | 2.38 | 866.9 |
| Semi Trailers (Shipping) | 5.0 | 5.0 | 25.0 | 27.00 | 19.3 | 501.6 | 0.095 | 2.38 | 866.9 |
| Passenger Vehicle | 25.0 | 25.0 | 625.0 | 1.50 | 26.8 | 501.6 | 0.095 | 59.38 | 21671.9 |
| Total | | | 675.00 | | 721.05 | | | 64.13 | 23405.6 |

Average Vehicle Weight Per Trip =

| | |
|-----|-----------|
| 8.8 | tons/trip |
|-----|-----------|

Average Miles Per Trip =

| | |
|-------|------------|
| 0.095 | miles/trip |
|-------|------------|

Unmitigated Emission Factor, Ef = $[k * (sL/2)^{0.65} * (W/3)^{1.5} - C]$ (Equation 1 from AP-42 13.2.1)

| | PM | PM10 | |
|-----------|---------|---------|--|
| where k = | 0.082 | 0.016 | lb/mi = particle size multiplier (AP-42 Table 13.2.1-1) |
| W = | 8.8 | 8.8 | tons = average vehicle weight (provided by source) |
| C = | 0.00047 | 0.00047 | lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2) |
| sL = | 0.6 | 0.6 | g/m ² = Typical Silt Loading Values of paved roads at municipal solid waste landfill (Table 13.2.1-4) |

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [1 - (p/4N)]$

Mitigated Emission Factor, Eext = $Ef * [1 - (p/4N)]$
where p =

| | |
|-----|---|
| 125 | days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2) |
|-----|---|

N =

| | |
|-----|---------------|
| 365 | days per year |
|-----|---------------|

| | PM | PM10 | |
|-----------------------------------|------|----------|---|
| Unmitigated Emission Factor, Ef = | 0.19 | 3.63E-02 | lb/mile |
| Mitigated Emission Factor, Eext = | 0.17 | 3.32E-02 | 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/PM2.5 (tons/yr) | Mitigated PTE of PM (tons/yr) | Mitigated PTE of PM10/PM2.5 (tons/yr) | Controlled PTE of PM (tons/yr) | Controlled PTE of PM10/PM2.5 (tons/yr) |
|--------------------------|---------------------------------|---|-------------------------------|---------------------------------------|--------------------------------|--|
| Hopper Truck | 0.082 | 0.016 | 0.075 | 0.014 | 0.037 | 0.007 |
| Semi Trailers (Shipping) | 0.082 | 0.016 | 0.075 | 0.014 | 0.037 | 0.007 |
| Passenger Vehicle | 2.041 | 0.393 | 1.866 | 0.359 | 0.933 | 0.180 |
| Total | 2.20 | 0.42 | 2.02 | 0.39 | 1.01 | 0.19 |

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 day (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 day (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

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

Company Name: Corn Flour Producers, LLC
Address City IN Zip: Rural Route 2, Box 376, Worthington, Indiana 47471
Permit Number: M055-29129-00039
Reviewer: Marcia Earl
Date: April 2010

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) |
|--------------|----------------------------|---|----------------------------------|-----------------------------------|---------------------------------------|--------------------------------------|------------------------------------|-----------------------------------|----------------------------------|
| Hopper Truck | 5.0 | 5.0 | 25.0 | 27.0 | 675.0 | 501.6 | 0.095 | 2.4 | 866.9 |
| Total | | | 25.0 | | 675.0 | | | 2.4 | 866.9 |

Average Vehicle Weight Per Trip = $\frac{27.0}{25.0}$ tons/trip
 Average Miles Per Trip = $\frac{0.095}{25.0}$ miles/trip

Unmitigated Emission Factor, $E_f = k \left[\frac{s}{12} \right]^a \left[\frac{W}{3} \right]^b$ (Equation 1a from AP-42 13.2.2)

| | PM | PM10 | |
|-----------|-------|-------|---|
| where k = | 0.082 | 0.016 | lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads) |
| s = | 6.4 | 6.4 | % = 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 = | 27.0 | 27.0 | 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, $E_{ext} = E_f \left[\frac{365 - P}{365} \right]$

Mitigated Emission Factor, $E_{ext} = E_f \left[\frac{365 - P}{365} \right]$
 where P = 120 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

| | PM | PM10 | |
|--|------|------|---|
| Unmitigated Emission Factor, E_f = | 0.14 | 0.10 | lb/mile |
| Mitigated Emission Factor, E_{ext} = | 0.10 | 0.10 | 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/PM2.5 (tons/yr) | Mitigated PTE of PM (tons/yr) | Mitigated PTE of PM10/PM2.5 (tons/yr) | Controlled PTE of PM (tons/yr) | Controlled PTE of PM10/PM2.5 (tons/yr) |
|--------------|---------------------------------|---|-------------------------------|---------------------------------------|--------------------------------|--|
| Hopper Truck | 0.06 | 0.04 | 0.04 | 0.04 | 0.02 | 0.02 |
| | 0.06 | 0.04 | 0.04 | 0.04 | 0.02 | 0.02 |

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

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

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

TO: Louis Rusch
Corn Flour Producers, LLC
7383 N. 100 W.
Worthington IN 47471

DATE: Aug. 16, 2010

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

SUBJECT: Final Decision
MSOP
055-29129-00039

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:
Leonardo Olavarrieta GM Corn Flour Producers, LLC
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



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

Aug. 16, 2010

TO: Worthington Jefferson Twp. Public Library

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

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

Applicant Name: Corn Flour Producers, LLC
Permit Number: 055-29129-00039

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

Mail Code 61-53

| | | | | |
|----------------------------|---|---|---|--|
| IDEM Staff | BMILLER 8/16/2010 Corn Flour Producers, LLC 055-29129-00039 (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 | | Louis Rusch Corn Flour Producers, LLC 7383 N 100 W Worthington IN 47471-6310 (Source CAATS) Via Confirmed Delivery | | | | | | | | | | |
| 2 | | Leonardo Olavarrieta GM Corn Flour Producers, LLC 7383 N 100 W Worthington IN 47471-6310 (RO CAATS) | | | | | | | | | | |
| 3 | | Greene County Health Department 217 East Spring Street #1 Bloomfield IN 47424-1440 (Health Department) | | | | | | | | | | |
| 4 | | Worthington Town Council 20 S Commercial St Worthington IN 47471 (Local Official) | | | | | | | | | | |
| 5 | | Worthington Jefferson Twp 26 N Commercial St Worthington IN 47471-1415 (Library) | | | | | | | | | | |
| 6 | | Bledsoe Resident 411 N. Co. Road 525 E. Sullivan IN 47882 (Affected Party) | | | | | | | | | | |
| 7 | | Greene County Board of Commissioners Court house Square #133 C/O Auditor office Bloomfield IN 47424 (Local Official) | | | | | | | | | | |
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| 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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