



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: November 22, 2010
RE: National Starch LLC / 097-29534-00042
FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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



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Ms. Denise Curtis
National Starch LLC
1515 South Drover Street
Indianapolis, Indiana 46221

November 22, 2010

Re: 097-29534-00042
First Significant Permit Modification to
Part 70 Permit Renewal No. T097-26765-00042

Dear Ms. Curtis:

National Starch LLC was issued Part 70 Operating Permit Renewal No. T097-26765-00042 on April 16, 2010 for a stationary wet corn milling plant which produces feed, gluten meal, germ meal, and heavy steepwater located at 1515 South Drover Street, Indianapolis, Indiana 46221. IDEM, OAQ has reviewed a modification application, submitted by National Starch, LLC on August 5, 2010, relating to the operation of a new blending bin, and the relocation and modification of two existing units, a starch storage silo receiver and a starch cooling and conveying system. In addition, the source asked that emission unit descriptions for two existing units, a feed storage hopper and product transfer hopper be corrected. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire Part 70 Operating Permit Renewal as modified.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Sarah Conner, Ph. D., OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or call at (800) 451-6027, and ask for Sarah Conner, Ph. D. or extension 4-6555, or dial (317) 234-6555.

Sincerely,

Donald F. Robin, P.E., Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit, TSD and TSD Appendix A

DFR/slc

cc: File - Marion County
U.S. EPA, Region V
Marion County Health Department
Compliance and Enforcement Branch



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**Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY**

**National Starch LLC
1515 South Drover Street
Indianapolis, Indiana 46221**

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

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

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

Operating Permit No.: T097-26765-00042	
Issued By:/Original Signed By: Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: April 16, 2010 Expiration Date: April 16, 2015

First Administrative Amendment No. 097-29351-00042, issued July 19, 2010
Second Administrative Amendment No. 097-29768-00042, issued October 18, 2010

First Significant Permit Modification No.: 097-29534-00042	
Issued by:  Donald K. Robin, P.E., Section Chief Permits Branch Office of Air Quality	Issuance Date: November 22, 2010 Expiration Date: April 16, 2015

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary wet corn milling plant which produces feed, gluten meal, germ meal, and heavy steepwater.

Source Address:	1515 South Drover Street, Indianapolis, Indiana 46221
General Source Phone Number:	(317) 656-2325
SIC Code:	2046
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major 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 [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

- (a) One (1) natural gas-fired #1 Starch Flash Dryer, identified as unit 40-4, with a maximum heat input capacity of 30 MMBtu/hr and with a maximum air throughput of 42,200 dscfm, using a wet scrubber for particulate control, constructed in 1965 and modified in 1994, and exhausting to stack 40-4; [326 IAC 6.5-6-25]
- (b) One (1) natural gas-fired #2 Starch Flash Dryer, identified as unit 40-3, with a maximum heat input capacity of 36 MMBtu/hr and with a maximum air throughput of 73,000 dscfm, using a wet scrubber for particulate control, constructed in 1967 and modified in 1994 and 1999, and exhausting to stack 40-3; [326 IAC 6.5-6-25]
- (c) One (1) natural gas-fired #3 Starch Flash Dryer, identified as unit 40-2, with a maximum heat input capacity of 36 MMBtu/hr and with a maximum air throughput of 60,000 dscfm, using a wet scrubber for particulate control, constructed in 1971, and exhausting to stack 40-2; [326 IAC 6.5-6-25]
- (d) One (1) natural gas-fired #4 Starch Flash Dryer, identified as unit 575-1, with a maximum heat input capacity of 43 MMBtu/hr and with a maximum air throughput of 84,100 dscfm, using a wet scrubber for particulate control, constructed in 1977, and exhausting to stack 575-1; [326 IAC 6.5-6-25]
- (e) One (1) natural gas-fired #6 Starch Flash Dryer, identified as unit 575-3, with a maximum heat input capacity of 40 MMBtu/hr and with a maximum throughput of 84,100 dscfm, using a wet scrubber for particulate control, constructed in 1993, and exhausting to stack 575-3; [326 IAC 6.5-1-2]

- (f) One (1) natural gas-fired #1 Spray Dryer, identified as unit 5549-1, with a maximum heat input capacity of 25 MMBtu/hr and with a maximum air throughput of 26,000 dscfm, using a wet scrubber for particulate control, constructed in 1993 and modified in 1998, and exhausting to stack 5549-1; [326 IAC 6.5-1-2]
- (g) One (1) natural gas-fired #2 Spray Dryer, identified as unit 5549-2, with a maximum heat input capacity of 25 MMBtu/hr and with a maximum air throughput of 26,000 dscfm, using a wet scrubber for particulate control, constructed in 1993 and modified in 1998, and exhausting to stack 5549-2; [326 IAC 6.5-1-2]
- (h) One (1) natural gas-fired #5 Starch Flash Dryer, identified as unit 575-2, with a maximum heat input capacity of 38 MMBtu/hr and with a maximum air throughput of 84,200 dscfm, using a wet scrubber for particulate control, constructed in 1979 and replaced in 1995, and exhausting to stack 575-2; [326 IAC 6.5-6-25]
- (i) One (1) natural gas-fired Feed Dryer, identified as unit 5502-1A, with a maximum heat input capacity of 77 MMBtu/hr and with a maximum throughput of 20 tons/hr, using a first effect wash water system for SO₂ control, and the RTO, unit 5502-1D for VOC and particulate control, constructed in 1997, and exhausting to the inlet of unit 5502-1D; [326 IAC 6.5-1-2]
- (j) One (1) natural gas-fired Germ Dryer, identified as unit 5502-1B, with a maximum heat input capacity of 20 MMBtu/hr and with a maximum throughput of 11 tons/hr, using the RTO, unit 5502-1D, for VOC and particulate control, constructed in 1997, and exhausting to the inlet of unit 5502-1D; [326 IAC 6.5-1-2]
- (k) One (1) natural gas-fired Gluten Dryer, identified as unit 5502-1C, with a maximum heat input capacity of 32 MMBtu/hr and with a maximum throughput of 4.21 tons/hr, using the RTO, unit 5502-1D, for VOC and particulate control, constructed in 1997, and exhausting to the inlet of unit 5502-1D; [326 IAC 6.5-1-2]
- (l) One (1) natural gas-fired Regenerative Thermal Oxidizer, identified as unit 5502-1D, with a maximum heat input capacity of 18 MMBtu/hr and, used as a control for particulate and VOC, constructed in 1997, and exhausting to stack 5502-7; [326 IAC 6.5-1-2]
- (m) Spray Agglomerator #3, identified as unit 5549-28, part of the spray agglomeration process, with a maximum heat input capacity of 25.0 MMBtu/hr and with a maximum air throughput of 32,300 dscfm, using a wet scrubber for particulate control, constructed in 2001, and exhausting to stack 5549-28; [326 IAC 6.5-1-2]
- (n) One (1) DSW Bulk Bag Filler, identified as unit 71-9, with a maximum capacity of 11 tons/hr, using a baghouse* for particulate control, constructed in 1995, and exhausting to stack 71-9; [326 IAC 6.5-1-2]
- (o) One (1) Feed Storage Hopper, identified as unit 5552-1, with a maximum air throughput of 2,450 dscfm, using a baghouse* for particulate control, constructed in 1995, and exhausting to stack 5552-1; [326 IAC 6.5-1-2]
- (p) One (1) Product Transfer Hopper, identified as unit 5552-2, with a maximum air throughput of 350 dscfm, using a baghouse* for control, constructed in 1995, and exhausting to stack 5552-2; [326 IAC 6.5-1-2]
- (q) One (1) Truck Loadout, identified as unit 5503-6, with a maximum throughput of 25 tons/hr, using a baghouse for particulate control, constructed in 1999, and exhausting to stack 5502-3; [326 IAC 6.5-1-2]

- (r) One (1) Germ Bin, one (1) Pellet Bin #1, and one (1) Pellet Bin #2, identified as units 5503-2, 5503-3, and 5503-4 respectively, and with a combined maximum throughput of 120 tons/hr, using a Loadout Dust Collection System for particulate control, identified as 5503-5, each constructed in 1997, and exhausting to stack 5503-2; [326 IAC 6.5-1-2]
- (s) One (1) DSW Packing Fugitive Dust Collector, identified as unit 71-7, with a maximum throughput of 0.1 tons/hr, using a baghouse for particulate control, constructed in 1977, and exhausting to stack 71-7; [326 IAC 6.5-1-2]
- (t) One (1) RSP North Packing Line, identified as unit 577-2, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1979 and modified in 2000, and exhausting to stack 577-2; [326 IAC 6.5-1-2]
- (u) One (1) Gluten Receiver, identified as unit 5503-1, with a maximum throughput of 4.21 tons/hr, using a baghouse* for particulate control, constructed in 1997, and exhausting to stack 5503-1; [326 IAC 6.5-1-2]
- (v) One (1) Pellet Cooler and one (1) Germ Cooler, identified as units 5502-5 and 5502-6, with a maximum throughput of 19.36 tons/hr and 4.21 tons/hr respectively, each using a high efficiency cyclone for particulate control, each constructed in 1997, and exhausting to stacks 5502-5 and 5502-6; [326 IAC 6.5-1-2]
- (w) Two (2) Loose Feed Bins, collectively identified as unit 5502-4, each with a maximum throughput of 19.36 tons/hr, using a baghouse for particulate control, constructed in 1997, and exhausting to stack 5502-3; [326 IAC 6.5-1-2]
- (x) One (1) Hammer Mill, identified as unit 5502-3, with a maximum throughput of 19.36 tons/hr, using a baghouse for particulate control, constructed in 1997, and exhausting to stack 5502-3; [326 IAC 6.5-1-2]
- (y) One (1) DSE Bag Slitter, identified as unit 42-10, with a maximum throughput of 10 tons/hr, using a baghouse for particulate control, constructed in 1987, and exhausting to stack 42-10; [326 IAC 6.5-6-25]
- (z) One (1) P-6 Rework Station, identified as unit 54-1, with a maximum throughput of 7.5 tons/hr, using a baghouse for particulate control, constructed in 1987, and exhausting to stack 54-1; [326 IAC 6.5-1-2]
- (aa) One (1) RSP Hopper #4, identified as unit 577-5, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-5; [326 IAC 6.5-1-2]
- (bb) One (1) RSP Hopper #6, identified as unit 577-6, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-6; [326 IAC 6.5-1-2]
- (cc) One (1) RSP Hopper #5, identified as unit 577-7, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-7; [326 IAC 6.5-1-2]
- (dd) One (1) RSP Hopper #1, identified as unit 577-8, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-8; [326 IAC 6.5-1-2]

- (ee) One (1) RSP Hopper #2, identified as unit 577-9, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-9; [326 IAC 6.5-1-2]
- (ff) One (1) RSP Hopper #3, identified as unit 577-10, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-10; [326 IAC 6.5-1-2]
- (gg) One (1) Industrial Packer, identified as unit 71-1, with a maximum air throughput of 5,300 dscfm, using a baghouse for particulate control, constructed in 1994, and exhausting to stack 71-1; [326 IAC 6.5-6-25]
- (hh) Two (2) Spray Dryer Product Receivers, identified as units 5549-3 and 5549-4, each with a maximum air throughput of 1,700 dscfm, each using a baghouse* for particulate control, each constructed in 1993, and exhausting to stacks 5549-3 and 5549-4; [326 IAC 6.5-1-2]
- (ii) One (1) #1 Spray Dryer Storage Hopper #1, identified as unit 5549-7, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 5549-7; [326 IAC 6.5-1-2]
- (jj) One (1) #1 Spray Dryer Storage Hopper #2, identified as unit 5549-8, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 5549-8; [326 IAC 6.5-1-2]
- (kk) One (1) #2 Spray Dryer Storage Hopper #3, identified as unit 5549-9, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 5549-9; [326 IAC 6.5-1-2]
- (ll) One (1) #2 Spray Dryer Storage Hopper #4, identified as unit 5549-10, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 5549-10; [326 IAC 6.5-1-2]
- (mm) One (1) Agglomerator Feed Storage Bin, identified as unit 5549-12, with a maximum air throughput of 1530 dscfm, using a baghouse* for particulate control, constructed in 1995, and exhausting to stack 5549-12; [326 IAC 6.5-1-2]
- (nn) One (1) Agglomerator, identified as unit 5549-13, with a maximum air throughput of 12,500 dscfm, using a baghouse for particulate control, constructed in 1995, and exhausting to stack 5549-13; [326 IAC 6.5-1-2]
- (oo) One (1) Agglomerator Equipment Aspiration, identified as unit 5549-14, with a maximum air throughput of 2,840 dscfm, using a baghouse** for particulate control, constructed in 1995, and exhausting to stack 5549-14; [326 IAC 6.5-1-2]
- (pp) One (1) spray agglomeration process, constructed in 2000, consisting of the following units:
 - (1) Bulk Bag Packer Filter Receiver, identified as unit 5549-17, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, and exhausting to stack 5549-17; [326 IAC 6.5-1-2]
 - (2) Line 1 Middle Packer, identified as unit 5549-18, with a maximum air throughput of 4,600 dscfm, using a baghouse* for particulate control, and exhausting to stack 5549-18; [326 IAC 6.5-1-2]

- (3) Line 1 North Packer, identified as unit 5549-19, with a maximum air throughput of 5,400 dscfm, using a baghouse* for particulate control, and exhausting to stack 5549-19; [326 IAC 6.5-1-2]
 - (4) #2 Fugitive Dust Collector, identified as emission unit 5549-20, with a maximum throughput of 14,000 dscfm, using a baghouse for particulate control, and exhausting to stack 5549-20; [326 IAC 6.5-1-2]
 - (5) Line 1 Packing ambient D/C, identified as unit 5549-21, with a maximum air throughput of 14,000 dscfm, using a baghouse for particulate control, and exhausting to stack 5549-21; [326 IAC 6.5-1-2]
 - (6) Line 2 Packer, identified as unit 5549-26, with a maximum air throughput of 5,400 dscfm, using a baghouse* for particulate control, and exhausting to stack 5549-26; [326 IAC 6.5-1-2]
- (qq) One (1) West Corn Truck Dump, identified as unit 56-1, with a maximum throughput of 448 tons/hr, using a baghouse for particulate control, constructed prior to 1968, and modified in 1996, and exhausting to stack 56-1; [326 IAC 6.5-6-25]
- (rr) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations: [326 IAC 2-7-1(21)(G)(xxiii)]
- (1) One (1) DSE Hopper #9, identified as unit 42-3A, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 6; [326 IAC 6.5-6-25]
 - (2) One (1) DSE Hopper #10, identified as unit 42-3B, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 7; [326 IAC 6.5-6-25]
 - (3) One (1) DSE Hopper #11, identified as unit 42-3C, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 43-3C; [326 IAC 6.5-6-25]
 - (4) One (1) DSE Hopper #12, identified as unit 42-3D, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 9; [326 IAC 6.5-6-25]
 - (5) One (1) DSE Hopper #13, identified as unit 42-3E, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 10; [326 IAC 6.5-6-25]
 - (6) One (1) DSE Hopper #14, identified as unit 42-3F, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 11; [326 IAC 6.5-6-25]
 - (7) One (1) DSE Hopper #2, identified as unit 42-7A, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 14; [326 IAC 6.5-6-25]
 - (8) One (1) DSE Hopper #4, identified as unit 42-7B, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 14; [326 IAC 6.5-6-25]

- (9) One (1) DSE Hopper #6, identified as unit 42-7C, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 16; [326 IAC 6.5-6-25]
- (10) One (1) DSE Hopper #1, identified as unit 42-8A, with a maximum throughput of 10 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 17A; [326 IAC 6.5-6-25]
- (11) One (1) DSE Hopper #3, identified as unit 42-8B, with a maximum throughput of 10 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 17B; [326 IAC 6.5-6-25]
- (12) One (1) DSE Hopper #5, identified as unit 42-8C, with a maximum throughput of 10 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 17C; [326 IAC 6.5-6-25]
- (13) One (1) DSE Hopper #7, identified as unit 42-8D, with a maximum throughput of 10 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 17D; [326 IAC 6.5-6-25]
- (14) One (1) CWS #8 Mill Receiver; identified as unit 63-1A, with a maximum throughput of 1 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and modified in 1976, and exhausting to stack 46; [326 IAC 6.5-1-2]
- (15) One (1) CWS Entoleter Mill; identified as unit 63-17, with a maximum throughput of 0.8 tons/hr, using a baghouse** for particulate control, constructed in 1977, and exhausting to stack 53; [326 IAC 6.5-1-2]
- (ss) One (1) Grain Elevator, identified as unit 56-2, with a maximum throughput of 80 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 24; [326 IAC 6.5-6-25]
- (tt) Starch operations, starch drying, starch handling and starch packaging consisting of the following units:
 - (1) One (1) Filter Receiver, identified as 152-1, with a maximum air throughput of 500 dscfm, using a baghouse* for particulate control, constructed in 2002, and exhausting to stack 152-1; [326 IAC 6.5-1-2]
 - (2) One (1) Mixer baghouse, identified as 152-2, with a maximum air throughput of 20 dscfm, using a baghouse* for particulate control, constructed in 2002, and exhausting to stack 152-2; [326 IAC 6.5-1-2]
 - (3) One (1) Starch Cooler Filter Receiver, identified as 152-3 (Bld 852), with a maximum air throughput of 589 dscfm, using a baghouse* for particulate control, constructed in 2002, and exhausting to stack 152-3; [326 IAC 6.5-1-2]
 - (4) One (1) Starch Mixer 2 Filter/Receiver, identified as 152-4 (Bld 852A), with a maximum air throughput of 600 dscfm, using a baghouse* for particulate control, constructed on in 2002, and exhausting to stack 152-4; [326 IAC 6.5-1-2]
 - (5) One (1) Starch Mixer 2, identified as 152-5 (Bld 852A), with a maximum air throughput of 1000 dscfm, using a baghouse* for particulate control, constructed in 2002, and exhausting to stack 152-5; [326 IAC 6.5-1-2]

- (6) One (1) Starch Storage Hopper, identified as 152-6, with a maximum throughput of 15 tons/hr, using a baghouse** for particulate control, constructed in 2003, and exhausting to stack 152-6; [326 IAC 6.5-1-2]
- (7) One (1) Starch Hopper D/C, identified as 128-3, with a maximum throughput of 12.5 tons/hr, using a baghouse* for particulate control, constructed in 1983 and modified in 2000, and exhausting to stack 128-3; [326 IAC 6.5-1-2]
- (8) One (1) DSW Chemical Blender Bag Slitter, identified as unit 61-15, with a maximum throughput of 7.5 tons/hr, using a baghouse** for particulate control, constructed prior to 1974, and exhausting to stack 35; [326 IAC 6.5-1-2]
- (9) One (1) DSE Hopper #8, identified as unit 42-4, with a maximum throughput of 13.95 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 17E; [326 IAC 6.5-6-25]
- (10) One (1) Dextrin #1 System Cooler Conveyor, identified as unit 61-3, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1973, and exhausting to stack 27; [326 IAC 6.5-1-2]
- (11) One (1) Dextrin Flash Dryer, identified as unit 61-9, with a maximum throughput of 5 tons/hr, using a cyclone and a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 30; [326 IAC 6.5-6-25]
- (12) One (1) Dextrin #3 System Cooler, identified as unit 61-22, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 41; [326 IAC 6.5-1-2]
- (13) One (1) Dextrin #2 System Cooler Conveyor, identified as unit 61-23, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 42; [326 IAC 6.5-1-2]
- (14) One (1) CWS South Conveying, identified as unit 63-4, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 48; [326 IAC 6.5-1-2]
- (15) One (1) CWS North Conveying, identified as unit 63-5, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 49; [326 IAC 6.5-1-2]
- (16) One (1) DSE North Packer, identified as unit 42-1, with a maximum throughput of 30 tons/hr, using a baghouse* for particulate control, constructed prior to 1968 and modified in 1996, and exhausting to stack 5; [326 IAC 6.5-6-25]
- (17) One (1) DSE South Packer, identified as unit 42-9, with a maximum throughput of 30 tons/hr, using a baghouse* for particulate control, constructed prior to 1968 and modified in 1996, and exhausting to stack 18; [326 IAC 6.5-1-2]
- (18) One (1) sodium sulfate conveying system, identified as unit 40-1, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 1; [326 IAC 6.5-1-2]
- (19) One (1) DSE Negative Receiver, identified as unit 42-6, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 13; [326 IAC 6.5-6-25]

- (20) One (1) DSE Railcar Loading - East Track, identified as unit 42-11, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 20; [326 IAC 6.5-1-2]
- (21) One (1) DSE Railcar Loading - West Track, identified as unit 42-12, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 21; [326 IAC 6.5-1-2]
- (22) One (1) Dextrin #1 System Mixer, identified as unit 61-1, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1973, and exhausting to stack 25; [326 IAC 6.5-1-2]
- (23) One (1) Dextrin #1 System Cookers, identified as unit 61-2, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1973, and exhausting to stack 26; [326 IAC 6.5-1-2]
- (24) One (1) Dextrin #2 System Mixer, identified as unit 61-6, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1974, and exhausting to stack 28; [326 IAC 6.5-6-25]
- (25) Two (2) Dextrin #2 System East and West Tanks, identified as unit 61-7, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1974, and exhausting to stack 29; [326 IAC 6.5-1-2]
- (26) One (1) Starch Storage Silo #3 Receiver, identified as unit 61-11, with a maximum throughput of 7.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 31; [326 IAC 6.5-1-2]
- (27) One (1) Starch Storage Silo #1 Receiver, identified as unit 61-12, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 32; [326 IAC 6.5-1-2]
- (28) One (1) Starch Storage Silo #1, identified as unit 61-13, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 33; [326 IAC 6.5-1-2]
- (29) One (1) Dextrin #1 System Packer, identified as unit 61-14, with a maximum throughput of 7.5 tons/hr, using hopper/filter receiver using a baghouse** for particulate control, constructed prior to 1973, and exhausting to stack 61-14; [326 IAC 6.5-6-25]
- (30) One (1) DSW Chemical Blender Tank; identified as unit 61-14A, with a maximum throughput of 7.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 34; [326 IAC 6.5-6-25]
- (31) One (1) Dextrin System Acidifiers; identified as unit 61-16, with a maximum air throughput of 1,530 dscfm, using a baghouse* for particulate control, constructed in 1973, and exhausting to stack 36; [326 IAC 6.5-1-2]
- (32) One (1) Dextrin #2 System Cooler; identified as unit 61-18, with a maximum air throughput of 2,300 dscfm, using a baghouse* for particulate control, constructed in 1974, and exhausting to stack 37; [326 IAC 6.5-1-2]
- (33) One (1) Dextrin #3 System Cookers; identified as unit 61-19, with a maximum air throughput of 2,300 dscfm, using a baghouse* for particulate control, constructed in 1974, and exhausting to stack 38; [326 IAC 6.5-1-2]

- (34) One (1) Starch Storage Silo #2; identified as unit 61-20, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 39; [326 IAC 6.5-1-2]
- (35) One (1) Starch Storage Silo #2 Receiver; identified as Bin TF41820 (formerly unit 61-21), with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed in 1976, modified in 1981, approved in 2010 for additional modification, and exhausting to stack TF41820; [326 IAC 6.5-1-2]
- (36) One (1) Dextrin #3 System Mixer; identified as unit 61-24, with a maximum air throughput of 410 dscfm, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 43; [326 IAC 6.5-1-2]
- (37) One (1) Dextrin #3 System West Tank; identified as unit 61-25, with a maximum air throughput of 350 dscfm, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 44; [326 IAC 6.5-1-2]
- (38) One (1) Dextrin #3 System East Tank; identified as unit 61-26, with a maximum air throughput of 350 dscfm, using a baghouse** for particulate control, constructed in 1976, and exhausting to stack 45; [326 IAC 6.5-1-2]
- (39) One (1) CWS #7 Dryer Receiver; identified as unit 63-3, with a maximum air throughput of 2000 dscfm, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 47; [326 IAC 6.5-1-2]
- (40) One (1) CWS Packer; identified as unit 63-9, with a maximum throughput of 20 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 50; [326 IAC 6.5-1-2]
- (41) One (1) Liquid Glue Bag Dump; identified as unit 63-12, with a maximum throughput of 8 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 51; [326 IAC 6.5-1-2]
- (42) One (1) CWS #9 and #10 Dryers Receiver; identified as unit 63-15, with a maximum air throughput of 3,600 dscfm, using a baghouse* for particulate control, constructed in 1975 and modified in 2010, and exhausting to stack 52; [326 IAC 6.5-1-2]
- (43) One (1) CWS #11, #12, and #13 Dryers; identified as unit 63-16, with a maximum air throughput of 3,300 dscfm, using a baghouse* for particulate control, constructed in 1977, and exhausting to stack 54; [326 IAC 6.5-1-2]
- (44) One (1) CWS South Raw Material Dump; identified as unit 63-18, with a maximum throughput of 3.5 tons/hr, using a baghouse** for particulate control, constructed in 1977, and exhausting to stack 55; [326 IAC 6.5-1-2]
- (45) One (1) DSW Negative Receiver; identified as unit 63-20, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 56; [326 IAC 6.5-1-2]
- (46) Two (2) DSW Hoppers #17 and #18; identified as unit 71-2, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 58; [326 IAC 6.5-6-25]
- (47) One (1) Dextrin Packer; identified as unit 71-3, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 71-3; [326 IAC 6.5-1-2]

- (48) One (1) DSW Hopper #13, identified as unit 71-4A, with a maximum throughput of 2.5 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 67; [326 IAC 6.5-6-25]
- (49) One (1) DSW Hopper #1; identified as unit 71-5A, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 59; [326 IAC 6.5-6-25]
- (50) One (1) DSW Hopper #2; identified as unit 71-5B, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 60; [326 IAC 6.5-6-25]
- (51) One (1) DSW Hopper #3; identified as unit 71-5C, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 61; [326 IAC 6.5-6-25]
- (52) One (1) DSW Hopper #4; identified as unit 71-5D, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 62; [326 IAC 6.5-6-25]
- (53) One (1) DSW Hopper #5; identified as unit 71-5E, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 63; [326 IAC 6.5-6-25]
- (54) One (1) DSW Hopper #6; identified as unit 71-5F, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 64; [326 IAC 6.5-6-25]
- (55) One (1) DSW Hopper #7; identified as unit 71-5G, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 65; [326 IAC 6.5-6-25]
- (56) One (1) DSW Hopper #8; identified as unit 71-5H, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 66; [326 IAC 6.5-6-25]
- (57) One (1) DSW Hopper #9; identified as unit 71-5I, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 71-5I; [326 IAC 6.5-6-25]
- (58) One (1) DSW Hopper #10; identified as unit 71-5J, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 8; [326 IAC 6.5-6-25]
- (59) One (1) DSW Hopper #11; identified as unit 71-5K, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 69; [326 IAC 6.5-6-25]
- (60) One (1) DSW Hopper #12; identified as unit 71-5L, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 70; [326 IAC 6.5-6-25]
- (61) One (1) DSW Bulk Car Loading; identified as unit 71-8, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed in 1971, and exhausting to stack 72; [326 IAC 6.5-1-2]

- (62) One (1) RSP Bulk Bag Packing; identified as unit 577-1, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 77; [326 IAC 6.5-1-2]
- (63) One (1) RSP Bulk Loading System A; identified as unit 577-4, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 80; [326 IAC 6.5-1-2]
- (64) One (1) RSP Bulk Loading Fugitive Dust Collector**; identified as unit 577-4A, with a maximum throughput of 18 tons/hr and an actual throughput of 18 lbs/hr, constructed in 1986, and exhausting to stack 81; [326 IAC 6.5-1-2]
- (65) One (1) CWS Packing Hopper; identified as unit 578-2, with a maximum throughput of 1 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 89; [326 IAC 6.5-1-2]
- (66) One (1) CWS Milling System, identified as unit 578-3, with a maximum throughput of 1.5 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 90; [326 IAC 6.5-1-2]
- (67) One (1) Starch Cooling and Conveying System, identified as TF41818 (formerly unit 581-2), with a maximum air throughput of 14,000 dscfm, using a baghouse* for particulate control, constructed in 1983, approved in 2010 for modification, and exhausting to stack TF41818; [326 IAC 6.5-1-2]
- (68) One (1) RSP South Packing Line, identified as unit 577-3, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 79; [326 IAC 6.5-1-2]
- (69) One (1) Starch Filter/Receiver 2 Bld 852, identified as unit 152-7, with a maximum air throughput of 500 dscfm, using a baghouse** for particulate control, constructed in 2004, and exhausting to stack 152-7; [326 IAC 6.5-1-2]
- (70) One (1) Starch Mixer 4 Bld 852A Filter Receiver, identified as unit 152-8, with a maximum air throughput of 600 dscfm, using a baghouse** for particulate control, constructed in 2004, and exhausting to stack 157-8; [326 IAC 6.5-1-2]
- (71) One (1) Starch Mixer 4 Bld 852A, identified as unit 152-9, with a maximum air throughput of 20 dscfm, using a baghouse** for particulate control, constructed in 2004, and exhausting to stack 152-9; [326 IAC 6.5-1-2]
- (72) One (1) Starch Mixer 3 Bld 852A Filter Receiver, identified as unit 152-10, with a maximum air 600 dscfm, using a baghouse** for particulate control, constructed in 2004, and exhausting to stack 152-10; [326 IAC 6.5-1-2]
- (73) One (1) Starch Mixer 3 Bld 852A, identified as unit 152-11, with a maximum air throughput of 20 dscfm, using a baghouse** for particulate control, constructed in 2004, and exhausting to stack 152-11; [326 IAC 6.5-1-2]
- (74) One (1) FG Bulk Bag Bin Vent Bld 800, identified as unit FA-60582, with a maximum throughput of 18 tons/hr using a baghouse** for particulate control, constructed in 2003, and exhausting to stack FA-60582; [326 IAC 6.5-1-2]

- (75) One (1) Blending Bin, identified as unit TF31901, with a maximum air throughput of 2,000 dscfm, using product recovery DC-31901** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 1-158; [326 IAC 6.5-1-2]
- (76) One (1) Base Bin, identified as unit TF31902, with a maximum air throughput of 200 dscfm, using product recovery DC-31901** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 2-158; [326 IAC 6.5-1-2]
- (77) One (1) Product Bin, identified as unit TF31991, with a maximum air throughput of 200 dscfm, using product recovery DC-31991** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 3-158; [326 IAC 6.5-1-2]
- (78) One (1) Surge Tank Bin, identified as unit SH31913, with a maximum air throughput of 200 dscfm, using product recovery DC-31911** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 7-158; [326 IAC 6.5-1-2]
- (79) One (1) Bulk Bag Unload Bin, identified as unit DC-31900 (Bld 630) with a maximum air throughput of 600 dscfm, using a dust collector* for particulate control, constructed in 2004, and exhausting to stack 8-158; [326 IAC 6.5-1-2]
- (80) One (1) FBR exhaust, identified as unit TR31912, with a maximum air throughput of 8,800 dscfm, using product recovery metal filters** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 5-158 [326 IAC 6.5-1-2]
- (81) One (1) starch dryer, identified as unit T-1, with a maximum production rate of 300 lbs/hr, using a product collector/cyclone and dust collector* for particulate control, constructed in 2005, and exhausting to stack T-1; [326 IAC 6.5-1-2]
- (82) One (1) Line 1 South Packing Hopper, identified as unit 5549-22, with a maximum air throughput of 4,800 dscfm, using a baghouse* for particulate control, constructed in 2006, and exhausting to stack 5549-22. [326 IAC 6.5-1-2]
- (83) One (1) CSW conveying cyclone operation, identified as unit 578-1, with a maximum throughput of 7.5 tons/hr, using a baghouse** for particulate control, returned to service in 2008, and exhausting through stack 578-1. [326 IAC 6.5-1-2]
- (84) One (1) Blending Bin, identified as TF41819, with a maximum air throughput of 4,000 dscfm, using a baghouse* for particulate control, approved in 2010 for construction, and exhausting to stack DC41819 [326 IAC 6.5-1-2]

*The control device is considered both integral to the process and inherent to the process for CAM applicability. Inherent process equipment is not subject to Compliance Assurance Monitoring (CAM). See TSD pages 15 through 19 for additional information.

**The control device is considered inherent to the process for CAM applicability. Inherent process equipment is not subject to Compliance Assurance Monitoring (CAM). See TSD pages 19 through 25 for additional information.

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

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

- (a) Combustion related activities including spaces heaters, process heaters, or boilers using natural gas-fired with heat input equal to or less than ten million (10,000,000) British thermal units per hour;

- (1) One (1) process heater, Bld 630, natural gas fired, with maximum heat input capacity of 5.1 MMBtu/hr, identified as emission unit YX31914A, constructed in 2004 and venting out stack 158-6. [326 IAC 6-2-4]
- (b) Cleaners and solvents, from operations M1 through M4 and RSP shop, characterized as:
 - (1) having a vapor pressure equal to or less than two (2.0) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pound per square inch) measured at thirty-eight (38) degrees Centigrade (one hundred (100) degrees Fahrenheit); or
 - (2) having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit);the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

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

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T097-26765-00042, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

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

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

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

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

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

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

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
- (i) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and
 - (ii) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

(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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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. The

PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

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

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

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

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

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

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

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

- (a) All terms and conditions of permits established prior to T097-26765-00042 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

**B.18 Permit Revision Under Economic Incentives and Other Programs
[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]**

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

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

(3) Any change in emissions; and

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 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 thirty percent (30%) 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.2 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.3 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.4 Fugitive Dust Emissions [326 IAC 6-4]

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

C.5 Stack Height [326 IAC 1-7]

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

C.7 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.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]
Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
[326 IAC 2-2][326 IAC 2-3]

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

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

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]
[326 IAC 2-2][326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) 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.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and

- (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part 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

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

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) natural gas-fired #1 Starch Flash Dryer, identified as unit 40-4, with a maximum heat input capacity of 30 MMBtu/hr and with a maximum air throughput of 42,200 dscfm, using a wet scrubber for particulate control, constructed in 1965 and modified in 1994, and exhausting to stack 40-4; [326 IAC 6.5-6-25]
- (b) One (1) natural gas-fired #2 Starch Flash Dryer, identified as unit 40-3, with a maximum heat input capacity of 36 MMBtu/hr and with a maximum air throughput of 73,000 dscfm, using a wet scrubber for particulate control, constructed in 1967 and modified in 1994 and 1999, and exhausting to stack 40-3; [326 IAC 6.5-6-25]
- (c) One (1) natural gas-fired #3 Starch Flash Dryer, identified as unit 40-2, with a maximum heat input capacity of 36 MMBtu/hr and with a maximum air throughput of 60,000 dscfm, using a wet scrubber for particulate control, constructed in 1971, and exhausting to stack 40-2; [326 IAC 6.5-6-25]
- (d) One (1) natural gas-fired #4 Starch Flash Dryer, identified as unit 575-1, with a maximum heat input capacity of 43 MMBtu/hr and with a maximum air throughput of 84,100 dscfm, using a wet scrubber for particulate control, constructed in 1977, and exhausting to stack 575-1; [326 IAC 6.5-6-25]
- (e) One (1) natural gas-fired #6 Starch Flash Dryer, identified as unit 575-3, with a maximum heat input capacity of 40 MMBtu/hr and with a maximum throughput of 84,100 dscfm, using a wet scrubber for particulate control, constructed in 1993, and exhausting to stack 575-3; [326 IAC 6.5-1-2]
- (f) One (1) natural gas-fired #1 Spray Dryer, identified as unit 5549-1, with a maximum heat input capacity of 25 MMBtu/hr and with a maximum air throughput of 26,000 dscfm, using a wet scrubber for particulate control, constructed in 1993 and modified in 1998, and exhausting to stack 5549-1; [326 IAC 6.5-1-2]
- (g) One (1) natural gas-fired #2 Spray Dryer, identified as unit 5549-2, with a maximum heat input capacity of 25 MMBtu/hr and with a maximum air throughput of 26,000 dscfm, using a wet scrubber for particulate control, constructed in 1993 and modified in 1998, and exhausting to stack 5549-2; [326 IAC 6.5-1-2]
- (h) One (1) natural gas-fired #5 Starch Flash Dryer, identified as unit 575-2, with a maximum heat input capacity of 38 MMBtu/hr and with a maximum air throughput of 84,200 dscfm, using a wet scrubber for particulate control, constructed in 1979 and replaced in 1995, and exhausting to stack 575-2; [326 IAC 6.5-6-25]
- (i) One (1) natural gas-fired Feed Dryer, identified as unit 5502-1A, with a maximum heat input capacity of 77 MMBtu/hr and with a maximum throughput of 20 tons/hr, using a first effect wash water system for SO₂ control, and the RTO, unit 5502-1D for VOC and particulate control, constructed in 1997, and exhausting to the inlet of unit 5502-1D; [326 IAC 6.5-1-2]
- (j) One (1) natural gas-fired Germ Dryer, identified as unit 5502-1B, with a maximum heat input capacity of 20 MMBtu/hr and with a maximum throughput of 11 tons/hr, using the RTO, unit 5502-1D, for VOC and particulate control, constructed in 1997, and exhausting to the inlet of unit 5502-1D; [326 IAC 6.5-1-2]

- (k) One (1) natural gas-fired Gluten Dryer, identified as unit 5502-1C, with a maximum heat input capacity of 32 MMBtu/hr and with a maximum throughput of 4.21 tons/hr, using the RTO ,unit 5502-1D, for VOC and particulate control, constructed in 1997, and exhausting to the inlet of unit 5502-1D; [326 IAC 6.5-1-2]
- (l) One (1) natural gas-fired Regenerative Thermal Oxidizer, identified as unit 5502-1D, with a maximum heat input capacity of 18 MMBtu/hr and, used as a control for particulate and VOC, constructed in 1997, and exhausting to stack 5502-7; [326 IAC 6.5-1-2]
- (m) Spray Agglomerator #3, identified as unit 5549-28, part of the spray agglomeration process, with a maximum heat input capacity of 25.0 MMBtu/hr and with a maximum air throughput of 32,300 dscfm, using a wet scrubber for particulate control, constructed in 2001, and exhausting to stack 5549-28; [326 IAC 6.5-1-2]

(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 2-7-5(1)]

D.1.1 Prevention of Significant Deterioration [326 IAC 2-2]

- (a) Pursuant to CP 097-00042-97-01, issued March 24, 1997, A 097-00042-98-01, issued April 15, 1998, and in order to render the requirements of 326 IAC 2-2 not applicable:
 - (1) The combined input of corn grind to units 5502-1A, 5502-1B, 5502-1C, 5502-3 (Section D.2), 5502-4 (Section D.2), 5502-5 (Section D.2), 5502-6 (Section D.2), 5503-1 (Section D.2), 5503-2 (Section D.2), 5503-3 (Section D.2), 5503-4 (Section D.2), 5503-5 (Section D.2) and 5503-6 (Section D.2) shall not exceed 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit and the limits set in D.1.1(c) and D.2.1(a) limits PM/PM10 emissions to less than or equal to 43.862 tons per year and will render the requirements of 326 IAC 2-2 not applicable.
 - (2) The combined input of starch for units 5549-1 and 5549-2 shall not exceed 22,500 tons per twelve consecutive month period with compliance determined at the end of each month and the total emission rate shall not exceed 2.50 lb PM/PM10 per ton of starch. Compliance with this limit will limit PM/PM10 emissions to less than or equal to 28.11 tons per year and will render the requirements of 326 IAC 2-2 not applicable.
 - (3) The SO₂ emissions from units 5502-1A, 5502-1B, 5502-1C, and 5502-1D, shall not exceed a total of 8.05 pounds per hour. Compliance with this limit will limit SO₂ emissions to less than or equal to 35.26 tons per year and will render the requirements of 326 IAC 2-2 not applicable.
 - (4) The combined input of natural gas to 5502-1A, 5502-1B, 5502-1C, and 5502-1D shall not exceed 1,780 million cubic feet (MMcf) per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit will limit NO_x emissions to less than or equal to 39 tons per year and will render the requirements of 326 IAC 2-2 not applicable.
- (b) Pursuant to CP 097-00042-97-01, issued March 24, 1997, SSM 097-11362-00042, issued August 31, 1996, and in order to render the requirements of 326 IAC 2-2 not applicable, the following facilities are limited as indicated in the table below:

Unit/ Stack ID	PM/PM10 Limit (gr/dscf)	PM/PM10 Limit (lb/hr)	PM/PM10 Limit (ton/yr)
575-3	0.012	5.63	24.65
5549-1	0.02	--	--
5549-2	0.02	--	--
5549-28	0.025	9.64	42.24

- (c) Pursuant to M 097-00042-99-01, issued February 25, 1999, the total PM/PM10 emissions from stack 5502-7 (exhausting emissions from units 5502-1A through 5502-1D) shall not exceed 0.0114 gr/dscf, 4.53 lb/hr, and 19.856 tons per year. Compliance with this limit will render the requirements of 326 IAC 2-2 not applicable.
- (d) Pursuant to CP 097-00042-99-01, issued June 11, 1999, the starch produced from unit 40-3 shall not exceed 145,610 tons per twelve consecutive month period with compliance determined at the end of each month and the emission rate shall not exceed 0.581 lb of PM/PM10 per ton of starch produced. Compliance with this limit will limit PM/PM10 emissions to less than or equal to 42.3 tons per year, will satisfy the requirements of 326 IAC 6.5-6-25, and render the requirements of 326 IAC 2-2 not applicable.
- (e) The combined VOC emissions from units 5502-1A, 5502-1B, 5502-1C, and 5502-1D shall not exceed a total of 4.89 pounds per hour. Compliance with this limit will limit VOC emissions to less than or equal to 21.4 tons of per year and will render the requirements of 326 IAC 2-2 not applicable to the Germ Dryer, Feed Dryer, and Gluten Dryer.

D.1.2 Particulate Matter [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, the particulate matter emissions from units 575-3, 5502-1A, 5502-1B, 5502-1C, 5502-1D, 5549-1, 5549-2, and 5549-28 shall each not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

D.1.3 Particulate Matter [326 IAC 6.5-6-25]

- (a) Facilities 40-4, 40-3, 40-2, 575-1, and 575-2 are limited as indicated in the table below:

Facility	PM Limit (gr/dscf)	PM Limit (ton/yr)
40-4	0.02	44.1
40-3	0.016	42.3
40-2	0.016	31.9
575-1	0.011	32.4
575-2	0.011	32.4

Compliance with these limits will satisfy the requirements of 326 IAC 6.5-6-25.

- (b) Pursuant to CP 097-00042-95-02, issued March 8, 1995, the amount of dry product processed by unit 575-2 shall not exceed 123,300 tons per twelve month consecutive period with compliance determined at the end of each month. Compliance with this limit will satisfy the requirements of 326 IAC 6.5-6-25.

D.1.4 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the Permittee shall employ Best Available Control Technology (BACT) for emission units 5502-1A, 5502-1B, 5502-1C which has been determined to be:

- (a) The VOC emissions from the Germ Dryer, Feed Dryer, and Gluten Dryer, identified as 5502-1A, 5502-1B, and 5502-1C, shall be controlled by a regenerative thermal oxidizer or an equivalent thermal oxidation unit.
- (b) The overall VOC efficiency for the regenerative thermal oxidizer, or an equivalent thermal oxidation unit, (including capture efficiency and destruction efficiency) shall be at least 95%.
- (c) The VOC emissions from the Germ Dryer, Feed Dryer, and Gluten Dryer, identified as 5502-1A, 5502-1B, and 5502-1C, combined shall not exceed 4.89 pounds per hour (lbs/hr).

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for units 40-2, 40-3, 40-4, 575-1, 575-2, 575-3, 5502-1A, 5502-1B, 5502-1C, 5549-1, 5549-2, 5549-28, and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.6 Particulate, Sulfur Dioxide and VOC Control

- (a) In order to comply with Conditions D.1.1, D.1.2 and D.1.4, the RTO, or an equivalent thermal oxidation unit, shall be in operation and control particulate and VOC emissions from units 5502-1A, 5502-1B, and 5502-1C at all times when any of those units are in operation.
- (b) In order to comply with Condition D.1.1(a)(3), the first (1st) effect wash water system shall be in operation and control SO₂ emissions from unit 5502-1A at all times the unit is in operation.
- (c) In order to comply with Conditions D.1.1, D.1.2, and D.1.3, the scrubbers shall be in operation and control particulate emissions from units 40-2, 40-3, 40-4, 575-1, 575-2, 575-3, 5549-1, 5549-2, and 5549-28 at all times those units are in operation.

D.1.7 Testing Requirements [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Condition D.1.1 and D.1.4, the Permittee shall perform SO₂ and VOC testing on emission units 5502-1A, 5502-1B, 5502-1C and 5502-1D, utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

- (b) If emission unit 5502-1D is replaced with an equivalent thermal oxidation unit, not later than 180 days after installation of an equivalent thermal oxidation unit, in order to demonstrate compliance with Condition D.1.1(e) and D.1.4(b), the Permittee shall perform VOC testing on emission units 5502-1A, 5502-1B, 5502-1C, utilizing methods approved by the Commissioner. Testing shall be repeated every five (5) years from the initial test or most recent valid compliance demonstration of an equivalent thermal oxidation unit. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.1.8 Visible Emission Notations

- (a) Visible emission notations of exhaust from stacks 40-2, 40-3, 40-4, 575-1, 575-2, 575-3, 5502-7, 5549-1, 5549-2, and 5549-28 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. A notation of abnormal visible emissions is not a deviation from this permit.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response shall be considered a deviation from this permit.

D.1.9 Parametric Monitoring for Scrubbers, RTO and First (1st) Effect Wash Water System

- (a) The Permittee shall monitor the pH and flow rate of the liquid through the nozzles of the first (1st) effect wash water to the GHE at least once per week of the system used to control SO₂ emissions from unit 5502-1A. When for any one reading the pH of the liquid used in the first (1st) effect wash water is less than 6.5 or the flow rate of the first (1st) effect wash water is below the minimum 400 gallons per minute or a minimum 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 pH or flow rate reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

- (b) The Permittee shall monitor the exhaust air stream pressure drop across each scrubber, and each scrubber make-up rate at least once daily from the scrubbers controlling emissions from units 40-3, 575-1, 575-2, 575-3, 5549-1, 5549-2, and 5549-28 when units 40-3, 575-1, 575-2, 575-3, 5549-1, 5549-2, and 5549-28 are in operation. When, for any one reading, the pressure drop across the scrubbers are outside the normal range of 6.0 to 15.0 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 drop or make-up rate 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.
- (c) The Permittee shall monitor the exhaust air stream pressure drop across each scrubber, and each scrubber make-up rate at least once daily from the scrubbers controlling emissions from units 40-2 and 40-4 when units 40-2 and 40-4 are in operation. When, for any one reading, the pressure drop across the scrubbers are outside the normal range of 3.0 to 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 drop or make-up rate 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.
- (d) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer, or an equivalent thermal oxidation unit, for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until any approved stack test results are available, the Permittee shall take appropriate response steps whenever the three (3) hour average temperature of the thermal oxidizer, or an equivalent thermal oxidation unit, is below 1450°F. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A three (3) hour average temperature that is below 1450°F is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Approved stack test results may reset the three (3) hour average temperature of the thermal oxidizer, or an equivalent thermal oxidation unit, to an alternative temperature and be incorporated via minor modification procedures.
- (e) The instruments used for determining the pH, pressure drop, flow rate and temperature shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated, maintained, and operated according to the Preventive Maintenance Plan.

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

D.1.10 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1(a)(1) and D.1.4(b), the Permittee shall maintain monthly records of the combined input of corn grind for the units identified in Condition D.1.1(a)(1).
- (b) To document the compliance status with Conditions D.1.1(a)(2), the Permittee shall maintain monthly records of the combined input of starch for units 5549-1 and 5549-2.
- (c) To document the compliance status with Condition D.1.1(a)(4), the Permittee shall maintain monthly records of the total input of natural gas consumed by 5502-1A, 5502-1B, 5502-1C, and 5502-1D.

- (d) To document the compliance status with Condition D.1.1(d), the Permittee shall maintain monthly records of the amount of starch produced by unit 40-3.
- (e) To document the compliance status with Condition D.1.3(b), the Permittee shall maintain monthly records of the amount of dry product processed by unit 575-2.
- (f) To document the compliance status with Condition D.1.8, the Permittee shall maintain a daily record of visible emission notations of the exhaust from stacks 40-2, 40-3, 40-4, 575-1, 575-2, 575-3, 5502-7, 5549-1, 5549-2, and 5549-28. 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).
- (g) To document the compliance status with Conditions D.1.1(a)(3) and D.1.9(a), the Permittee shall maintain weekly records of the pH and flow rate of the first (1st) effect wash water during normal operations.
- (h) To document the compliance status with Condition D.1.9(b) and D.1.9(c), the Permittee shall maintain a daily records of the pressure drop across the scrubbers and scrubbers make-up rates during normal operation. 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).
- (i) To document the compliance status with Condition D.1.9(d), the Permittee shall maintain continuous records (on a 3-hour average basis) for the RTO (unit 5502-1D), or an equivalent thermal oxidation unit, combustion chamber temperature during normal operations.
- (j) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.11 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Conditions D.1.1, D.1.3 and D.1.4 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1 (34).

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (n) One (1) DSW Bulk Bag Filler, identified as unit 71-9, with a maximum capacity of 11 tons/hr, using a baghouse* for particulate control, constructed in 1995, and exhausting to stack 71-9; [326 IAC 6.5-1-2]
- (o) One (1) Feed Storage Hopper, identified as unit 5552-1, with a maximum air throughput of 2,450 dscfm, using a baghouse* for particulate control, constructed in 1995, and exhausting to stack 5552-1; [326 IAC 6.5-1-2]
- (p) One (1) Product Transfer Hopper, identified as unit 5552-2, with a maximum air throughput of 350 dscfm, using a baghouse* for control, constructed in 1995, and exhausting to stack 5552-2; [326 IAC 6.5-1-2]
- (q) One (1) Truck Loadout, identified as unit 5503-6, with a maximum throughput of 25 tons/hr, using a baghouse for particulate control, constructed in 1999, and exhausting to stack 5502-3; [326 IAC 6.5-1-2]
- (r) One (1) Germ Bin, one (1) Pellet Bin #1, and one (1) Pellet Bin #2, identified as units 5503-2, 5503-3, and 5503-4 respectively, and with a combined maximum throughput of 120 tons/hr, using a Loadout Dust Collection System for particulate control, identified as 5503-5, each constructed in 1997, and exhausting to stack 5503-2; [326 IAC 6.5-1-2]
- (s) One (1) DSW Packing Fugitive Dust Collector, identified as unit 71-7, with a maximum throughput of 0.1 tons/hr, using a baghouse for particulate control, constructed in 1977, and exhausting to stack 71-7; [326 IAC 6.5-1-2]
- (t) One (1) RSP North Packing Line, identified as unit 577-2, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1979 and modified in 2000, and exhausting to stack 577-2; [326 IAC 6.5-1-2]
- (u) One (1) Gluten Receiver, identified as unit 5503-1, with a maximum throughput of 4.21 tons/hr, using a baghouse* for particulate control, constructed in 1997, and exhausting to stack 5503-1; [326 IAC 6.5-1-2]
- (v) One (1) Pellet Cooler and one (1) Germ Cooler, identified as units 5502-5 and 5502-6, with a maximum throughput of 19.36 tons/hr and 4.21 tons/hr respectively, each using a high efficiency cyclone for particulate control, each constructed in 1997, and exhausting to stacks 5502-5 and 5502-6; [326 IAC 6.5-1-2]
- (w) Two (2) Loose Feed Bins, collectively identified as unit 5502-4, each with a maximum throughput of 19.36 tons/hr, using a baghouse for particulate control, constructed in 1997, and exhausting to stack 5502-3; [326 IAC 6.5-1-2]
- (x) One (1) Hammer Mill, identified as unit 5502-3, with a maximum throughput of 19.36 tons/hr, using a baghouse for particulate control, constructed in 1997, and exhausting to stack 5502-3; [326 IAC 6.5-1-2]
- (y) One (1) DSE Bag Slitter, identified as unit 42-10, with a maximum throughput of 10 tons/hr, using a baghouse for particulate control, constructed in 1987, and exhausting to stack 42-10; [326 IAC 6.5-6-25]

- (z) One (1) P-6 Rework Station, identified as unit 54-1, with a maximum throughput of 7.5 tons/hr, using a baghouse for particulate control, constructed in 1987, and exhausting to stack 54-1; [326 IAC 6.5-1-2]
- (aa) One (1) RSP Hopper #4, identified as unit 577-5, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-5; [326 IAC 6.5-1-2]
- (bb) One (1) RSP Hopper #6, identified as unit 577-6, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-6; [326 IAC 6.5-1-2]
- (cc) One (1) RSP Hopper #5, identified as unit 577-7, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-7; [326 IAC 6.5-1-2]
- (dd) One (1) RSP Hopper #1, identified as unit 577-8, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-8; [326 IAC 6.5-1-2]
- (ee) One (1) RSP Hopper #2, identified as unit 577-9, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-9; [326 IAC 6.5-1-2]
- (ff) One (1) RSP Hopper #3, identified as unit 577-10, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-10; [326 IAC 6.5-1-2]
- (gg) One (1) Industrial Packer, identified as unit 71-1, with a maximum air throughput of 5,300 dscfm, using a baghouse for particulate control, constructed in 1994, and exhausting to stack 71-1; [326 IAC 6.5-6-25]
- (hh) Two (2) Spray Dryer Product Receivers, identified as units 5549-3 and 5549-4, each with a maximum air throughput of 1,700 dscfm, each using a baghouse* for particulate control, each constructed in 1993, and exhausting to stacks 5549-3 and 5549-4; [326 IAC 6.5-1-2]
- (ii) One (1) #1 Spray Dryer Storage Hopper #1, identified as unit 5549-7, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 5549-7; [326 IAC 6.5-1-2]
- (jj) One (1) #1 Spray Dryer Storage Hopper #2, identified as unit 5549-8, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 5549-8; [326 IAC 6.5-1-2]
- (kk) One (1) #2 Spray Dryer Storage Hopper #3, identified as unit 5549-9, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 5549-9; [326 IAC 6.5-1-2]
- (ll) One (1) #2 Spray Dryer Storage Hopper #4, identified as unit 5549-10, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 5549-10; [326 IAC 6.5-1-2]
- (mm) One (1) Agglomerator Feed Storage Bin, identified as unit 5549-12, with a maximum air throughput of 1530 dscfm, using a baghouse* for particulate control, constructed in 1995, and exhausting to stack 5549-12; [326 IAC 6.5-1-2]

- (nn) One (1) Agglomerator, identified as unit 5549-13, with a maximum air throughput of 12,500 dscfm, using a baghouse for particulate control, constructed in 1995, and exhausting to stack 5549-13; [326 IAC 6.5-1-2]
- (oo) One (1) Agglomerator Equipment Aspiration, identified as unit 5549-14, with a maximum air throughput of 2,840 dscfm, using a baghouse** for particulate control, constructed in 1995, and exhausting to stack 5549-14; [326 IAC 6.5-1-2]
- (pp) One (1) spray agglomeration process, constructed in 2000, consisting of the following units:
- (1) Bulk Bag Packer Filter Receiver, identified as unit 5549-17, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, and exhausting to stack 5549-17; [326 IAC 6.5-1-2]
 - (2) Line 1 Middle Packer, identified as unit 5549-18, with a maximum air throughput of 4,600 dscfm, using a baghouse* for particulate control, and exhausting to stack 5549-18; [326 IAC 6.5-1-2]
 - (3) Line 1 North Packer, identified as unit 5549-19, with a maximum air throughput of 5,400 dscfm, using a baghouse* for particulate control, and exhausting to stack 5549-19; [326 IAC 6.5-1-2]
 - (4) #2 Fugitive Dust Collector, identified as emission unit 5549-20, with a maximum throughput of 14,000 dscfm, using a baghouse for particulate control, and exhausting to stack 5549-20; [326 IAC 6.5-1-2]
 - (5) Line 1 Packing ambient D/C, identified as unit 5549-21, with a maximum air throughput of 14,000 dscfm, using a baghouse for particulate control, and exhausting to stack 5549-21; [326 IAC 6.5-1-2]
 - (6) Line 2 Packer, identified as unit 5549-26, with a maximum air throughput of 5,400 dscfm, using a baghouse* for particulate control, and exhausting to stack 5549-26; [326 IAC 6.5-1-2]
- (qq) One (1) West Corn Truck Dump, identified as unit 56-1, with a maximum throughput of 448 tons/hr, using a baghouse for particulate control, constructed prior to 1968, and modified in 1996, and exhausting to stack 56-1; [326 IAC 6.5-6-25]

*The control device is considered both integral to the process and inherent to the process for CAM applicability. Inherent process equipment is not subject to Compliance Assurance Monitoring (CAM). See TSD pages 15 through 19 for additional information.

(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 2-7-5(1)]

D.2.1 Prevention of Significant Deterioration [326 IAC 2-2]

- (a) Pursuant to CP 097-0042-97-01, issued March 24, 1997, M 097-00042-99-01, issued February 25, 1999, MSM 097-11764-00042, issued March 10, 2000, SSM 097-11362-00042, issued August 31, 2000, SPM 097-24287-00042, issued on August 23, 2007, and SPM 097-23497-00042, the following facilities are limited as indicated in the table below:

Unit/ Stack ID	PM/PM ₁₀ Limit (gr/dscf)	PM/PM ₁₀ Limit (lb/hr)	PM/PM ₁₀ Limit (ton/yr)
577-2	0.01	1.29	5.65
577-5	0.009	0.35	1.52
577-6	0.009	0.35	1.52
577-7	0.009	0.35	1.52
577-8	0.009	0.35	1.52
577-9	0.009	0.35	1.52
577-10	0.009	0.35	1.52
5549-3	0.01	0.15	0.64
5549-4	0.01	0.15	0.64
5549-7	0.01	0.039	0.17
5549-8	0.01	0.039	0.17
5549-9	0.01	0.039	0.17
5549-10	0.01	0.039	0.17
5549-12	0.01	0.13	0.57
5549-13	0.01	0.98	4.29
5549-14	0.01	0.24	1.07
5502-3, 5502-4 & 5503-6 (stack 5502-3)	0.01	0.96	4.393
5502-5	0.01	1.13	5.177
5503-1	0.01	1.53	6.977
5503-2 through 5503-5	0.01	0.71	3.11
5502-6	0.01	0.99	4.349
5549-17	0.01	0.04	0.15
5549-18	0.01	0.28	1.21
5549-19	0.01	0.24	1.04
5549-20	0.01	0.93	4.05
5549-21	0.01	1.2	5.27
5549-26	0.01	0.26	1.16
71-9	0.01	0.13	0.57
5552-1	0.01	0.03	0.13
5552-2	0.01	0.21	0.9

- (b) The combined input of corn grind to units 5502-1A (Section D.1), 5502-1B (Section D.1), 5502-1C (Section D.1), 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2, 5503-3, 5503-4, 5503-5, and 5503-6 shall not exceed 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit and the limits set in D.1.1(a) and D.2.1(a) limits PM/PM10 emissions to less than or equal to 43.862 tons per year and will render the requirements of 326 IAC 2-2 not applicable.
- (c) The input of starch to unit 5549-13 shall not exceed 14,010 tons per twelve consecutive month period with compliance determined at the end of each month. The emission rate shall not exceed 0.61 lb PM/PM10 per ton of starch.

Compliance with these limits will render the requirements of 326 IAC 2-2 (Prevention Significant Deterioration) not applicable.

D.2.2 Particulate Matter [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, the particulate matter emissions from units 54-1, 71-7, 71-9, 577-2, 577-5 through 577-10, 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2 through 5503-5, 5503-6, 5549-3, 5549-4, 5549-7 through 5549-10, 5549-12, 5549-13, 5549-14, the spray agglomeration process (consisting of units 5549-17 through 5549-19, 5549-20, 5549-21, and 5549-26), 5552-1, and 5552-2 shall each not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

D.2.3 Particulate Matter [326 IAC 6.5-6-25]

- (a) Pursuant to 326 IAC 6.5-6-25, the particulate matter emissions from facility 42-10 shall not exceed 0.03 gr/dscf and 2.4 tons per year.
- (b) Pursuant to 326 IAC 6.5-6-25, the particulate matter emissions from facility 56-1 shall not exceed 0.02 gr/dscf and 7.02 tons per year.
- (c) Pursuant to 326 IAC 6.5-6-25, the particulate matter emissions from facility 71-1 shall not exceed 0.03 gr/dscf and 0.9 tons per year.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for facilities 42-10, 54-1, 56-1, 71-1, 71-7, 71-9, 577-2, 577-5 through 577-10, 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2 through 5503-5, 5503-6, 5549-3, 5549-4, 5549-7 through 5549-10, 5549-12, 5549-13, 5549-14, 5549-17 through 5549-19, 5549-20, 5549-21, 5549-26, 5552-1, 5552-2, and their respective control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.2.5 Particulate Control

- (a) In order to comply with Conditions D.2.1, D.2.2, and D.2.3, the respective baghouses for particulate control, including those integral to the process, shall be in operation and control particulate emissions from the respective facilities listed in this section at all times those facilities are in operation.
- (b) In order to comply with Conditions D.2.1 and D.2.2, the high efficiency cyclones for particulate control shall be in operation and control particulate emissions from facilities 5502-5 and 5502-6 at all times the respective facilities are in operation.

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

D.2.6 Visible Emissions Notations

- (a) Visible emission notations of the exhaust from stacks 42-10, 56-1, 71-7, 71-9, 577-2, 577-5 through 577-10, 5502-3, 5502-5, 5502-6, 5503-1, 5503-2, 5549-3, 5549-4, 5549-7 through 5549-10, 5549-12, 5549-13, 5549-14, 5549-17 through 5549-19, 5549-20, 5549-21, 5549-26, 5552-1, and 5552-2 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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 the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.7 Parametric Monitoring for Baghouses

- (a) The Permittee shall record the pressure drop across the baghouses used in conjunction with units 56-1, 71-7, 577-2, 5503-6, and 5549-13 at least once per day when units 56-1, 71-7, 577-2, 5503-6, and 5549-13 are in operation. When, for any one reading, the pressure drop across the baghouses are outside the normal range of 1.0 to 8.0 inches of water or a range established during the last 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 Permittee shall record the pressure drop across the baghouses used in conjunction with units 5503-2, 5503-3, 5503-4, 5549-20, and 5549-21 at least once per day when units 5503-2, 5503-3, 5503-4, 5549-20, and 5549-21 are in operation. When, for any one reading, the pressure drop across the baghouses are outside the normal range of 0.5 to 7.0 inches of water or a range established during the last 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.
- (c) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with units 5502-3, and 42-10 at least once per day when units 5502-3, and 42-10 are in operation. When, for any one reading, the pressure drop across the baghouses are outside the normal range of 1.0 to 8.0 inches of water or a range established during the last 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.

- (d) 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, maintained, and operated according to the Preventive Maintenance Plan.

D.2.8 Broken or Failed Bag Detection

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

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

D.2.9 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. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.2.10 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.1(c), the Permittee shall maintain monthly records of the input of starch for unit 5549-13.
- (b) To document the compliance status with Condition D.2.6, the Permittee shall maintain a daily record of visible emission notations of the exhaust from stacks 42-10, 56-1, 71-7, 71-9, 577-2, 577-5 through 577-10, 5502-3, 5502-5, 5502-6, 5503-1, 5503-2, 5549-3, 5549-4, 5549-7 through 5549-10, 5549-12, 5549-13, 5549-14, 5549-17 through 5549-19, 5549-20, 5549-21, 5549-26, 5552-1, and 5552-2. 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).
- (c) To document the compliance status with Condition D.2.7, the Permittee shall maintain a daily record of the pressure drop across the baghouses used in conjunction with units 42-10, 56-1, 71-7, 577-2, 5502-3, 5503-2, 5503-3, 5503-4, 5503-6, 5549-13, 5549-20, and 5549-21. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

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

The records used to document compliance with Conditions D.1.1(a) are sufficient to document compliance with Conditions D.2.1(b).

D.2.11 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.2.1(b) and (c) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1 (34).

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (rr) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations: [326 IAC 2-7-1(21)(G)(xxiii)]
- (1) One (1) DSE Hopper #9, identified as unit 42-3A, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 6; [326 IAC 6.5-6-25]
 - (2) One (1) DSE Hopper #10, identified as unit 42-3B, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 7; [326 IAC 6.5-6-25]
 - (3) One (1) DSE Hopper #11, identified as unit 42-3C, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 43-3C; [326 IAC 6.5-6-25]
 - (4) One (1) DSE Hopper #12, identified as unit 42-3D, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 9; [326 IAC 6.5-6-25]
 - (5) One (1) DSE Hopper #13, identified as unit 42-3E, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 10; [326 IAC 6.5-6-25]
 - (6) One (1) DSE Hopper #14, identified as unit 42-3F, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 11; [326 IAC 6.5-6-25]
 - (7) One (1) DSE Hopper #2, identified as unit 42-7A, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 14; [326 IAC 6.5-6-25]
 - (8) One (1) DSE Hopper #4, identified as unit 42-7B, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 14; [326 IAC 6.5-6-25]
 - (9) One (1) DSE Hopper #6, identified as unit 42-7C, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 16; [326 IAC 6.5-6-25]
 - (10) One (1) DSE Hopper #1, identified as unit 42-8A, with a maximum throughput of 10 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 17A; [326 IAC 6.5-1-2]
 - (11) One (1) DSE Hopper #3, identified as unit 42-8B, with a maximum throughput of 10 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 17B; [326 IAC 6.5-1-2]

- (12) One (1) DSE Hopper #5, identified as unit 42-8C, with a maximum throughput of 10 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 17C; [326 IAC 6.5-1-2]
- (13) One (1) DSE Hopper #7, identified as unit 42-8D, with a maximum throughput of 10 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 17D; [326 IAC 6.5-1-2]
- (14) One (1) CWS #8 Mill Receiver; identified as unit 63-1A, with a maximum throughput of 1 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and modified in 1976, and exhausting to stack 46; [326 IAC 6.5-1-2]
- (15) One (1) CWS Entoleter Mill; identified as unit 63-17, with a maximum throughput of 0.8 tons/hr, using a baghouse** for particulate control, constructed in 1977, and exhausting to stack 53; [326 IAC 6.5-1-2]
- (ss) One (1) Grain Elevator, identified as unit 56-2, with a maximum throughput of 80 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 24; [326 IAC 6.5-6-25]
- (tt) Starch operations, starch drying, starch handling and starch packaging consisting of the following units:
 - (1) One (1) Filter Receiver, identified as 152-1, with a maximum air throughput of 500 dscfm, using a baghouse* for particulate control, constructed in 2002, and exhausting to stack 152-1; [326 IAC 6.5-1-2]
 - (2) One (1) Mixer baghouse, identified as 152-2, with a maximum air throughput of 20 dscfm, using a baghouse* for particulate control, constructed in 2002, and exhausting to stack 152-2; [326 IAC 6.5-1-2]
 - (3) One (1) Starch Cooler Filter Receiver, identified as 152-3 (Bld 852), with a maximum air throughput of 589 dscfm, using a baghouse* for particulate control, constructed in 2002, and exhausting to stack 152-3; [326 IAC 6.5-1-2]
 - (4) One (1) Starch Mixer 2 Filter/Receiver, identified as 152-4 (Bld 852A), with a maximum air throughput of 600 dscfm, using a baghouse* for particulate control, constructed on in 2002, and exhausting to stack 152-4; [326 IAC 6.5-1-2]
 - (5) One (1) Starch Mixer 2, identified as 152-5 (Bld 852A), with a maximum air throughput of 1000 dscfm, using a baghouse* for particulate control, constructed in 2002, and exhausting to stack 152-5; [326 IAC 6.5-1-2]
 - (6) One (1) Starch Storage Hopper, identified as 152-6, with a maximum throughput of 15 tons/hr, using a baghouse** for particulate control, constructed in 2003, and exhausting to stack 152-6; [326 IAC 6.5-1-2]
 - (7) One (1) Starch Hopper D/C, identified as 128-3, with a maximum throughput of 12.5 tons/hr, using a baghouse* for particulate control, constructed in 1983 and modified in 2000, and exhausting to stack 128-3; [326 IAC 6.5-1-2]
 - (8) One (1) DSW Chemical Blender Bag Slitter, identified as unit 61-15, with a maximum throughput of 7.5 tons/hr, using a baghouse** for particulate control, constructed prior to 1974, and exhausting to stack 35; [326 IAC 6.5-1-2]

- (9) One (1) DSE Hopper #8, identified as unit 42-4, with a maximum throughput of 13.95 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 17E; [326 IAC 6.5-6-25]
- (10) One (1) Dextrin #1 System Cooler Conveyor, identified as unit 61-3, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1973, and exhausting to stack 27; [326 IAC 6.5-1-2]
- (11) One (1) Dextrin Flash Dryer, identified as unit 61-9, with a maximum throughput of 5 tons/hr, using a cyclone and a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 30; [326 IAC 6.5-6-25]
- (12) One (1) Dextrin #3 System Cooler, identified as unit 61-22, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 41; [326 IAC 6.5-1-2]
- (13) One (1) Dextrin #2 System Cooler Conveyor, identified as unit 61-23, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 42; [326 IAC 6.5-1-2]
- (14) One (1) CWS South Conveying, identified as unit 63-4, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 48; [326 IAC 6.5-1-2]
- (15) One (1) CWS North Conveying, identified as unit 63-5, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 49; [326 IAC 6.5-1-2]
- (16) One (1) DSE North Packer, identified as unit 42-1, with a maximum throughput of 30 tons/hr, using a baghouse* for particulate control, constructed prior to 1968 and modified in 1996, and exhausting to stack 5; [326 IAC 6.5-6-25]
- (17) One (1) DSE South Packer, identified as unit 42-9, with a maximum throughput of 30 tons/hr, using a baghouse* for particulate control, constructed prior to 1968 and modified in 1996, and exhausting to stack 18; [326 IAC 6.5-1-2]
- (18) One (1) sodium sulfate conveying system, identified as unit 40-1, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 1; [326 IAC 6.5-1-2]
- (19) One (1) DSE Negative Receiver, identified as unit 42-6, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 13; [326 IAC 6.5-6-25]
- (20) One (1) DSE Railcar Loading - East Track, identified as unit 42-11, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 20; [326 IAC 6.5-1-2]
- (21) One (1) DSE Railcar Loading - West Track, identified as unit 42-12, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 21; [326 IAC 6.5-1-2]
- (22) One (1) Dextrin #1 System Mixer, identified as unit 61-1, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1973, and exhausting to stack 25; [326 IAC 6.5-1-2]

- (23) One (1) Dextrin #1 System Cookers, identified as unit 61-2, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1973, and exhausting to stack 26; [326 IAC 6.5-1-2]
- (24) One (1) Dextrin #2 System Mixer, identified as unit 61-6, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1974, and exhausting to stack 28; [326 IAC 6.5-6-25]
- (25) Two (2) Dextrin #2 System East and West Tanks, identified as unit 61-7, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1974, and exhausting to stack 29; [326 IAC 6.5-1-2]
- (26) One (1) Starch Storage Silo #3 Receiver, identified as unit 61-11, with a maximum throughput of 7.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 31; [326 IAC 6.5-1-2]
- (27) One (1) Starch Storage Silo #1 Receiver, identified as unit 61-12, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 32; [326 IAC 6.5-1-2]
- (28) One (1) Starch Storage Silo #1, identified as unit 61-13, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 33; [326 IAC 6.5-1-2]
- (29) One (1) Dextrin #1 System Packer, identified as unit 61-14, with a maximum throughput of 7.5 tons/hr, using hopper/filter receiver using a baghouse** for particulate control, constructed prior to 1973, and exhausting to stack 61-14; [326 IAC 6.5-6-25]
- (30) One (1) DSW Chemical Blender Tank; identified as unit 61-14A, with a maximum throughput of 7.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 34; [326 IAC 6.5-6-25]
- (31) One (1) Dextrin System Acidifiers; identified as unit 61-16, with a maximum air throughput of 1,530 dscfm, using a baghouse* for particulate control, constructed in 1973, and exhausting to stack 36; [326 IAC 6.5-1-2]
- (32) One (1) Dextrin #2 System Cooler; identified as unit 61-18, with a maximum air throughput of 2,300 dscfm, using a baghouse* for particulate control, constructed in 1974, and exhausting to stack 37; [326 IAC 6.5-1-2]
- (33) One (1) Dextrin #3 System Cookers; identified as unit 61-19, with a maximum air throughput of 2,300 dscfm, using a baghouse* for particulate control, constructed in 1974, and exhausting to stack 38; [326 IAC 6.5-1-2]
- (34) One (1) Starch Storage Silo #2; identified as unit 61-20, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 39; [326 IAC 6.5-1-2]
- (35) One (1) Starch Storage Silo #2 Receiver; identified as Bin TF41820 (formerly unit 61-21), with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed in 1976, modified in 1981, approved in 2010 for additional modification, and exhausting to stack TF41820; [326 IAC 6.5-1-2]

- (36) One (1) Dextrin #3 System Mixer; identified as unit 61-24, with a maximum air throughput of 410 dscfm, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 43; [326 IAC 6.5-1-2]
- (37) One (1) Dextrin #3 System West Tank; identified as unit 61-25, with a maximum air throughput of 350 dscfm, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 44; [326 IAC 6.5-1-2]
- (38) One (1) Dextrin #3 System East Tank; identified as unit 61-26, with a maximum air throughput of 350 dscfm, using a baghouse** for particulate control, constructed in 1976, and exhausting to stack 45; [326 IAC 6.5-1-2]
- (39) One (1) CWS #7 Dryer Receiver; identified as unit 63-3, with a maximum air throughput of 2000 dscfm, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 47; [326 IAC 6.5-1-2]
- (40) One (1) CWS Packer; identified as unit 63-9, with a maximum throughput of 20 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 50; [326 IAC 6.5-1-2]
- (41) One (1) Liquid Glue Bag Dump; identified as unit 63-12, with a maximum throughput of 8 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 51; [326 IAC 6.5-1-2]
- (42) One (1) CWS #9 and #10 Dryers Receiver; identified as unit 63-15, with a maximum air throughput of 3,600 dscfm, using a baghouse* for particulate control, constructed in 1975 and modified in 2010, and exhausting to stack 52; [326 IAC 6.5-1-2]
- (43) One (1) CWS #11, #12, and #13 Dryers; identified as unit 63-16, with a maximum air throughput of 3,300 dscfm, using a baghouse* for particulate control, constructed in 1977, and exhausting to stack 54; [326 IAC 6.5-1-2]
- (44) One (1) CWS South Raw Material Dump; identified as unit 63-18, with a maximum throughput of 3.5 tons/hr, using a baghouse** for particulate control, constructed in 1977, and exhausting to stack 55; [326 IAC 6.5-1-2]
- (45) One (1) DSW Negative Receiver; identified as unit 63-20, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 56; [326 IAC 6.5-1-2]
- (46) Two (2) DSW Hoppers #17 and #18; identified as unit 71-2, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 58; [326 IAC 6.5-6-25]
- (47) One (1) Dextrin Packer; identified as unit 71-3, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 71-3; [326 IAC 6.5-1-2]
- (48) One (1) DSW Hopper #13, identified as unit 71-4A, with a maximum throughput of 2.5 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 67; [326 IAC 6.5-6-25]

- (49) One (1) DSW Hopper #1; identified as unit 71-5A, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 59; [326 IAC 6.5-6-25]
- (50) One (1) DSW Hopper #2; identified as unit 71-5B, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 60; [326 IAC 6.5-6-25]
- (51) One (1) DSW Hopper #3; identified as unit 71-5C, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 61; [326 IAC 6.5-6-25]
- (52) One (1) DSW Hopper #4; identified as unit 71-5D, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 62; [326 IAC 6.5-6-25]
- (53) One (1) DSW Hopper #5; identified as unit 71-5E, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 63; [326 IAC 6.5-6-25]
- (54) One (1) DSW Hopper #6; identified as unit 71-5F, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 64; [326 IAC 6.5-6-25]
- (55) One (1) DSW Hopper #7; identified as unit 71-5G, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 65; [326 IAC 6.5-6-25]
- (56) One (1) DSW Hopper #8; identified as unit 71-5H, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 66; [326 IAC 6.5-6-25]
- (57) One (1) DSW Hopper #9; identified as unit 71-5I, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 71-5I; [326 IAC 6.5-6-25]
- (58) One (1) DSW Hopper #10; identified as unit 71-5J, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 8; [326 IAC 6.5-6-25]
- (59) One (1) DSW Hopper #11; identified as unit 71-5K, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 69; [326 IAC 6.5-6-25]
- (60) One (1) DSW Hopper #12; identified as unit 71-5L, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 70; [326 IAC 6.5-6-25]
- (61) One (1) DSW Bulk Car Loading; identified as unit 71-8, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed in 1971, and exhausting to stack 72; [326 IAC 6.5-1-2]

- (62) One (1) RSP Bulk Bag Packing; identified as unit 577-1, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 77; [326 IAC 6.5-1-2]
- (63) One (1) RSP Bulk Loading System A; identified as unit 577-4, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 80; [326 IAC 6.5-1-2]
- (64) One (1) RSP Bulk Loading Fugitive Dust Collector**; identified as unit 577-4A, with a maximum throughput of 18 tons/hr and an actual throughput of 18 lbs/hr, constructed in 1986, and exhausting to stack 81; [326 IAC 6.5-1-2]
- (65) One (1) CWS Packing Hopper; identified as unit 578-2, with a maximum throughput of 1 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 89; [326 IAC 6.5-1-2]
- (66) One (1) CWS Milling System, identified as unit 578-3, with a maximum throughput of 1.5 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 90; [326 IAC 6.5-1-2]
- (67) One (1) Starch Cooling and Conveying System, identified as TF41818 (formerly unit 581-2), with a maximum air throughput of 14,000 dscfm, using a baghouse* for particulate control, constructed in 1983, approved in 2010 for modification, and exhausting to stack TF41818; [326 IAC 6.5-1-2]
- (68) One (1) RSP South Packing Line, identified as unit 577-3, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 79; [326 IAC 6.5-1-2]
- (69) One (1) Starch Filter/Receiver 2 Bld 852, identified as unit 152-7, with a maximum air throughput of 500 dscfm, using a baghouse** for particulate control, constructed in 2004, and exhausting to stack 152-7; [326 IAC 6.5-1-2]
- (70) One (1) Starch Mixer 4 Bld 852A Filter Receiver, identified as unit 152-8, with a maximum air throughput of 600 dscfm, using a baghouse** for particulate control, constructed in 2004, and exhausting to stack 157-8; [326 IAC 6.5-1-2]
- (71) One (1) Starch Mixer 4 Bld 852A, identified as unit 152-9, with a maximum air throughput of 20 dscfm, using a baghouse** for particulate control, constructed in 2004, and exhausting to stack 152-9; [326 IAC 6.5-1-2]
- (72) One (1) Starch Mixer 3 Bld 852A Filter Receiver, identified as unit 152-10, with a maximum air 600 dscfm, using a baghouse** for particulate control, constructed in 2004, and exhausting to stack 152-10; [326 IAC 6.5-1-2]
- (73) One (1) Starch Mixer 3 Bld 852A, identified as unit 152-11, with a maximum air throughput of 20 dscfm, using a baghouse** for particulate control, constructed in 2004, and exhausting to stack 152-11; [326 IAC 6.5-1-2]
- (74) One (1) FG Bulk Bag Bin Vent Bld 800, identified as unit FA-60582, with a maximum throughput of 18 tons/hr using a baghouse** for particulate control, constructed in 2003, and exhausting to stack FA-60582; [326 IAC 6.5-1-2]

- (75) One (1) Blending Bin, identified as unit TF31901, with a maximum air throughput of 2,000 dscfm, using product recovery DC-31901** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 1-158; [326 IAC 6.5-1-2]
- (76) One (1) Base Bin, identified as unit TF31902, with a maximum air throughput of 200 dscfm, using product recovery DC-31901** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 2-158; [326 IAC 6.5-1-2]
- (77) One (1) Product Bin, identified as unit TF31991, with a maximum air throughput of 200 dscfm, using product recovery DC-31991** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 3-158; [326 IAC 6.5-1-2]
- (78) One (1) Surge Tank Bin, identified as unit SH31913, with a maximum air throughput of 200 dscfm, using product recovery DC-31911** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 7-158; [326 IAC 6.5-1-2]
- (79) One (1) Bulk Bag Unload Bin, identified as unit DC-31900 (Bld 630) with a maximum air throughput of 600 dscfm, using a dust collector* for particulate control, constructed in 2004, and exhausting to stack 8-158; [326 IAC 6.5-1-2]
- (80) One (1) FBR exhaust, identified as unit TR31912, with a maximum air throughput of 8,800 dscfm, using product recovery metal filters** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 5-158 [326 IAC 6.5-1-2]
- (81) One (1) starch dryer, identified as unit T-1, with a maximum production rate of 300 lbs/hr, using a product collector/cyclone and dust collector* for particulate control, constructed in 2005, and exhausting to stack T-1; [326 IAC 6.5-1-2]
- (82) One (1) Line 1 South Packing Hopper, identified as unit 5549-22, with a maximum air throughput of 4,800 dscfm, using a baghouse* for particulate control, constructed in 2006, and exhausting to stack 5549-22. [326 IAC 6.5-1-2]
- (83) One (1) CSW conveying cyclone operation, identified as unit 578-1, with a maximum throughput of 7.5 tons/hr, using a baghouse** for particulate control, returned to service in 2008, and exhausting through stack 578-1. [326 IAC 6.5-1-2]
- (84) One (1) Blending Bin, identified as TF41819, with a maximum air throughput of 4,000 dscfm, using a baghouse* for particulate control, approved in 2010 for construction, and exhausting to stack DC41819 [326 IAC 6.5-1-2]

*The control device is considered both integral to the process and inherent to the process for CAM applicability. Inherent process equipment is not subject to Compliance Assurance Monitoring (CAM). See TSD pages 15 through 19 for additional information.

**The control device is considered inherent to the process for CAM applicability. Inherent process equipment is not subject to Compliance Assurance Monitoring (CAM). See TSD pages 19 through 25 for additional information.

Emissions Unit Description: Specifically Regulated Insignificant Activities

- (a) Combustion related activities including spaces heaters, process heaters, or boilers using natural gas-fired with heat input equal to or less than ten million (10,000,000) British thermal units per hour;

(1) One (1) process heater, Bld 630, natural gas fired, with maximum heat input capacity of 5.1 MMBtu/hr, identified as unit YX31914A, constructed in 2004 and venting out stack 158-6. [326 IAC 6-2-4]

(b) Cleaners and solvents, from operations M1 through M4 and RSP shop, characterized as:

(1) having a vapor pressure equal to or less than two (2.0) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pound per square inch) measured at thirty-eight (38) degrees Centigrade (one hundred (100) degrees Fahrenheit); or

(2) having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit);

the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months. [326 IAC 8-3-2] [326 IAC 8-3-5]

(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 2-7-5(1)]

D.3.1 PSD and Nonattainment NSR Minor Limits [326 IAC 2-2] [326 IAC 2-1.1-5]

In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the PM, PM10 and PM2.5 emissions from stacks TF41818, DC41819, and TF41820 shall be less than the emission limits listed in the table below:

Equipment Description	Stack ID	PM Emission Limit (lb/hr)	PM10 Emission Limit (lb/hr)	PM2.5 Emission Limit (lb/hr)
One (1) Starch Cooling and Conveying System	stack TF41818	3.97	2.38	1.59
One (1) Blending Bin	stack DC41819	1.12	0.67	0.45
One (1) Starch Storage Silo #2 Receiver	stack TF41820	0.55	0.33	0.22

Compliance with the above limits will ensure that the potential to emit from this modification is less than twenty-five (25) tons of PM per year, less than fifteen (15) tons of PM₁₀ per year, and less than ten (10) tons of PM_{2.5} per year; and therefore will render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

D.3.2 Particulate Matter [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, the particulate matter emissions from units 40-1, 42-6, 42-9, 42-11, 42-12, 61-1, 61-2, 61-3, 61-7, 61-11, 61-12, 61-13, 61-15, 61-16, 61-18 through 61-20, 61-22, 61-23, 61-24 through 61-26, 63-1A, 63-4, 63-5, 63-6, 63-9, 63-12, 63-15, 63-16, 63-17, 63-18, 63-20, 71-3, 71-4A, 71-8, 128-3, 152-1 through 152-11, 577-1, 577-3, 577-4, 577-4A, 578-1, 578-2, 578-3, 5549-22, DC-31900, FA-60582, SH31913, TF31901, TF31902, TR31912, TF31991, T-1, TF41818, TF41819 and TF41820 shall each not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

D.3.3 Particulate Matter [326 IAC 6.5-6-25]

Pursuant to 326 IAC 6.5-6-25, the following insignificant activities are limited as indicated in the table below:

Facility	PM Limit (gr/dscf)	PM Limit (ton/yr)
56-2	0.01	11.3
71-2	0.03	2.6
61-6	0.03	0.1
61-14A	0.029	0.6
61-14	0.028	1.2
42-4	0.029	2.3
61-9	0.016	4.1
42-1	0.03	0.9
42-6	0.03	2.5
42-8	0.03	4.2
42-7A	0.032	1.7
42-7B	0.032	1.7
42-7C	0.032	1.7
42-3A	0.032	1.8
42-3B	0.032	1.8
42-3C	0.032	1.8
42-3D	0.032	1.8
42-3E	0.032	1.8
42-3F	0.032	1.8
71-4A	0.026	0.3
71-5A	0.026	0.3
71-5B	0.026	0.3
71-5C	0.026	0.3
71-5D	0.026	0.3
71-5E	0.026	0.3
71-5F	0.026	0.3
71-5G	0.026	0.3
71-5H	0.026	0.3
71-5I	0.026	0.3
71-5J	0.026	0.3

Facility	PM Limit (gr/dscf)	PM Limit (ton/yr)
71-5K	0.026	0.3
71-5L	0.026	0.3

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for units 40-1, 42-1, 42-3A through 42-3F, 42-4, 42-6, 42-7A, 42-7B, 42-7C, 42-8A through 42-8D, 42-9, 42-11, 42-12, 56-2, 61-1, 61-2, 61-3, 61-6, 61-7, 61-9, 61-11, 61-12, 61-13, 61-14, 61-14A, 61-15, 61-16, 61-18 through 61-20, 61-22, 61-23, 61-24 through 61-26, 63-1A, 63-4, 63-5, 63-6, 63-9, 63-12, 63-15, 63-16, 63-17, 63-18, 63-20, 71-2, 71-3, 71-4A, 71-5A through 71-5L, 71-8, 128-3, 152-1 through 152-11, 577-1, 577-3, 577-4, 577-4A, 578-1, 578-2, 578-3, 5549-22, DC-31900, FA-60582, SH31913, TF31901, TF31902, TR31912, TF31991, T-1, TF41818, TF41819 and TF41820, and their respective control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

D.3.5 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the process heater, identified as YX31914A, shall each be limited to 0.71 pound per MMBtu heat input, which was calculated using the following equation:

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

D.3.6 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning degreasing operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements; and
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.7 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^oC) (one hundred twenty degrees Fahrenheit (120^oF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

- (1) Close the cover whenever articles are not being handled in the degreaser.
- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination Requirements

D.3.8 Particulate Control

In order to comply with Conditions D.3.1, D.3.2, and D.3.3, the baghouses for particulate control, including those integral to the process, shall be in operation and control particulate emissions from all facilities listed in this section at all times those respective facilities are in operation.

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

D.3.9 Visible Emissions Notations

- (a) Visible emission notations of the exhaust from stacks TF41818, DC41819, and TF41820 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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 the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.3.10 Parametric Monitoring for Baghouses

- (a) The Permittee shall record the pressure drop across the baghouses used in conjunction with units TF41818, TF41819, and TF41820 at least once per day when units TF41818, TF41819, and TF41820 are in operation. When, for any one reading, the pressure drop across the baghouses are outside the normal range of 1.0 to 8.0 inches of water or a range established during the last 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, maintained, and operated according to the Preventive Maintenance Plan.

D.3.11 Broken or Failed Bag Detection

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

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

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

D.3.12 Record Keeping Requirements

- (a) To document the compliance status with Condition D.3.9, the Permittee shall maintain a daily record of visible emission notations of the exhaust from stacks TF41818, DC41819, and TF41820. 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.3.10, the Permittee shall maintain a daily record of the pressure drop across the baghouses used in conjunction with units TF41818, TF41819, and TF41820. 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) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: National Starch LLC
Source Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-26765-00042

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: National Starch LLC
Source Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-26765-00042

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: National Starch LLC
Source Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-26765-00042
Facilities: 5502-1A, 5502-1B, 5502-1D, 5502-3, 5502-4, 5502-5, 5502-6, 5502-7, 5503-1, 5503-2, 5503-3, 5503-4, 5503-5, and 5503-6
Parameter: Combined input of corn grind in bushels per twelve consecutive month period
Limit: The combined input of corn grind to units 5502-1A, 5502-1B, 5502-1C, 5502-3, 5502-4, 5502-5, 5502-6, 5502-7, 5503-1, 5503-2, 5503-3, 5503-4, 5503-5, and 5503-6 shall not exceed 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Corn grind (bushels)	Corn grind (bushels)	Corn grind (bushels)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

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

Part 70 Quarterly Report

Source Name: National Starch LLC
Source Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-26765-00042
Facilities: 5549-1 and 5549-2
Parameter: Combined input of starch in tons per twelve consecutive month period
Limit: The combined input of starch for units 5549-1 and 5549-2 shall not exceed 22,500 tons per twelve consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Starch (tons)	Starch (tons)	Starch (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

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

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

Part 70 Quarterly Report

Source Name: National Starch LLC
Source Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-26765-00042
Facilities: 5502-1A, 5502-1B, 5502-1C, and 5502-1D
Parameter: Total natural gas usage
Limit: The combined input of natural gas to 5502-1A, 5502-1B, 5502-1C, and 5502-1D shall not exceed 1,780 million cubic feet (MMcf) per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit is equivalent to total NO_x emissions of less than or equal to 39 tons per twelve consecutive month period.

QUARTER: _____ YEAR: _____

Month	Natural Gas (MMscf)	Natural Gas (MMscf)	Natural Gas (MMscf)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

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

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

Part 70 Quarterly Report

Source Name: National Starch LLC
Source Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-26765-00042
Facilities: 5549-13
Parameter: Input of starch in tons per twelve consecutive month period
Limit: The input of starch to unit 5549-13 shall not exceed 14,010 tons per twelve consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Starch (tons)	Starch (tons)	Starch (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

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

Part 70 Quarterly Report

Source Name: National Starch LLC
Source Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-26765-00042
Facility: 575-2
Parameter: Amount of dry product processed in tons per twelve consecutive month period
Limit: The amount of dry product processed by unit 575-2 shall not exceed 123,300 tons per twelve month consecutive period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Dry product (tons)	Dry product (tons)	Dry product (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

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

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

Part 70 Quarterly Report

Source Name: National Starch LLC
Source Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-26765-00042
Facility: 40-3
Parameter: Amount of starch produced tons per twelve consecutive month period
Limit: The starch produced from unit 40-3 shall not exceed 145,610 tons per twelve consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Starch produced (tons)	Starch produced (tons)	Starch produced (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: National Starch LLC
Source Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-26765-00042

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

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

Source Background and Description

Source Name:	National Starch LLC
Source Location:	1515 South Drover Street, Indianapolis, Indiana 46221
County:	Marion
SIC Code:	2046
Operation Permit Renewal No.:	T097-26765-00042
Operation Permit Issuance Date:	April 16, 2010
Significant Permit Modification No.:	097-29534-00042
Permit Reviewer:	Sarah Conner, Ph. D.

On September 22, 2010, the Office of Air Quality (OAQ) had a notice published in the *Indianapolis Star*, in Indianapolis, Indiana, stating that National Starch LLC had applied to operate a new blending bin and to relocate and modify two existing units, a starch storage silo receiver and a starch cooling and conveying system. In addition, the source asked that emission unit descriptions for two existing units, a feed storage hopper and product transfer hopper be corrected. The notice stated that National Starch LLC had applied to construct new emission units and modify existing units at their existing stationary wet corn milling plant which produces feed, gluten meal, germ meal, and heavy steepwater. The notice also stated that OAQ proposed to issue a Significant Permit Modification for this source and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Additional Changes

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

On October 8, 2010, during public notice, National Starch LLC submitted an Administrative Amendment application requesting a correction to the flow rate listed in permit condition D.1.9 (a) for the first (1st) effect wash water from 500 gallons per minute to 400 gallons per minute. Second Administrative Amendment No. 097-29768-00042 was issued on October 18, 2010. Changes were made to the first page of Significant Permit Modification No. 097-29534-00042 and to Condition D.1.9 as follows:

...

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

Operating Permit No.: T097-26765-00042	
Issued By:/Original Signed By: Alfred C. Dumauual, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: April 16, 2010 Expiration Date: April 16, 2015

First Administrative Amendment No. 097-29351-00042, issued July 19, 2010

Second Administrative Amendment No. 097-29768-00042, issued October 18, 2010

First Significant Permit Modification No.: 097-29534-00042	
Issued by: Donald F. Robin, P.E., Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: April 16, 2015

...

D.1.9 Parametric Monitoring for Scrubbers, RTO and First (1st) Effect Wash Water System

- (a) The Permittee shall monitor the pH and flow rate of the liquid through the nozzles of the first (1st) effect wash water to the GHE at least once per week of the system used to control SO₂ emissions from unit 5502-1A. When for any one reading the pH of the liquid used in the first (1st) effect wash water is less than 6.5 or the flow rate of the first (1st) effect wash water is below the minimum ~~500~~ **400** gallons per minute or a minimum 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 pH or flow rate reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

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

Source Description and Location

Source Name:	National Starch LLC
Source Location:	1515 South Drover Street, Indianapolis, Indiana 46221
County:	Marion
SIC Code:	2046
Operation Permit Renewal No.:	T097-26765-00042
Operation Permit Issuance Date:	April 16, 2010
Significant Permit Modification No.:	097-29534-00042
Permit Reviewer:	Sarah Conner, Ph. D.

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T097-26765-00042 on April 16, 2010. The source has since received the following approvals:

- (a) Administrative Amendment No. 097-29351-00042, issued on July 19, 2010.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, 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	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.

Basic nonattainment designation effective federally 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. Marion 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}**
Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
Marion County has been classified as attainment or unclassifiable in Indiana for all other regulated pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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.

Source Status

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

Pollutant	Emissions (ton/yr)
PM	greater than 250
PM ₁₀	greater than 250
PM _{2.5}	greater than 250
SO ₂	36.2
VOC	32.7
CO	153.6
NO _x	171.8
Total HAPs	7.72

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is a major stationary source, under nonattainment new source review rules (326 IAC 2-1.1-5) since direct PM_{2.5} is emitted at a rate of 100 tons per year or more.
- (c) These emissions are based upon Part 70 Operating Permit Renewal No. T097-26765-00042, issued on April 16, 2010.
- (d) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by National Starch LLC on August 5, 2010, relating to the construction of a new blending bin, and the relocation and modification of two existing units, a starch storage silo receiver and a starch cooling and conveying system. In addition, the source asked that emission unit descriptions for two existing units, a feed storage hopper and product transfer hopper be corrected.

(1) The following is a list of the proposed emission unit and pollution control device:

(tt) Starch operations, starch drying, starch handling and starch packaging consisting of the following units:

...

(84) One (1) Blending Bin, identified as TF41819, with a maximum air throughput of 4,000 dscfm, using a baghouse* for particulate control, approved in 2010 for construction, and exhausting to stack DC41819 [326 IAC 6.5-1-2]

(2) The following is a list of the modified emission unit(s) and pollution control device(s):

...

(tt) Starch operations, starch drying, starch handling and starch packaging consisting of the following units:

...

(35) One (1) Starch Storage Silo #2 Receiver; identified as Bin TF41820 (formerly unit 61-21), with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed in 1976, modified in 1981, approved in 2010 for additional modification, and exhausting to stack TF41820; [326 IAC 6.5-1-2]

(67) One (1) Starch Cooling and Conveying System, identified as TF41818 (formerly unit 581-2), with a maximum air throughput of 14,000 dscfm, using a baghouse* for particulate control, constructed in 1983, approved in 2010 for modification, and exhausting to stack TF41818; [326 IAC 6.5-1-2]

*The control device is considered both integral to the process and inherent to the process for CAM applicability. Inherent process equipment is not subject to Compliance Assurance Monitoring (CAM).

**The control device is considered inherent to the process for CAM applicability. Inherent process equipment is not subject to Compliance Assurance Monitoring (CAM).

(3) The descriptions for the following emission unit(s) and pollution control device(s) have been updated:

(o) One (1) Feed Storage Hopper, identified as unit 5552-1, with a maximum air throughput of 2,450 dscfm, using a baghouse* for particulate control, constructed in 1995, and exhausting to stack 5552-1; [326 IAC 6.5-1-2]

(p) One (1) Product Transfer Hopper, identified as unit 5552-2, with a maximum air throughput of 350 dscfm, using a baghouse* for control, constructed in 1995, and exhausting to stack 5552-2; [326 IAC 6.5-1-2]

- (4) The source also requested to update the Compliance Monitoring Requirements for the baghouses that control emission units 5549-20, 5549-21 and for the baghouse that controls emission units 5503-2, 5503-3 5503-4 and 5503-5. The source requested to update the normal range of the pressure drop across these baghouses to 0.5 to 7.0 inches of water instead of 1.0 to 8.0 inches of water.

“Integral Part of the Process” Determination

- (a) Pursuant to the permit application for a modification (No. 097-29534-00042) to Part 70 Operating Permit Renewal No: T097-26765-00042, issued April 16, 2010, the applicant has submitted the following justification such that the baghouse used in conjunction with emission unit TF41819, one (1) blending bin, be considered as an integral part of the milling of wet corn and be considered inherent to the process for CAM applicability.

This baghouse is necessary for the proper or safe functioning of the process. The baghouse used in conjunction with emission unit TF 41819 Starch Blending Bin, primarily serves as air/product separator for pneumatically conveyed dry starch and during the pneumatic blending process. The majority of the loading to the emission unit does not follow a separator cyclone. Therefore, this process cannot function without its respective baghouse returning product to the process. Additionally, starch is a saleable product at the facility and it is in National Starch's best interest to retain and sell these materials. National Starch does not operate any of these emission units in excess of what would be required by emission limitations or standards at a higher efficiency that would be required for normal operations.

IDEM, OAQ has evaluated the information submitted and agrees that the baghouse used in conjunction with emission unit TF41819 should be considered an integral part of the milling of wet corn and is inherent to the process for CAM applicability. Therefore this emission unit is not subject to Compliance Assurance Monitoring (CAM). In addition, the permitting level will be determined using the potential to emit after the baghouse used in conjunction with emission unit TF41819. Operating conditions in the proposed permit will specify that this baghouse used in conjunction with emission unit TF41819 shall operate at all times when the milling of wet corn is in operation. This determination is consistent with previous determinations regarding other air/product separators such as emission unit 71-9 that are an integral part of the process to permit Part 70 Operating Permit No: T097-7714-00042, issued April 14, 2004. This determination was made as part of this Significant Permit Modification No: T097-29534-00042.

- (b) Pursuant to Part 70 Operating Permit Renewal No: T097-26765-00042, issued April 16, 2010, the following justification was provided for the baghouse used in conjunction with emission unit TF41818 (581-2). IDEM, OAQ evaluated the justification and determined that the baghouse used in conjunction with emission unit TF41818 (581-2) is inherent to the process for CAM applicability. Therefore emission unit TF41818 (581-2) is not subject to Compliance Assurance Monitoring (CAM). Pursuant to the permit application for a modification (No. 097-29534-00042) to Part 70 Operating Permit Renewal No: T097-26765-00042, issued April 16, 2010, IDEM, OAQ evaluated the same justification such that the baghouse used in conjunction with emission unit TF41818 (581-2) be considered an integral part of the milling of wet corn.

Emission unit TF41818 (581-2) is an important part of the conveying operations because it ensures all conveyed product is recovered for commercial use. This material recovery equipment is installed and operated primarily for purposes other than compliance. This baghouse primarily serves as air/product separators for

pneumatically conveyed dry starch & feed products, returning product to the process or storage. Additionally, starch and feed products are saleable products at the facility and it is in National Starch's best interest to retain and sell these materials. National Starch does not operate any of these emission units in excess of what would be required by emission limitations or standards at a higher efficiency that would be required for normal operations.

IDEM, OAQ has evaluated the information submitted and agrees that the baghouse used in conjunction with emission unit TF41818 should be considered an integral part of the milling of wet corn. The permitting level will be determined using the potential to emit after the baghouse used in conjunction with emission unit TF41818. Operating conditions in the proposed permit will specify that this baghouse used in conjunction with emission unit TF41818 shall operate at all times when the milling of wet corn is in operation. This determination is consistent with previous determinations regarding other air/product separators such as emission unit 71-9 that are an integral part of the process to permit Part 70 Operating Permit No: T097-7714-00042, issued April 14, 2004. This determination was made as part of this Significant Permit Modification No: T097-29534-00042.

- (c) The Permittee submitted information requesting that the baghouse that operates in conjunction with emission unit TF41820 (61-21), be considered integral to the process of the milling of wet corn and be considered inherent to the process for CAM applicability. IDEM, OAQ evaluated the justification and agreed that the baghouse will be considered integral to the process and is inherent to the process for CAM applicability. Therefore this emission unit is not subject to Compliance Assurance Monitoring (CAM). This evaluation and approval was discussed in Part 70 Operating Permit Renewal No. T097-26765-00042, issued on April 16, 2010.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (in)	Flow Rate (acfm)	Temperature (°F)
Stack TF41818	One (1) Starch Cooling and Conveying System, identified as TF41818	45	24	14,000	150
Stack DC41819	One (1) Blending Bin, identified as TF41819	80	10	4,000	110
Stack TF41820	One (1) Starch Storage Silo #2 Receiver; identified as Bin TF41820	60	10	1,000	110

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount

of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

PTE Before Controls of the New Unit	
Pollutant	Potential To Emit (ton/yr)
PM	1.50
PM ₁₀	1.50
SO ₂	0.00
VOC	0.00
CO	0.00
NO _x	0.00
Total HAPs	0.00

PTE Change of the Modified Process			
Pollutant	PTE Before Modification (ton/yr)	PTE After Modification (ton/yr)	Net Difference (ton/yr)
PM	5.26	6.39	1.13
PM ₁₀	5.26	6.39	1.13
SO ₂	0.00	0.00	0.00
VOC	0.00	0.00	0.00
CO	0.00	0.00	0.00
NO _x	0.00	0.00	0.00
HAPs	0.00	0.00	0.00

Total PTE Change due to the Modification			
Pollutant	PTE New Emission Units (ton/yr)	Net Increase to PTE of Modified Emission Units (ton/yr)	Total PTE for New and Modified Units (ton/yr)
PM	1.50	1.13	2.63
PM ₁₀	1.50	1.13	2.63
SO ₂	0.00	0.00	0.00
VOC	0.00	0.00	0.00
CO	0.00	0.00	0.00
NO _x	0.00	0.00	0.00
HAPs	0.00	0.00	0.00

The increase in the potential to emit PM and PM₁₀ associated with this modification would be greater than five (5) tons per year, however these units have integral control devices. Therefore, the PTE Change due to the modification of PM and PM₁₀ is less than five (5) tons per year each as described in 326 IAC 2-1.1-3(e)(1)(A). This modification is not subject to the source modification requirements under 326 IAC 2-7-10.5 because the modification has the potential to emit less than five (5) tons per year of either particulate matter (PM) or particulate matter with an aerodynamic diameter less than ten (10) micrometers (PM₁₀) and is exempt under 326 IAC 2-1.1-3(e)(1)(A). The modification will be incorporated into the Part 70 Operating Permit Renewal

through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because the modification requires a case-by-case determination of an emission limitation and significant changes in existing monitoring, Part 70 permit terms, or conditions.

Permit Level Determination – PSD and Nonattainment NSR

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit modification, 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 (ton/yr)						
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO
TF41818	17.39	10.42	6.96	-	-	-	-
TF41819	4.91	2.93	1.97	-	-	-	-
TF41920	2.41	1.45	0.96	-	-	-	-
Total for Modification	24.71	14.80	9.89	-	-	-	-
PSD Significant Level	25	15	N/A	40	40	40	40
Nonattainment NSR Significant Level	N/A	N/A	10	40	N/A	N/A	N/A

Since this source is considered a major PSD source and the unrestricted potential to emit of this modification is greater than twenty-five (25) tons of PM per year, fifteen (15) tons of PM₁₀ per year, and ten (10) tons of PM_{2.5} per year, this source has elected to limit the potential to emit of this modification as follows:

In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the PM, PM₁₀ and PM_{2.5} emissions from stacks TF41818, DC41819, and TF41820 shall be less than the emission limits listed in the table below:

Equipment Description	Stack ID	PM Emission Limit (lb/hr)	PM ₁₀ Emission Limit (lb/hr)	PM _{2.5} Emission Limit (lb/hr)
One (1) Starch Cooling and Conveying System	stack TF41818	3.97	2.38	1.59
One (1) Blending Bin	stack DC41819	1.12	0.67	0.45
One (1) Starch Storage Silo #2 Receiver	stack TF41820	0.55	0.33	0.22

Compliance with these emission limits will ensure that the potential to emit is less than twenty-five (25) tons of PM per year, less than fifteen (15) tons of PM₁₀ per year, and less than ten (10) tons of PM_{2.5} per year; and therefore will render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

Federal Rule Applicability Determination

NSPS:

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

NESHAP:

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.
- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each new or modified pollutant-specific emission unit that meets the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The control devices are considered inherent to the process for CAM applicability for the existing units TF41818 and TF41820. In addition, the control device is considered inherent to the process for CAM applicability for the new unit TF41819. See the technical support document (tsd) of permit T097-26765-00042, issued on April 16, 2010 for additional details regarding integral and inherent units at National Starch LLC. See the technical support document page 4 for additional details for the new unit.

Inherent process equipment is equipment that is necessary for the proper or safe functioning of the process, or material recovery equipment that the owner/operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations. Inherent process equipment is not equipment that must be operated at higher efficiency than normal operations in order to comply with an applicable requirement. Control devices are defined as equipment, other than inherent process equipment, that is used to destroy or remove air pollutants prior to discharge to the atmosphere. Therefore, inherent process equipment is not subject to Compliance Assurance Monitoring (CAM).

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the units as part of this permit modification.

State Rule Applicability Determination

326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment New Source Review)

Since this source is considered a major PSD source and the unrestricted potential to emit of this modification is greater than twenty-five (25) tons of PM per year, fifteen (15) tons of PM₁₀ per year, and ten (10) tons of PM_{2.5} per year, this source has elected to limit the potential to emit of this modification as follows:

In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the PM, PM₁₀ and PM_{2.5} emissions from stacks TF41818, DC41819, and TF41820 shall be less than the emission limits listed in the table below:

Equipment Description	Stack ID	PM Emission Limit (lb/hr)	PM ₁₀ Emission Limit (lb/hr)	PM _{2.5} Emission Limit (lb/hr)
One (1) Starch Cooling and Conveying System	stack TF41818	3.97	2.38	1.59
One (1) Blending Bin	stack DC41819	1.12	0.67	0.45
One (1) Starch Storage Silo #2 Receiver	stack TF41820	0.55	0.33	0.22

Compliance with these emission limits will ensure that the potential to emit from this modification is less than twenty-five (25) tons of PM per year, less than fifteen (15) tons of PM₁₀ per year, and less than ten (10) tons of PM_{2.5} per year; and therefore will render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from facilities TF41818, TF41819, and TF41820 shall each not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

The Compliance Determination Requirements applicable to this modification are as follows:

1. Particulate Matter Control

- (a) In order to comply with Conditions D.2.1, D.2.2, and D.2.3, the respective baghouses for particulate control, including those integral to the process, shall be in operation and control particulate emissions from the respective facilities listed in this section at all times those facilities are in operation.
- (b) In order to comply with Conditions D.3.1, D.3.2, and D.3.3, the baghouses for particulate control, including those integral to the process, shall be in operation and control particulate emissions from all facilities listed in this section at all times those respective facilities are in operation.

These monitoring conditions are necessary because the control devices must operate to ensure compliance with 326 IAC 6.5 (Particulate Emission Limitations Except Lake County), and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

The Compliance Monitoring Requirements applicable to this modification are as follows:

2.

- (a) The compliance monitoring requirements applicable to the baghouses that control emission units 5549-20, 5549-21 and the baghouse that controls emission units 5503-2, 5503-3 and 5503-4 are as follows:

Emission Unit	Parameter	Frequency	Range	Excursions and Exceedances
5503-2 through 5503-4, 5549-20, and 5549-21	Visible Emissions	Daily	Normal-Abnormal	Response Steps
5503-2 through 5503-4, 5549-20 and 5549-21	Water Pressure Drop	Daily	0.5 to 7.0 inches	Response Steps

(b) The compliance monitoring requirements applicable to the baghouses that control emission units TF41818, TF41819, and TF41820 are as follows:

Emission Unit	Parameter	Frequency	Range	Excursions and Exceedances
TF41818, TF41819, and TF41820	Visible Emissions	Daily	Normal-Abnormal	Response Steps
TF41818, TF41819, and TF41820	Water Pressure Drop	Daily	1 to 8 inches	Response Steps

These monitoring conditions are necessary because the control devices must operate to ensure compliance with 326 IAC 6.5 (Particulate Emission Limitations Except Lake County), and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

In addition, the monitoring conditions for emission units 5503-2 through 5503-5, 5549-20, and 5549-21 will ensure compliance with 40 CFR 64.2, Compliance Assurance Monitoring (CAM).

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit Renewal No. T097-26765-00042, issued on April 16, 2010. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

1. The emission unit descriptions of units 5552-1 and 5552-2 have been revised in Sections A.2 and D.2.
 - (o) One (1) ~~Chilsonator~~ **Feed Storage Hopper**, identified as unit 5552-1, with a maximum air throughput of ~~350-2,450~~ dscfm, using a baghouse* for particulate control, constructed in 1995, and exhausting to stack 5552-1; [326 IAC 6.5-1-2]
 - (p) One (1) ~~Chilsonator~~ **Product Transfer Hopper**, identified as unit 5552-2, with a maximum air throughput of ~~2,450~~ **350** dscfm, using a baghouse* for control, constructed in 1995, and exhausting to stack 5552-2; [326 IAC 6.5-1-2]
2. The emission unit descriptions of units TF41818, TF41819 and TF41820 have been revised in Sections A.2 and D.3.

...

 - (tt) Starch operations, starch drying, starch handling and starch packaging consisting of the

following units:

- (35) One (1) Starch Storage Silo #2 Receiver; identified as **Bin TF41820 (formerly unit 61-21)**, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed in 1976, ~~and modified in 1981~~, **approved in 2010 for additional modification**, and exhausting to stack **TF41820 39**; [326 IAC 6.5-1-2]
- (67) One (1) ~~CATO~~ **Starch Cooling and Conveying System**, identified as **TF41818 (formerly unit 581-2)**, with a maximum air throughput of ~~44,000~~ **14,000** dscfm, using a baghouse** for particulate control, constructed in 1983, **approved in 2010 for modification**, and exhausting to stack **TF41818 94**; [326 IAC 6.5-1-2]
- ...
- (84) **One (1) Blending Bin, identified as TF41819, with a maximum air throughput of 4,000 dscfm, using a baghouse* for particulate control, approved in 2010 for construction, and exhausting to stack DC41819 [326 IAC 6.5-1-2]**

3. The compliance monitoring requirements applicable to the baghouses that control emission units 5549-20, 5549-21 and 5502-3, and the baghouse that controls emission units 5503-2, 5503-3 and 5503-4 have been revised. The changes to Condition D.2.7 are as follows:

D.2.7 Parametric Monitoring for Baghouses

- (a) The Permittee shall record the pressure drop across the baghouses used in conjunction with units 56-1, 71-7, 577-2, ~~5502-3, 5503-3, 5503-4, 5503-6, and 5549-13, 5549-20, and 5549-21~~ at least once per day when units 56-1, 71-7, 577-2, ~~5502-3, 5503-3, 5503-4, 5503-6, and 5549-13, 5549-20, and 5549-21~~ are in operation. When, for any one reading, the pressure drop across the baghouses are outside the normal range of 1.0 to 8.0 inches of water or a range established during the last 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 Permittee shall record the pressure drop across the baghouses used in conjunction with units 5503-2, 5503-3, 5503-4, 5549-20, and 5549-21 at least once per day when units 5503-2, 5503-3, 5503-4, 5549-20, and 5549-21 are in operation. When, for any one reading, the pressure drop across the baghouses are outside the normal range of 0.5 to 7.0 inches of water or a range established during the last 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.**
- (bc) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with units ~~5503-22-3~~, and 42-10 at least once per day when units ~~5503-22-3~~, and 42-10 are in operation. When, for any one reading, the pressure drop across the baghouses are outside the normal range of 1.0 to 8.0 inches of water or a range established during the last 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.

(ed) 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, maintained, and operated according to the Preventive Maintenance Plan.

4. The requirements for emission units TF41818, TF41819 and TF41820 have been added into Section D.3. The changes to Section D.3 are as follows:

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

D.3.1 PSD and Nonattainment NSR Minor Limits [326 IAC 2-2] [326 IAC 2-1.1-5]

In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the PM, PM10 and PM2.5 emissions from stacks TF41818, DC41819, and TF41820 shall be less than the emission limits listed in the table below:

Equipment Description	Stack ID	PM Emission Limit (lb/hr)	PM10 Emission Limit (lb/hr)	PM2.5 Emission Limit (lb/hr)
One (1) Starch Cooling and Conveying System	stack TF41818	3.97	2.38	1.59
One (1) Blending Bin	stack DC41819	1.12	0.67	0.45
One (1) Starch Storage Silo #2 Receiver	stack TF41820	0.55	0.33	0.22

Compliance with the above limits will ensure that the potential to emit from this modification is less than twenty-five (25) tons of PM per year, less than fifteen (15) tons of PM₁₀ per year, and less than ten (10) tons of PM_{2.5} per year; and therefore will render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

D.3.42 Particulate Matter [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, the particulate matter emissions from units 40-1, 42-6, 42-9, 42-11, 42-12, 61-1, 61-2, 61-3, 61-7, 61-11, 61-12, 61-13, 61-15, 61-16, 61-18 through **61-20** ~~61-21~~, 61-22, 61-23, 61-24 through 61-26, 63-1A, 63-4, 63-5, 63-6, 63-9, 63-12, 63-15, 63-16, 63-17, 63-18, 63-20, 71-3, 71-4A, 71-8, 128-3, 152-1 through 152-11, 577-1, 577-3, 577-4, 577-4A, 578-1, 578-2, 578-3, ~~581-2~~, 5549-22, DC-31900, FA-60582, SH31913, TF31901, TF31902, TR31912, TF31991, and T-1, **TF41818, TF41819 and TF41820** shall each not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

D.3.23 Particulate Matter [326 IAC 6.5-6-25]

...

D.3.34 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for units 40-1, 42-1, 42-3A through 42-3F, 42-4, 42-6, 42-7A, 42-7B, 42-7C, 42-8A through 42-8D, 42-9, 42-11, 42-12, 56-2, 61-1, 61-2, 61-3, 61-6, 61-7, 61-9, 61-11, 61-12, 61-13, 61-14, 61-14A, 61-15, 61-16, 61-18 through **61-20** ~~61-21~~, 61-22, 61-23, 61-24 through 61-26, 63-1A, 63-4, 63-5, 63-6, 63-9, 63-12, 63-15, 63-16, 63-17, 63-18, 63-20, 71-2, 71-3, 71-4A, 71-5A through 71-5L, 71-8, 128-3, 152-1 through 152-11, 577-1, 577-3, 577-4, 577-4A, 578-1, 578-2, 578-3, ~~581-2~~, 5549-22, DC-31900, FA-60582, SH31913, TF31901, TF31902, TR31912, TF31991, and T-1, **TF41818, TF41819 and TF41820**, and their respective control devices. Section B - Preventive

Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

D.3.45 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the process heater, identified as YX31914A, shall each be limited to 0.71 pound per MMBtu heat input, which was calculated using the following equation:

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

D.3.56 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

...

D.3.67 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

...

Compliance Determination Requirements

D.3.78 Particulate Control

In order to comply with Conditions D.3.1, ~~and~~ D.3.2, **and D.3.3**, the baghouses for particulate control, including those integral to the process, shall be in operation and control particulate emissions from all facilities listed in this section at all times those respective facilities are in operation.

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

D.3.9 Visible Emissions Notations

- (a) Visible emission notations of the exhaust from stacks TF41818, DC41819, and TF41820 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.**
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.**
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.**
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.**
- (e) 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 the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.**

D.3.10 Parametric Monitoring for Baghouses

- (a) The Permittee shall record the pressure drop across the baghouses used in conjunction with units TF41818, TF41819, and TF41820 at least once per day when units TF41818, TF41819, and TF41820 are in operation. When, for any one reading, the pressure drop across the baghouses are outside the normal range of 1.0 to 8.0 inches of water or a range established during the last 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, maintained, and operated according to the Preventive Maintenance Plan.

D.3.11 Broken or Failed Bag Detection

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

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

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

D.3.12 Record Keeping Requirements

- (a) To document the compliance status with Condition D.3.9, the Permittee shall maintain a daily record of visible emission notations of the exhaust from stacks TF41818, DC41819, and TF41820. 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.3.10, the Permittee shall maintain a daily record of the pressure drop across the baghouses used in conjunction with units TF41818, TF41819, and TF41820. 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) Section C - General Record Keeping Requirements of this permit contains

the Permittee's obligations with regard to the records required by this condition.

5. The 326 IAC 2-2 Prevention of Significant Deterioration (PSD) requirements in Condition D.2.1 have been clarified as follows to correct an inadvertent typographical error:

D.2.1 Prevention of Significant Deterioration [326 IAC 2-2]

...

- (b) The combined input of corn grind to units 5502-1A (Section D.1), 5502-1B (Section D.1), 5502-1D (Section D.1), 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2, 5503-3, 5503-4, 5503-5, and 5503-6 shall not exceed 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit and the limits set in D.1.1(a) and D.2.1(a) limits PM/PM10 emissions to less than or equal to 43.862 tons per year and will render the requirements of 326 IAC 2-2 not applicable.

Conclusion and Recommendation

The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 097-29534-00042. The staff recommend to the Commissioner that this Part 70 Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Sarah Conner, Ph. D. at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) (234-6555) or toll free at 1-800-451-6027 extension (4-6555).
- (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: PTE Calculations
Particulate Emissions**

Company Name: National Starch LLC
Address City IN Zip: 1515 South Drover Street, Indianapolis, IN 46221
Operating Permit Number: T097-26765-00042
Significant Permit Modification: 097-29534-00042
Reviewer: Sarah Conner, Ph. D.
Date: 8/27/2010

	Unit Number	Equipment Description	¹ Gas or Air flow rate (dscfm)	Control Equipment	Control Efficiency of Control Equipment	PM/PM10/PM2.5 Actual (gr/dscf)	PM/PM10/PM2.5 Controlled (lb/hr)	*PM/PM10/PM2.5 Controlled (tons/yr)	**PM/PM10/PM2.5 Uncontrolled PTE (tons/year)
PTE before modification									
	TF41820 (formerly 61-21)	Starch Storage Silo #2 Receive	1,000	Baghouse	99.0%	² 0.03	0.26	1.13	112.63
	TF41818 (formerly 581-2)	CATO cooling and conveying	11,000	Baghouse	99.0%	² 0.01	0.94	4.13	412.97
	Total							5.26	525.60
PTE after modification									
	TF41820 (formerly 61-21)	Starch Storage Silo #2 Receive	1,000	Baghouse	99.0%	² 0.03	0.26	1.13	112.63
	TF41818 (formerly 581-2)	CATO cooling and conveying	14,000	Baghouse	99.0%	² 0.01	1.20	5.26	525.60
NEW	TF41819	Blending Bin	4000	Baghouse	99.0%	³ 0.01	0.34	1.50	150.17
	Total							7.88	788.40
Net Increase in PTE due to modification								2.63	262.80

*The control devices are considered both integral to the process and inherent to the process for CAM applicability for the existing units TF41818 and TF41820. Inherent process equipment is not subject to Compliance Assurance Monitoring (CAM). See the technical support document (tsd) of permit T097-26765-00042, issued on April 16, 2010 for additional details regarding integral and inherent units at National Starch, LLC. IDEM, OAQ evaluated information previously submitted for existing unit TF41818 to consider the unit as integral to the process for this modification since it was only considered for inherent to the process as part of the renewal. The applicant submitted justification such that the baghouse used in conjunction with emission unit TF41819, one (1) blending bin, be considered as an integral part of the milling of wet corn. IDEM, OAQ has evaluated the information submitted and agrees that the baghouses used in conjunction with emission units TF41818 and TF41819 should be considered an integral part of the milling of wet corn. See the technical support document pages 4 and 5 for additional details.

** Since the control devices have been determined to be integral to the process, the controlled PTE is used for determining the Part 70 permitting level.

Assume that PM = PM10 = PM2.5

Methodology:

Note 1: Flow rates provided by source for permit renewal.

Note 2: For unit TF41820, the 0.03 gr/dscf is based on the 326 IAC 6.5 limit. For TF41818, the 0.01 gr/dscf is based on stack test results of similar units at the source.

Note 3: For TF41819, the the 0.01 gr/dscf is based on performance guarantee from the vendor.

Emission Rate in lbs/hr (after control) = (grains/cub. ft.) * (cub. ft./min.) * (60 min/hr) * (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) * (8760 hr/yr) * (ton/2000 lb)

Emission Rate in tons/yr (before control) = Emission Rate ((after control (tons/yr)) / (1-control efficiency)

If control efficiency is unknown, 99% percent control was assumed to calculate the maximum uncontrolled emissions.

In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the PM, PM10 and PM2.5 emissions from stacks TF41818, DC41819, and TF41820 shall be less than the emission limits listed in the table below:

Equipment Description	Stack ID	PM Emission Limit (lb/hr)	PM10 Emission Limit (lb/hr)	PM2.5 Emission Limit (lb/hr)	PM Emission Limit (tons/yr)	PM10 Emission Limit (tons/yr)	PM2.5 Emission Limit (tons/yr)
One (1) Starch Cooling and Conveying System	stack TF41818	3.97	2.38	1.59	17.39	10.42	6.96
One (1) Blending Bin	stack DC41819	1.12	0.67	0.45	4.91	2.93	1.97
One (1) Starch Storage Silo #2 Receiver	stack TF41820	0.55	0.33	0.22	2.41	1.45	0.96
Total Limited for Modification					24.70	14.80	9.90



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: Denise Curtis
National Starch LLC
1515 S Drover St
Indianapolis, IN 46221

DATE: November 22, 2010

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

SUBJECT: Final Decision
Title V
097-29534-00042

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:
Ronald J. McCrimmond, Responsible Official
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

November 22, 2010

TO: Indianapolis Marion County Public Library

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

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

Applicant Name: National Starch, LLC
Permit Number: 097-29534-00042

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	DPABST 11/22/2010 National Starch LLC 097-29534-00042 (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	Handling 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		Denise Curtis National Starch LLC 1515 S Drover St Indianapolis IN 46221 (Source CAATS) (CONFIRM DELIVERY)									
2		Ronald J McCrimmond Sr Dir Mfg National Starch LLC 1515 S Drover St Indianapolis IN 46221 (RO CAATS)									
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)									
4		Indianapolis Marion Co Public (Main) 2450 N Meridian St Indianapolis IN 46206-0211 (Library)									
5		Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 (Affected Party)									
6		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)									
7		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)									
8		Ms. Jodi Perras Improving Kids Environment 1111 East 54th Street, Suite 212 Indianapolis IN 46220 (Affected Party)									
9		Matt Mosier Office of Sustainability 2700 South Belmont Ave. Administration Bldg. Indianapolis IN 46221 (Local Official)									
10		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)									
11											
12											
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