



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: March 15, 2012

RE: Heartland Sweeteners, LLC / 097-31181-00685

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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

**Heartland Sweeteners, LLC
4635 West 84th Street and 8460 Bearing Drive
Indianapolis, Indiana 46268**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions

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

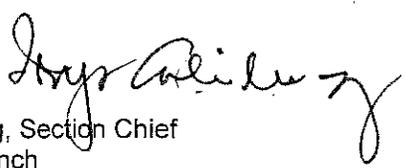
Operation Permit No.: F097-31181-00685	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 15, 2012 Expiration Date: March 15, 2017

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary dry food-grade manufacturing plant.

Source Address(es):	4635 West 84th Street, Indianapolis, Indiana 46268; and 8460 Bearing Drive, Indianapolis, Indiana 46268
General Source Phone Number:	(317) 876-7121
SIC Code:	2099
County Location:	Marion
Source Location Status:	Nonattainment for PM _{2.5} standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

This source consists of one (1) manufacturing plant and one (1) distribution plant:

- (a) Heartland Sweeteners, LLC's Manufacturing Plant is located at 4635 West 84th Street, Indianapolis, IN 46268; and
- (b) Heartland Sweeteners, LLC's Distribution Center is located at 8460 Bearing Drive, Indianapolis, IN 46268.

Since the two (2) plants are located on contiguous or adjacent properties, have a supporting relationship, and are under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this New Source Construction and FESOP.

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

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

- (a) One (1) packaging room, identified as Packaging Room 1, constructed in 2008, with a maximum capacity of 4,190 lbs/hr, utilizing dust collector DC1 as particulate control, exhausting to stack S-1, and consisting of:
 - (1) Five (5) packaging machines.
- (b) One (1) mixing room, identified as Mixing Room 1, constructed in 2010, with a maximum capacity of 4,190 lbs/hr, utilizing dust collector DC2 as particulate control, exhausting to stack S-2, and consisting of:
 - (1) Mixing stations; and
 - (2) Repacking stations.

- (c) One (1) spray dryer, identified as Spray Dryer 1, approved for construction in 2012, with a maximum production capacity of 1,800 lbs dry food-grade sweetener per hour, equipped with a 4.6 MMBtu/hr natural gas-fired heater, utilizing a material recovery dust collector (DC3), and exhausting to stack S-3.

A.4 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
 - (1) Nine (9) natural gas-fired space heaters, each with a heat input capacity of 0.39 MMBtu/hr or less, located at the manufacturing facility.
 - (2) Four (4) natural gas-fired space heaters, each with a heat input capacity of 0.39 MMBtu/hr or less, located at the distribution facility.
- (b) Water-based activities, including the following:
 - (1) Any operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAPs.
- (c) Paved roadways and parking lots with public access

A.5 FESOP Applicability [326 IAC 2-8-2]

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

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

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

-
- (a) This permit, F097-31181-00685, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
 - (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

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

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

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

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

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

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

- (a) All terms and conditions of permits established prior to F097-31181-00685 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

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

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

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

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

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

- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

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

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

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit [326 IAC 2-8]

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

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
 - (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

The Permittee shall not operate an incinerator 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.5 Fugitive Dust Emissions [326 IAC 6-4]

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

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

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

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

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

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

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application.

Support information includes the following:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

Stratospheric Ozone Protection

C.17 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) packaging room, identified as Packaging Room 1, constructed in 2008, with a maximum capacity of 4,190 lbs/hr, utilizing dust collector DC1 as particulate control, exhausting to stack S-1, and consisting of:
 - (1) Five (5) packaging machines.
- (b) One (1) mixing room, identified as Mixing Room 1, constructed in 2010, with a maximum capacity of 4,190 lbs/hr, utilizing dust collector DC2 as particulate control, exhausting to stack S-2, and consisting of:
 - (1) Mixing stations; and
 - (2) Repacking stations.
- (c) One (1) spray dryer, identified as Spray Dryer 1, approved for construction in 2012, with a maximum production capacity of 1,800 lbs dry food-grade sweetener per hour, equipped with a 4.6 MMBtu/hr natural gas-fired heater, utilizing a material recovery dust collector (DC3), and exhausting to stack S-3.

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

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

D.1.1 FESOP and Nonattainment Limits [326 IAC 2-8-4][326 IAC 2-2][326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable, PM10 and PM2.5 emissions from the following units shall not exceed the emission limits listed in the table below:

Process Description	Control ID	Stack ID	PM10 Emission Limit (lbs/hr)	PM2.5 Emission Limit (lbs/hr)
Mixing Room 1	DC2	S-2	6.43	6.43
Spray Dryer 1	DC3	S-3	NA	3.18

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable.

D.1.2 Particulate Matter Limitations [326 IAC 6.5-1-2(a)]

- (a) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the Packaging Room 1 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)), each.
- (b) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the Mixing Room 1 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

- (c) Pursuant to 326 IAC 6.5-1-2(a), the process particulate matter emissions from Spray Dryer 1 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

D.1.3 Preventive Maintenance Plan [326 2-8-4(9)]

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

Compliance Determination Requirements

D.1.4 Particulate Control

In order to comply with Conditions D.1.1, D.1.2, and D.1.3, each of the following emission units shall be controlled by the associated control device, as listed in the table below, when these units are in operation:

Process Description	Control ID	Stack ID
Packaging Room 1	DC1	S-1
Mixing Room 1	DC2	S-2
Spray Dryer 1	DC3	S-3

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

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the S-1, S-2, and S-3 stack exhausts 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.1.6 Baghouse Parametric Monitoring

The Permittee shall record the pressure drops across DC1, DC2, and DC3, at least once per day when the Packaging Room 1, Mixing Room 1, and/or Spray Dryer 1, are in operation. When for any one reading, the pressure drop across the baghouses is outside the normal range of 4.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take a reasonable response. Section C – Response to Excursions and 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.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.1.7 Broken or Failed Bag Detection

- (a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the 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's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.1.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain a daily record of visible emission notations of the S-1, S-2, and S-3 stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (i.e., the process did not operate that day).
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain daily records of the pressure drops across the baghouses (DC1, DC2, and DC3) controlling the Packaging Room 1, Mixing Room 1, and Spray Dryer 1. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the recordkeeping requirements of this requirement.

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

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

Source Name: Heartland Sweeteners, LLC
Source Address: 4635 West 84th Street, Indianapolis, Indiana 46268
FESOP Permit No.: F097-31181-00685

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Heartland Sweeteners, LLC
Source Address: 4635 West 84th Street, Indianapolis, Indiana 46268
FESOP Permit No.: F097-31181-00685

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Source Name: Heartland Sweeteners, LLC
Source Address: 4635 West 84th Street, Indianapolis, Indiana 46268
FESOP Permit No.: F097-31181-00685

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. 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: _____

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

Heartland Sweeteners, LLC
4635 West 84th Street
Indianapolis, Indiana 46268

Affidavit of Construction for Packaging Room 1 & Mixing Room 1

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Heartland Sweeteners, LLC, 4635 West 84th Street, Indianapolis, Indiana 46268, has constructed and will operate the Packaging Room 1 and Mixing Room 1 in conformity with the requirements and intent of the permit application received by the Office of Air Quality on November 23, 2011 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F097-31181-00685, Plant ID No. 097-00685 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

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

Signature _____
Name _____ (typed or printed)

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

Heartland Sweeteners, LLC
4635 West 84th Street
Indianapolis, Indiana 46268

Affidavit of Construction for Spray Dryer 1

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____
(Company Name)
4. I hereby certify that Heartland Sweeteners, LLC 4635 West 84th Street, Indianapolis, Indiana 46268, completed construction of the Spray Dryer 1 on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on November 23, 2011 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F097-31181-00685, Plant ID No. 097-00685 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

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

Signature _____
Name _____ (typed or printed)

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

Addendum to the Technical Support Document (ATSD) for a
New Source Construction and
Federally Enforceable State Operating Permit (FESOP)

Source Background and Description
--

Source Name:	Heartland Sweeteners, LLC
Source Location:	4635 West 84th Street, Indianapolis, IN 46268 and 8460 Bearing Drive, Indianapolis, IN 46268
County:	Marion
SIC Code:	2099 (Food Preparations, Not Elsewhere Classified)
Operation Permit No.:	F 097-31181-00685
Permit Reviewer:	Jason R. Krawczyk

On February 9, 2012, the Office of Air Quality (OAQ) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Heartland Sweeteners, LLC had applied for a New Source Construction and FESOP to construct and operate a new stationary dry food-grade manufacturing plant. The notice also stated that the OAQ proposed to issue a New Source Construction and FESOP for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On February 23, 2012, Robert O'Brien, submitted comments to IDEM, OAQ on the draft FESOP.

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

Comment 1:

Is there a requested deviation or waiver being requested concerning the current commercial zoning as it relates to air pollutants?

Response to Comment 1:

IDEM is not aware of waiver request from the applicant regarding land zoning. In addition, IDEM does not have legal authority to regulate zoning and therefore has no knowledge regarding zoning requests. For issues related to zoning, citizens should contact their local government officials. Zoning has no effect in relation to allowable emission thresholds under State and/or Federal environmental regulations.

No changes were made as a result of this comment.

Comment 2:

It is my opinion that no equipment (unpermitted) should be allowed to operate either in the past or future without proper certificate of compliance as it relates to operations. I believe the IDEM should not rely on the applicant to make any running changes and those operations should cease until such time as all

concerns and testing have been completed by IDEM.

Response to Comment 2:

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. The proposed approval is intended to satisfy the requirements of the construction permit rules.

Regarding testing, the current draft permit does not contain any testing requirements for the facility.

No changes were made as a result of this comment.

Comment 3:

As to Title V and/or PSD Major Source thresholds, I and the community must rely on your expert recommendations as to what is deemed safe for the environment. If however we are speaking to long-term exposure to toxic air pollutants and how it relates to upper respiratory effects, I have an immediate concern. I am also not too inclined to favor any unwarranted acute effects such as eye irritation, headaches, and nausea.

Response to Comment 3:

The facility's potential emissions will not violate any Primary National Ambient Air Quality Standards (NAAQS) which are protective of public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly, nor will the potential emissions violate any Secondary NAAQS standards, which are protective of public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings.

The Office of Air Quality issues air pollution control permits to facilities that emit regulated levels of pollutants to the air. Permits require sources to comply with all health-based and technology-based standards established by the U.S. EPA and the Indiana Air Pollution Control Board. If an applicant demonstrates that they will be able to comply with all Federal and State laws regarding air pollution, IDEM is required by law to issue the air permit. For information on how to get involved in Indiana's Environmental Rulemaking Process, please go to <http://www.in.gov/idem/rules/involved.html>.

No changes were made as a result of this comment.

Comment 4:

During our discussion with Heartland Sweeteners, LLC (Heartland), the community was assured by Heartland, that particulates would be captured internal to the operations and that there would be no external emission of odor, particles, dust and the like.

Response to Comment 4:

IDEM recognizes that quality of life issues such as odors are very important. IDEM does not have legal authority to regulate odor; therefore, IDEM does not have the authority to issue or deny a permit based on these concerns. For issues related to odor, citizens should contact their local government officials.

The facility has the potential to emit particulate matter (PM), particulate matter less than 10 micrograms (PM10), particulate matter less than two and one half micrograms (PM2.5), sulfur dioxide (SO2), nitrogen oxides (NOx), volatile organic compounds (VOC), carbon monoxide (CO), greenhouse gasses as carbon dioxide equivalents (GHGs as CO2e), and hazardous air pollutants (HAPs) to the ambient, at levels that will not violate any NAAQS.

The facility is responsible for ensuring fugitive dust does not escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located. If fugitive dust is visible crossing the boundary or property line of a source any person may report the violation to the facility inspector Martin Yeates at (317) 234-1300.

Complaints can also be submitted to IDEM three (3) different ways:

1. Online at: <http://www.in.gov/idem/5275.htm>;
2. Through the Complaint Coordinator at (800) 451-6027 ext. 24464; or
3. By printing, completing, and mailing a paper-based Complaint Submission Form (Available under Agency Forms at: <http://www.in.gov/idem/5157.htm>)

No changes were made as a result of this comment.

Comment 5:

I am not sure why a public meeting or hearing would ever be considered. We (the community) are relying on the IDEM as gate keepers to ensure our well being and health. If you have any concerns regarding this operation by Heartland Sweeteners, LLC, then you should be fighting this battle on our behalf.

Response to Comment 5:

Public meetings and/or hearings may be requested by the public, to give citizens an opportunity to ask questions, make statements, and discuss air pollution concerns with IDEM staff.

The Office of Air Quality issues air pollution control permits to facilities that emit regulated levels of pollutants to the air. Permits require sources to comply with all health-based and technology-based standards established by the U.S. EPA and the Indiana Air Pollution Control Board. If an applicant demonstrates that they will be able to comply with all Federal and State laws regarding air pollution, IDEM is required by law to issue the air permit. For information on how to get involved in Indiana's Environmental Rulemaking Process, please go to <http://www.in.gov/idem/rules/involved.html>.

No changes were made as a result of this comment.

Additional Changes

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

- (a) On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions. The change is only to site of these rules in Section B - Operational Flexibility. IDEM, OAQ has clarified the rule sites for the Preventive Maintenance Plan.

...

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

...

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

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

following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15 ~~(b)(2), (c)(1), and (d)~~ **(b)(1) and (c)**. The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15 ~~(b)(2), (c)(1), and (d)~~ **(b)(1) and (c)**.

- (b) Emission Trades [326 IAC 2-8-15 ~~(e)~~ **(b)**]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15 ~~(e)~~ **(b)**.
- (c) Alternative Operating Scenarios [326 IAC 2-8-15 ~~(d)~~ **(c)**]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

...

- (b) Condition C.15 - General Record Keeping Requirements has been revised to include further clarification regarding support information and records of all required monitoring data.

...
C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application.

Support information includes the following:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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.

...

- (c) IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.

...
C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. **Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph.** Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

...

This report shall be submitted quarterly based on a calendar year. **Proper notice submittal under**

Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. 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".

...

IDEM Contact

- (a) Questions regarding this proposed New Source Construction and FESOP can be directed to Jason R. Krawczyk 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) 234-5174 or toll free at 1-800-451-6027 extension 4-5174.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

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

Technical Support Document (TSD) for a New Source Construction and
Federally Enforceable State Operating Permit (FESOP)

Source Description and Location
--

Source Name:	Heartland Sweeteners, LLC
Source Location:	4635 West 84th Street, Indianapolis, IN 46268 and 8460 Bearing Drive, Indianapolis, IN 46268
County:	Marion
SIC Code:	2099 (Food Preparations, Not Elsewhere Classified)
Operation Permit No.:	F 097-31181-00685
Permit Reviewer:	Jason R. Krawczyk

On November 23, 2011, the Office of Air Quality (OAQ) received an application from Heartland Sweeteners, LLC related to the construction and operation of a new stationary dry food-grade manufacturing plant.

Source Definition

This source consists of the following plants:

- (a) Heartland Sweeteners, LLC's Manufacturing Plant is located at 4635 West 84th Street, Indianapolis, IN 46268; and
- (b) Heartland Sweeteners, LLC's Distribution Center is located at 8460 Bearing Drive, Indianapolis, IN 46268.

In order to consider both plants as one single source, all three of the following criteria must be met:

- (1) The plants must have common ownership/control;
- (2) The plants must have the same SIC code or one must serve as a support facility for another; and
- (3) The plants must be located on contiguous or adjacent properties.

Since the two (2) plants are located on contiguous or adjacent properties, have a supporting relationship, and are under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this New Source Construction and FESOP.

Existing Approvals

There have been no previous approvals issued to this source.

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.
¹ Attainment 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 (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{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 criteria 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.

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Heartland Sweeteners, LLC on November 23, 2011, relating to the continued operation of their existing dry food-grade manufacturing plant and the construction of a new spray dryer.

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

- (a) One (1) spray dryer, identified as Spray Dryer 1, approved for construction in 2012, with a maximum production capacity of 1,800 lbs dry food-grade sweetener per hour, equipped with a 4.6 MMBtu/hr natural gas-fired heater, utilizing a material recovery dust collector (DC3), and exhausting to stack S-3.

The following is a list of the insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
 - (1) Nine (9) natural gas-fired space heaters, each with a heat input capacity of 0.39 MMBtu/hr or less, located at the manufacturing facility.
 - (2) Four (4) natural gas-fired space heaters, each with a heat input capacity of 0.39 MMBtu/hr or less, located at the distribution facility.
- (b) Water-based activities, including the following:
 - (1) Any operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAPs.
- (c) Paved roadways and parking lots with public access

There are currently no permitted emission units operating at this source.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

- (a) One (1) packaging room, identified as Packaging Room 1, constructed in 2008, with a maximum capacity of 4,190 lbs/hr, utilizing dust collector DC1 as particulate control, exhausting to stack S-1, and consisting of:
 - (1) Five (5) packaging machines.
- (b) One (1) mixing room, identified as Mixing Room 1, constructed in 2010, with a maximum capacity of 4,190 lbs/hr, utilizing dust collector DC2 as particulate control, exhausting to stack S-2, and consisting of:
 - (1) Mixing stations; and
 - (2) Repacking stations.

“Integral Part of the Process” Determination

The applicant has submitted the following information to justify why the material recovery dust collector (DC3) should be considered an integral part of the spray dryer (Spray Dryer 1):

- (a) The spray dryer will generate two types of solid material: agglomerated product and fines. Based on the design material balance, approximately 4,551 pounds of fines are generated for every 1,800 pounds of agglomerated products. Losing approximately 75 percent of the material in the spray dryer, at approximately 0.35 \$ / lb value of the product material, would be costly. Therefore, a material recovery dust collector is used to collect the fines from the dryer outlet and circulate them back to the dryer inlet to be agglomerated with fresh dryer feed. The primary purpose of this material recovery dust collector is to circulate material back to the spray dryer.

IDEM, OAQ has evaluated the information submitted and agrees that the material recovery dust collector (DC3) should be considered an integral part of the spray dryer (Spray Dryer 1). This determination is based on the fact that the control equipment serves a primary purpose other than pollution control and has an overwhelming positive net economic benefit. Therefore, the permitting level will be determined using the potential to emit after the material recovery dust collector (DC3). Operating conditions in the proposed permit will specify that this material recovery dust collector (DC3) shall operate at all times when the spray dryer (Spray Dryer 1) is in operation.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	Less than 250, Greater than 100
PM10 ⁽¹⁾	Less than 250, Greater than 100
PM2.5	Less than 250, Greater than 100
SO ₂	Less than 25
NO _x	Less than 25
VOC	Less than 25
CO	Less than 25
GHGs as CO ₂ e	Less than 100,000

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Single HAP	Less than 10
Combined HAPs	Less than 25

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of PM10 and PM2.5 are each greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.

- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year.

PTE of the Entire Source After Issuance of the FESOP

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

Emission Unit / Control Device/ Stack ID	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)									
	PM	PM10 ^A	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e ^B	Total HAPs	Worst Single HAP
Packaging Room 1 (DC1)(S-1)	13.28	13.28	13.28	-	-	-	-	-	-	-
Packaging Room 1 Uncaptured ^D	0.70	0.70	0.70	-	-	-	-	-	-	-
Mixing Room 1 (DC2)(S-2)	28.16	28.16	28.16	-	-	-	-	-	-	-
Mixing Room 1 Uncaptured ^D	5.93	5.93	5.93	-	-	-	-	-	-	-
Spray Dryer (DC3)(S-3) ^{E, F}	0.88	0.88	13.93	-	-	-	-	-	-	-
Natural Gas Combustion	0.08	0.32	0.32	0.03	4.24	0.23	3.56	5,113	0.08	0.08 Hexane
Main Plt Paved Roads ^C	0.23	0.05	0.01	-	-	-	-	-	-	-
Distribution Plt Paved Roads ^C	0.04	0.01	Negl.	-	-	-	-	-	-	-
Total PTE of Entire Source	49.03	49.27	62.32	0.03	4.24	0.23	3.56	5,113	0.08	0.08 Hexane
Title V Major Source Thresholds ^B	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds ^B	250	250	250	250	250	250	250	100,000	NA	NA
Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA	NA

negl. = negligible

^A Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

^B The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

^C Fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

^D DC1 and DC2 each only have a 95% capture efficiency.

^E PM & PM10 emissions from the Spray Dryer 1 reflect consideration of the integral control device.

^F PM2.5 emissions from the Spray Dryer 1 are limited to 3.18 lbs/hr, in order to limit source-wide PM2.5 emissions to less than one hundred (100) tons per year and to render the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable.

(a) FESOP Status

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable, PM10 and PM2.5 emissions from the following units shall not exceed the emission limits listed in the table below:

Process Description	Control ID	Stack ID	PM10 Emission Limit (lbs/hr)	PM2.5 Emission Limit (lbs/hr)
Mixing Room 1	DC2	S-2	6.43	6.43

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable.

Note: PM10 and PM2.5 FESOP limits are not necessary for the Packaging Room 1 because the potentials to emit from the process combined with the limited potentials to emit from Mixing Room 1 and Spray Dryer 1, limit the source-wide potential to emit PM10 and PM2.5 below Title V and Nonattainment New Source Review Thresholds.

PM10 and PM2.5 FESOP limits are not necessary for the Spray Dryer 1 because the potentials to emit after consideration of the integral control device are used for 326 IAC 2-8-4 (FESOP) applicability.

(b) PSD Minor Status

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potentials to emit all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(c) Nonattainment New Source Review

This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than ten 2.5 micrometers (PM2.5), is limited to less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.

In order to render the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable, PM2.5 emissions from the Spray Dryer 1 shall not exceed the emission limit in the table below:

Process Description	Control ID	Stack ID	PM2.5 Emission Limit (lbs/hr)
Spray Dryer 1	DC3	S-3	3.18

Compliance with this limit, combined with the potential to emit PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM2.5 to less than 100 tons per twelve (12) consecutive month period, and shall render 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable.

Note: Limit determined by assuming grainloading of 0.03 gr/acf and assuming air flow rate of 12,350 acfm.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63.7480, Subpart DDDDD (326 IAC 20-95) are not included for the spray dryer, because this source is not a major source of HAPs and the spray dryer does not meet the definition of process heater, as defined in 40 CFR 63.7575.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63.11193, Subpart JJJJJ, are not included in the for the spray dryer because the spray dryer does not meet the definition of industrial, commercial, or institutional boiler, as defined by 40 CFR 63.11237.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants for Area Sources: Prepared Feeds Manufacturing, 40 CFR 63.11619, Subpart DDDDDDD are not included for the source because this source is not a prepared feeds manufacturing facility, as defined in 11627. This source is not primarily engaged in manufacturing animal feed.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 1-7 (Stack Height Provisions)
Pursuant to 326 IAC 1-7, the source shall comply with 326 IAC 1-7-3 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.
- (b) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

- (d) 326 IAC 2-1.1-5 (Nonattainment New Source Review)
Nonattainment New Source Review applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (e) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the emission units is 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.
- (f) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (g) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (h) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3), the source is not subject to the requirements of 326 IAC 6-3 since it is subject to a particulate matter limitation in 326 IAC 6.5, which is more stringent than the particulate limitation established in 326 IAC 6-3.
- (i) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (j) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because it does not have potential fugitive particulate emissions greater than 25 tons per year.
- (k) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (l) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Packaging Room

- (m) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the Packaging Room 1 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Mixing Room

- (n) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
 Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from Mixing Room 1 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Spray Dryer

- (o) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
 Pursuant to 326 IAC 6.5-1-2(a), the process particulate matter emissions from Spray Dryer 1 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).
- (p) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
 The spray dryer, identified as Spray Dryer 1, is exempt from the requirements of 326 IAC 6-2, because it is a direct fired process heater.

Natural Gas Heaters

- (p) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
 Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the thirteen (13) natural gas-fired heaters shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Compliance Determination, Monitoring and Testing Requirements

- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

Control ID	Parameter	Frequency	Range	Excursions and Exceedances
DC1	Pressure Drop	Daily	4.0 - 6.0 inches water	Response Steps
	Visible Emissions		Normal - Abnormal	
DC2	Pressure Drop	Daily	4.0 - 6.0 inches water	
	Visible Emissions		Normal - Abnormal	
DC3	Pressure Drop	Daily	4.0 - 6.0 inches water	
	Visible Emissions		Normal - Abnormal	

- (b) There are no testing requirements applicable to this source.

Testing is not being required for Mixing Room 1 or its control (DC2) because the FESOP limits are set equal to a controlled potential to emit assuming a 75% control device efficiency.

Testing is not being required for Spray Dryer 1 or its control (DC3) because the control device is considered to be integral to the process and the Nonattainment New Source Review limit is set at a multitude of 16x higher than DC3's manufacturer's guaranteed outlet concentration.

Note: There are two (2) Affidavits of Construction attached to the permit since some units have already been constructed.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on November 23, 2011.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. 097-31181-00685. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jason R. Krawczyk 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) 234-5174 or toll free at 1-800-451-6027 extension 4-5174.
- (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.in.gov/idem

SUMMARY OF EMISSIONS

Company Name: Heartland Sweeteners, LLC
Address City IN Zip: 4635 West 84th Street, Indianapolis, IN 46268
 8460 Bearing Drive, Indianapolis, IN 46268
Permit Number: 097-31181-00685
Plt ID: 097-00685
Reviewer: Jason R. Krawczyk
Date: January 30, 2012

Uncontrolled / Unlimited Emissions (Tons/Yr)								
Pollutant	Packaging Room 1 (DC-1)	Mixing Room 1 (DC-2)	Spray Dryer 1 (DC-3)	Spray Dryer Combustion	Natural Gas Heaters	Main Plt Paved Roads	Distribution Plt Paved Roads	Total
PM	13.98	118.56	0.88	0.04	0.04	0.23	0.04	133.50
PM10	13.98	118.56	0.88	0.15	0.17	0.05	0.01	133.74
PM2.5	13.98	118.56	0.88	0.15	0.17	0.01	0.00	133.74
VOC	-	-	-	0.11	0.12	-	-	0.23
NOx	-	-	-	2.01	2.22	-	-	4.24
SO2	-	-	-	0.01	0.01	-	-	0.03
CO	-	-	-	1.69	1.87	-	-	3.56
GHGs as CO2e	-	-	-	2,432	2,681	-	-	5,113
Single HAP (Hexane)	-	-	-	0.04	0.04	-	-	0.08
Combined HAPs	-	-	-	0.04	0.04	-	-	0.08

Note:

DC-3 is considered integral to the process, therefore potential to emit reflects emissions after consideration of the integral control.

Controlled / Unlimited Emissions (Tons/Yr)								
Pollutant	Packaging Room 1 (DC-1)	Mixing Room 1 (DC-2)	Spray Dryer 1 (DC-3)	Spray Dryer Combustion	Natural Gas Heaters	Main Plt Paved Roads	Distribution Plt Paved Roads	Total
PM	0.96	8.18	0.88	0.04	0.04	0.23	0.04	10.10
PM10	0.96	8.18	0.88	0.15	0.17	0.05	0.01	10.34
PM2.5	0.96	8.18	0.88	0.15	0.17	0.01	0.00	10.34
VOC	-	-	-	0.11	0.12	-	-	0.23
NOx	-	-	-	2.01	2.22	-	-	4.24
SO2	-	-	-	0.01	0.01	-	-	0.03
CO	-	-	-	1.69	1.87	-	-	3.56
GHGs as CO2e	-	-	-	2,432	2,681	-	-	5,113
Single HAP (Hexane)	-	-	-	0.04	0.04	-	-	0.08
Combined HAPs	-	-	-	0.04	0.04	-	-	0.08

Limited / Uncontrolled Emissions (Tons/Yr)								
Pollutant	Packaging Room 1 (DC-1)	Mixing Room 1 (DC-2)*	Spray Dryer 1 (DC-3)**	Spray Dryer Combustion	Natural Gas Heaters	Main Plt Paved Roads	Distribution Plt Paved Roads	Total
PM	13.98	34.09	0.88	0.04	0.04	0.23	0.04	49.03
PM10	13.98	34.09	0.88	0.15	0.17	0.05	0.01	49.27
PM2.5	13.98	34.09	13.93	0.15	0.17	0.01	0.00	62.32
VOC	-	-	-	0.11	0.12	-	-	0.23
NOx	-	-	-	2.01	2.22	-	-	4.24
SO2	-	-	-	0.01	0.01	-	-	0.03
CO	-	-	-	1.69	1.87	-	-	3.56
GHGs as CO2e	-	-	-	2,432	2,681	-	-	5,113
Single HAP (Hexane)	-	-	-	0.04	0.04	-	-	0.08
Combined HAPs	-	-	-	0.04	0.04	-	-	0.08

Note:

* Mixing Room 1 emissions reflect a 6.43 lb/hr S-2 limitation in conjunction with uncaptured emissions

**Spray Dryer 1 emissions reflect a 3.18 lb PM2.5/hr S-3 limitation to render the requirements of 326 IAC 2-1.1-5 not applicable

Appendix A: Emission Calculations
Particulate Emissions from Packaging Room (DC1)

Company Name: Heartland Sweeteners, LLC
Address City IN Zip: 4635 West 84th Street, Indianapolis, IN 46268
 8460 Bearing Drive, Indianapolis, IN 46268
Permit Number: 097-31181-00685
Plt ID: 097-00685
Reviewer: Jason R. Krawczyk
Date: January 30, 2012

Particulate Emissions

Process (Control ID)	Maximum Process Throughput (tons/hr)	PM/PM10/PM2.5 Emission Factor* (lb/ton)	Estimated Capture Efficiency (%)	Estimated Control Efficiency (%)	Uncontrolled PTE		Controlled PTE (Stack)		Uncaptured PTE (Ambient)		Total Controlled PTE (Controlled & Uncaptured)	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Packaging Room 1 (DC1)	2.10	1.52	95.00%	98.00%	3.19	13.98	0.06	0.27	0.16	0.70	0.22	0.96

Note:

*Emission factor based on site specific mass balance information with 2x safety factor.
 Assumed PM = PM10 = PM2.5

Methodology:

Uncontrolled PTE (lbs/hr) = Maximum Process Throughput (tons/hr) * Emission Factor (lb/ton)
 Uncontrolled PTE (tons/yr) = Uncontrolled PTE (lbs/hr) * 8,760 hrs * 1 ton/2,000 lbs
 Controlled PTE (Stack) (lbs/hr) = Uncontrolled PTE (lbs/hr) * Estimated Capture Efficiency * (1 - Estimated Control Efficiency)
 Controlled PTE (Stack) (tons/yr) = Controlled PTE (Stack) (lbs/hr) * 8,760 hrs * 1 ton/2,000 lbs
 Uncaptured PTE (Ambient) (lbs/hr) = Uncontrolled PTE * (1 - Estimated Capture Efficiency)
 Uncaptured PTE (Ambient) (tons/yr) = Uncaptured PTE (Ambient) (lbs/hr) * 8,760 * 1 ton/2,000 lbs
 Total Controlled PTE = Controlled PTE (Stack) + Uncaptured PTE (Ambient)

**Appendix A: Emission Calculations
Particulate Emissions from Mixing Room (DC2)**

Company Name: Heartland Sweeteners, LLC
Address City IN Zip: 4635 West 84th Street, Indianapolis, IN 46268
 8460 Bearing Drive, Indianapolis, IN 46268
Permit Number: 097-31181-00685
Plt ID: 097-00685
Reviewer: Jason R. Krawczyk
Date: January 30, 2012

Particulate Emissions

Process (Control ID)	Maximum Process Throughput (tons/hr)	PM/PM10/PM2.5 Emission Factor* (lb/ton)	Estimated Capture Efficiency (%)	Estimated Control Efficiency (%)	Uncontrolled PTE		Controlled PTE		Uncaptured PTE		Total Controlled PTE (Controlled & Uncaptured)	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Mixing Room 1 (DC2)	2.10	12.89	95.00%	98.00%	27.07	118.56	0.51	2.25	1.35	5.93	1.87	8.18

Note:

*Emission factor based on site specific mass balance information with 2x safety factor.
 Assumed PM = PM10 = PM2.5

Methodology:

Uncontrolled PTE (lbs/hr) = Maximum Process Throughput (tons/hr) * Emission Factor (lb/ton)
 Uncontrolled PTE (tons/yr) = Uncontrolled PTE (lbs/hr) * 8,760 hrs * 1 ton/2,000 lbs
 Controlled PTE (Stack) (lbs/hr) = Uncontrolled PTE (lbs/hr) * Estimated Capture Efficiency * (1 - Estimated Control Efficiency)
 Controlled PTE (Stack) (tons/yr) = Controlled PTE (Stack) (lbs/hr) * 8,760 hrs * 1 ton/2,000 lbs
 Uncaptured PTE (Ambient) (lbs/hr) = Uncontrolled PTE * (1 - Estimated Capture Efficiency)
 Uncaptured PTE (Ambient) (tons/yr) = Uncaptured PTE (Ambient) (lbs/hr) * 8,760 * 1 ton/2,000 lbs
 Total Controlled PTE = Controlled PTE (Stack) + Uncaptured PTE (Ambient)

**Appendix A: Emission Calculations
Particulate Emissions from Spray Dryer (DC3)**

Company Name: Heartland Sweeteners, LLC
Address City IN Zip: 4635 West 84th Street, Indianapolis, IN 46268
 8460 Bearing Drive, Indianapolis, IN 46268
Permit Number: 097-31181-00685
Pit ID: 097-00685
Reviewer: Jason R. Krawczyk
Date: January 30, 2012

Particulate Emissions

Baghouse ID No.	Outlet Grain Loading (gr/acf)	Air Flow Rate (acfm)	Control Efficiency (%)	Capture Efficiency (%)	PTE Before Control Consideration		PTE After Integral Control	
					(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
DC3	1.89E-03	12,350	99.00%	100.00%	20.00	87.58	0.20	0.88
Potential Emissions:						87.58		0.88

Note:

Assumed PM = PM10 = PM2.5

Methodology:

PTE Before Control Consideration (lbs/hr) = PTE After Integral Control (lbs/hr) / ((1 - Control Efficiency) * (Capture Efficiency))

PTE Before Control Consideration (tons/yr) = PTE After Integral Control (lbs/hr) * 8,760 hrs / 2,000 lbs

PTE After Integral Control (lbs/hr) = Loading (grains/acfm) * Air Flow Rate (acfm) * 1 lb/7,000 grains * 60 min/hr

PTE After Integral Control (tons/yr) = Loading (grains/acfm) * Air Flow Rate (acfm) * 1 lb/7,000 grains * 60 min/hr * 8,760 hrs / 2,000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only

Company Name: Heartland Sweeteners, LLC
Address City IN Zip: 4635 West 84th Street, Indianapolis, IN 46268
 8460 Bearing Drive, Indianapolis, IN 46268
Permit Number: 097-31181-00685
Plt ID: 097-00685
Reviewer: Jason R. Krawczyk
Date: January 30, 2012

Heat Input Capacity	Potential Throughput	Emission Unit
MMBtu/hr	MMCF/yr	Description
4.60	40.30	Spray Dryer
4.60	40.3	

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.04	0.15	0.15	0.01	2.01	0.11	1.69

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 PM2.5 emission factor is filterable and condensable PM2.5 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology:
 All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Hazardous Air Pollutant Emissions

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.231E-05	2.418E-05	1.511E-03	3.627E-02	6.850E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.007E-05	2.216E-05	2.821E-05	7.656E-06	4.231E-05

Combined HAPs: 0.04

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

Greenhouse Gas Emissions

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	2,418	0.0	0.0
Summed Potential Emissions in tons/yr	2,418		
CO2e Total in tons/yr	2,432		

Methodology:
 The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
 Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

Company Name: Heartland Sweeteners, LLC
Address City IN Zip: 4635 West 84th Street, Indianapolis, IN 46268
 8460 Bearing Drive, Indianapolis, IN 46268
Permit Number: 097-31181-00685
Plt ID: 097-00685
Reviewer: Jason R. Krawczyk
Date: January 30, 2012

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Emission Unit Description
5.07	44.41	Thirteen (13) heaters @ 0.39 MMBtu/hr, each
5.07	44.4	

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.04	0.17	0.17	0.01	2.22	0.12	1.87

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 PM2.5 emission factor is filterable and condensable PM2.5 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology:
 All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Hazardous Air Pollutant Emissions

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.663E-05	2.665E-05	1.665E-03	3.997E-02	7.550E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.110E-05	2.443E-05	3.109E-05	8.439E-06	4.663E-05

Combined HAPs: 0.04

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

Greenhouse Gas Emissions

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	2,665	0.1	0.0
Summed Potential Emissions in tons/yr	2,665		
CO2e Total in tons/yr	2,681		

Methodology:
 The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
 Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

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

Company Name: Heartland Sweeteners, LLC
Address City IN Zip: 4635 West 84th Street, Indianapolis, IN 46268
8460 Bearing Drive, Indianapolis, IN 46268
Permit Number: 097-31181-00685
Plt ID: 097-00685
Reviewer: Jason R. Krawczyk
Date: January 30, 2012

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Raw Material Semi Trucks (entering plant)	8.0	1.0	8.0	40.00	320.0	845	0.160	1.28	467.31
Raw Material Semi Trucks (leaving plant)	8.0	1.0	8.0	20.00	160.0	845	0.160	1.28	467.31
Product Semi Trucks (entering plant)	3.0	1.0	3.0	20.0	60.0	845	0.160	0.48	175.24
Product Semi Trucks (leaving plant)	3.0	1.0	3.0	40.0	120.0	845	0.160	0.48	175.24
Totals			22.0		660.0			3.52	1285.10

Average Vehicle Weight Per Trip =

30.0

 tons/trip
Average Miles Per Trip =

0.16

 miles/trip

Unmitigated Emission Factor, Ef = $[k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	30.0	30.0	30.0	tons = average vehicle weight (provided by source)
sL =	1.1	1.1	1.1	From AP-42, Chapter 13.2.1, Table 13.2.1-3 (average silt loading from corn wet mills)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

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

126

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

365

 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.385	0.077	0.0189	lb/mile
Mitigated Emission Factor, Eext =	0.352	0.070	0.0173	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Raw Material Semi Trucks (entering plant)	0.09	0.02	0.00	0.08	0.02	0.00
Raw Material Semi Trucks (leaving plant)	0.09	0.02	0.00	0.08	0.02	0.00
Product Semi Trucks (entering plant)	0.03	0.01	0.00	0.03	0.01	0.00
Product Semi Trucks (leaving plant)	0.03	0.01	0.00	0.03	0.01	0.00
Totals	0.25	0.05	0.01	0.23	0.05	0.01

Methodology

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

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit

Appendix A: Emission Calculations
Fugitive Dust Emissions - Distribution Plant Paved Roads

Company Name: Heartland Sweeteners, LLC
Address City IN Zip: 4635 West 84th Street, Indianapolis, IN 46268
 8460 Bearing Drive, Indianapolis, IN 46268
Permit Number: 097-31181-00685
Plt ID: 097-00685
Reviewer: Jason R. Krawczyk
Date: January 30, 2012

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Product Semi Trucks (entering plant)	3.0	1.0	3.0	20.00	60.0	317	0.060	0.18	65.74
Product Semi Trucks (leaving plant)	3.0	1.0	3.0	40.00	120.0	317	0.060	0.18	65.74
Shipping Vans (entering plant)	10.0	1.0	10.0	5.8	58.0	317	0.060	0.60	219.14
Shipping Vans (leaving plant)	10.0	1.0	10.0	8.0	80.0	317	0.060	0.60	219.14
Totals			26.0		318.0			1.56	569.76

Average Vehicle Weight Per Trip =

12.2

 tons/trip
 Average Miles Per Trip =

0.06

 miles/trip

Unmitigated Emission Factor, Ef = $[k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	12.2	12.2	12.2	tons = average vehicle weight (provided by source)
sL =	1.1	1.1	1.1	From AP-42, Chapter 13.2.1, Table 13.2.1-3 (average silt loading from corn wet mills)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

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

126

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

365

 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.154	0.031	0.0076	lb/mile
Mitigated Emission Factor, Eext =	0.141	0.028	0.0069	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Raw Material Semi Trucks (entering plant)	0.01	0.00	0.00	0.00	0.00	0.00
Raw Material Semi Trucks (leaving plant)	0.01	0.00	0.00	0.00	0.00	0.00
Product Semi Trucks (entering plant)	0.02	0.00	0.00	0.02	0.00	0.00
Product Semi Trucks (leaving plant)	0.02	0.00	0.00	0.02	0.00	0.00
Totals	0.04	0.01	0.00	0.04	0.01	0.00

Methodology

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

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particle Matter (<2.5 um)
 PTE = Potential to Emit



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Jeff Mack
Heartland Sweeteners, LLC
4635 W 84th St
Indianapolis, IN 46268

DATE: March 15, 2012

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

SUBJECT: Final Decision
FESOP
097-31181-00685

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:
David Dempsey (Trinity Consultants)
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

March 15, 2012

TO: Pike Township Library

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

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

Applicant Name: Heartland Sweeteners, LLC
Permit Number: 097-31181-00685

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	MIDENNEY 3/15/2012 Heartland Sweeteners, LLC 097-31181-00685 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Jeff Mack Heartland Sweeteners, LLC 4635 W 84th St Indianapolis IN 46268 (Source CAATS) via confirm delivery										
2		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)										
3		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
4		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
5		Pike Branch Library 6525 Zionsville Road Indianapolis IN 46268 (Library)										
6		Mr. David Dempsey Trinity Consultants 201 N. Illinois St, 16th Flr. South Tower Indianapolis IN 46204 (Consultant)										
7		Matt Mosier Office of Sustainability 1200 S Madison Ave #200 Indianapolis IN 46225 (Local Official)										
8		William F & Harriett E Weaver 4532 W 81st Place Indianapolis IN 46268 (Affected Party)										
9		Deanna Forestal 4430 Owl Court Indianapolis IN 46268 (Affected Party)										
10		Stephen R & Nancy S Rasmussen 8205 Georgetown Road Indianapolis IN 46268 (Affected Party)										
11		Robert L. & Elizabeth A OBrien 4606 W 81st Place Indianapolis IN 46268 (Affected Party)										
12		Ronald R Twaddell 4520 W 81st Place Indianapolis IN 46268 (Affected Party)										
13		Brian J & Alyce A Halper 7134 Spring Mill Road Indianapolis IN 46260 (Affected Party)										
14		Lucinda Moore 4620 W 81st Place Indianapolis IN 46268 (Affected Party)										
15		Jeffery M Josephs North By Northwest AB Biynah, LLC 730 Second Avenue, Suite 415 Minneapolis MN 55402 (Affected Party)										

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