INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: November 29, 2012

RE: Helena Chemical Company – Huntington Terminal / 069-32253-00084

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Ms. Jodi Heath
Fertilizer Branch Manager
Helena Chemical Company - Huntington Terminal
321 Thurman Poe Way
Huntington, Indiana 46750

November 29, 2012

Re: 069-32253-00084
First Significant Revision to
F069-29024-00084

Dear Ms. Heath:

Helena Chemical Company - Huntington Terminal was issued a Federally Enforceable State Operating Permit (FESOP) No. F069-29024-00084 on August 3, 2010 for a dry and liquid fertilizer mixing, storage and distribution operation located at 321 Thurman Poe Way, Huntington, Indiana 46750. On August 27, 2012, the Office of Air Quality (OAQ) received an application from the source requesting to remove the PM stack test for the Polyphosphate Blender and to clarify that the maximum throughput of 15 tons per hour is for the dry ingredients only. Based on the information provided by the source why PM testing is not necessary, the removal of this testing has been reviewed and approved by IDEM. The attached Technical Support Document (TSD) provides additional explanation of the changes to the permit.

Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f)(1)(I). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Ms. Renee Traivaranon, of my staff, at 317-234-5615 or 1-800-451-6027, and ask for extension 4-56155615.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Notice of Decision
Technical Support Document and revised permit
Calculations

IC/rt

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

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

Helena Chemical Company - Huntington Terminal
321 Thurman Poe Way
Huntington, Indiana 46750

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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

Operation Permit No.: F069-29024-00084	
Original signed by: Alfred C. Dumaual, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: August 3, 2010 Expiration Date: August 3, 2015

First Administrative Amendment No.: F069-31771-00084, issued on May 30, 2012

First Significant Permit Revision No. F069-32253-00084	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 29, 2012 Expiration Date: August 3, 2015

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary dry and liquid fertilizer mixing, storage and distribution operation.

Source Address:	321 Thurman Poe Way, Huntington, Indiana 46750
General Source Phone Number:	(317) 815-6370
SIC Code:	2874 (Phosphatic Fertilizers), 2875 (Fertilizers, Mixing Only)
County Location:	Huntington
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

Dry Formulation Process

One (1) Dry Formulation process, identified as DF, with a limited production rate of 50,000 tons per twelve (12) consecutive month period, consisting of the following emission units:

(a) Rail Unloading, identified as DF-1A, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stack EP-7.

(b) Truck Unloading, identified as DF-1B, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stack EP-8.

Note: The Rail and Truck Unloading cannot operate simultaneously.

(c) One (1) enclosed conveyor, identified as DF-2, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-7 and EP-8.

(d) One (1) enclosed bucket elevator, identified as DF-3, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(e) One (1) elevator dump to pile - aggregate material, identified as DF-4, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(f) One (1) front-end loader dump, identified as DF-5 constructed in 2011, with a maximum capacity of 700 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.

(g) One (1) floor inlet/hopper for wholesale product bins, identified as DF-6, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.

(h) One (1) enclosed wholesale conveyor, identified as DF-8, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.

(i) One (1) enclosed wholesale bucket elevator, identified as DF-10, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.

(j) One (1) enclosed wholesale bucket elevator dump, identified as DF-11, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.

(k) One (1) enclosed retail bucket elevator dump to bin, identified as DF-13, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.

(l) One (1) Product 4 truck unloading operation, identified as DF-14, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled, and exhausting to stacks EP-1A and EP-2A.

(m) One (1) enclosed Product 4 conveyor and bin loading operation, identified as DF-15 and DF-16, respectively, constructed in 2011, with a maximum capacity of 30 tons per hour, with uncontrolled, and exhausting to stacks EP-1 and EP-2.

(n) One (1) Product 4 skid loader, identified as DF-17, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.

(o) One (1) Product 4 skid loader dump, identified as DF-18, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(p) One (1) enclosed Product 4 bucket elevator, identified as DF-19, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(q) One (1) enclosed bucket elevator dump, identified as DF-20, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(r) One (1) enclosed wholesale bin dump, identified as DF-21, approved for construction in 2010 constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(s) One (1) enclosed retail bin dump, identified as DF-22, constructed in 2011, with a maximum capacity of 120 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(t) One (1) enclosed Product 4 retail bin dump, identified as DF-23, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(u) One (1) enclosed retail product blender, identified as DF-24, constructed in 2011, with a maximum capacity of 120 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(v) One (1) bin dump - wholesale loadout, identified as DF-25, constructed in 2011, with a maximum capacity of 200 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(w) One (1) bin dump - retail loadout, identified as DF-26A, constructed in 2011, with a maximum capacity of 120 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(x) One (1) Product 4 - retail loadout, identified as DF-26B, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(y) Storage piles, identified as DF-27, constructed in 2011, with a maximum capacity of 50,000 tons per year, uncontrolled and exhausting to stacks EP-1 and EP-2.

Liquid Formulation Process

One (1) Liquid Formulation Process, identified as FB, with a limited maximum throughput of 15 tons per hour of dry ingredients, consisting of the following emission units:

(a) One (1) Product 1 Hopper, identified as FB-1, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled and exhausting to stack EP-4.

(b) One (1) Product 1 pneumatic conveyor into bin, identified as FB-2, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled and exhausting to stack EP-4.

(c) One (1) enclosed Product 1 auger to blender, identified as FB-3, constructed in 2011, with a maximum capacity of 75 tons per hour, uncontrolled, and exhausting to stack EP-4.

(d) One (1) Product 1 belly dump conveyer - hopper, identified as FB-4, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-3.

(e) One (1) Product 1 pneumatic conveyor into bin, identified as FB-5, approved for construction in 2010 constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-3.

(f) One (1) enclosed Product 1 auger into blender, identified as FB-6, constructed in 2011, with a maximum capacity of 75 tons per hour, uncontrolled, and exhausting to stack EP-3.

(g) One (1) Product 1 dump super sack contents, identified as FB-7, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(h) One (1) enclosed Product 1 bucket elevator conveyance of super sack contents, identified as FB-8, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(i) One (1) Product 1 bucket elevator dump, identified as FB-9, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(j) One (1) Product 1 blender, identified as FB-10, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(k) One (1) enclosed Product 2 auger to blender, identified as FB-11, constructed in 2011, with a maximum capacity of 75 tons per hour, uncontrolled, and exhausting to stack EP-5.

(l) One (1) Product 2 dump super sack contents, identified as FB-12, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(m) One (1) enclosed Product 2 elevator conveyance of super sack contents, identified as FB-13, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(n) One (1) Product 2 bucket elevator dump, identified as FB-14, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(o) One (1) Product 2 blender, identified as FB-15, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(p) One (1) enclosed Product 3 auger into blender, identified as FB-16, constructed in 2011, with a maximum capacity of 75 tons per hour, uncontrolled, and exhausting to stack EP-5.

(q) One (1) Product 3 blender, identified as FB-17, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(r) One (1) Product 4L dump super sack of contents, identified as FB-18, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(s) One (1) enclosed Product 4L bucket elevator conveyance of super sack contents, identified as FB-19, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(t) One (1) Product 4L bucket elevator dump, identified as FB-20, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(u) One (1) enclosed Product 4L blender, identified as FB-21, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(v) One (1) polyphosphate blender, identified as FB-22, constructed in 2011, with a maximum capacity of 50 tons per hour, uncontrolled, and exhausting to stack EP-6.

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

This stationary source also includes the following insignificant activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million Btu per hour:

(1) Two (2) natural gas-fired boilers, identified as EU-1 and EU-2, approved for construction in 2010, with a heat input rate of 6 MMBtu per hour and 1 MMBtu per hour, respectively, uncontrolled, and exhausting to stacks EP-9 and EP-10, respectively.

(b) Repair activities, including the following:
(1) Heat exchanger cleaning and repair

(2) Process vessel degassing and cleaning to prepare for internal repairs.

(c) Unpaved Roads

(d) Storage tanks that do not store VOCs or HAPs, including the following:

Tank ID	Installation Date	Tank Type	Maximum Storage Capacity (gallons)	Control Technique(s)
T-1	2010	Fixed Roof, Dome	30,000	Vapor Recovery System
T-2	2010	Fixed Roof, Dome	30,000	None
T-3	2010	Fixed Roof, Dome	30,000	None
T-4	2010	Fixed Roof, Dome	30,000	None
T-5	2010	Fixed Roof, Dome	30,000	None
T-6	2010	Fixed Roof, Dome	30,000	None
T-7A	2010	Pressure Tank	30,000	Vapor Recovery System
T-7B	2010	Pressure Tank	30,000	Vapor Recovery System
T-8	2010	Fixed Roof, Dome	21,000	None
T-9	2010	Fixed Roof, Dome	21,000	None
T-10	2010	Fixed Roof, Dome	21,000	None
T-11	2010	Fixed Roof, Dome	30,000	None
T-12	2010	Fixed Roof, Dome	30,000	None
T-13	2010	Fixed Roof, Dome	30,000	None
T-14	2010	Fixed Roof, Dome	30,000	None
T-15	2010	Fixed Roof, Dome	30,000	None
T-16	2010	Fixed Roof, Dome	30,000	None
T-17	2010	Fixed Roof, Dome	30,000	None
T-18	2010	Fixed Roof, Dome	30,000	None
T-19	2010	Fixed Roof, Dome	30,000	None
T-20	2010	Fixed Roof, Cone	500,000	None
T-21	2010	Fixed Roof, Cone	500,000	None
T-22	2010	Fixed Roof, Cone	1,000,000	None
T-23	2010	Fixed Roof, Cone	1,000,000	None
T-24	2010	Fixed Roof, Cone	1,000,000	None
T-25	2010	Fixed Roof, Cone	1,000,000	None
T-26	2010	Fixed Roof, Cone	300,000	None
T-27	2010	Fixed Roof, Cone	21,000	None
MB Group 1	2010	46 Mini-bulk tanks	275, each	None
MB Group 2	2010	1,000 Mini-bulk tanks	275, each	None

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

(a) This permit, F069-29024-00084, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

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

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

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

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

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(i) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and

(ii) the certification is based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

(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 F069-29024-00084 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 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

(a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.26 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM) 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.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.

C.8 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.9 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.10 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.11 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.12 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.13 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.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

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

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

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

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

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

C.15 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.16 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.17 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.18 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.19 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.20 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:

Dry Formulation Process

One (1) Dry Formulation process, identified as DF, with a limited production rate of 50,000 tons per twelve (12) consecutive month period, consisting of the following emission units:

(a) Rail Unloading, identified as DF-1A, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stack EP-7.

(b) Truck Unloading, identified as DF-1B, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stack EP-8.

(c) One (1) enclosed conveyor, identified as DF-2, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-7 and EP-8.

(d) One (1) enclosed bucket elevator, identified as DF-3, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(e) One (1) elevator dump to pile - aggregate material, identified as DF-4, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(f) One (1) front-end loader dump, identified as DF-5 constructed in 2011, with a maximum capacity of 700 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.

(g) One (1) floor inlet/hopper for wholesale product bins, identified as DF-6, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.

(h) One (1) enclosed wholesale conveyor, identified as DF-8, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.

(i) One (1) enclosed wholesale bucket elevator, identified as DF-10, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.

(j) One (1) enclosed wholesale bucket elevator dump, identified as DF-11, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.

(k) One (1) enclosed retail bucket elevator dump to bin, identified as DF-13, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.

(l) One (1) Product 4 truck unloading operation, identified as DF-14, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled, and exhausting to stacks EP-1A and EP-2A.

(m) One (1) enclosed Product 4 conveyor and bin loading operation, identified as DF-15 and DF-16, respectively, constructed in 2011, with a maximum capacity of 30 tons per hour, with uncontrolled, and exhausting to stacks EP-1 and EP-2.

(n) One (1) Product 4 skid loader, identified as DF-17, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.

(o) One (1) Product 4 skid loader dump, identified as DF-18, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(p) One (1) enclosed Product 4 bucket elevator, identified as DF-19, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(q) One (1) enclosed bucket elevator dump, identified as DF-20, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(r) One (1) enclosed wholesale bin dump, identified as DF-21, approved for construction in 2010 constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(s) One (1) enclosed retail bin dump, identified as DF-22, constructed in 2011, with a maximum capacity of 120 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(t) One (1) enclosed Product 4 retail bin dump, identified as DF-23, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(u) One (1) enclosed retail product blender, identified as DF-24, constructed in 2011, with a maximum capacity of 120 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(v) One (1) bin dump - wholesale loadout, identified as DF-25, constructed in 2011, with a maximum capacity of 200 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(w) One (1) bin dump - retail loadout, identified as DF-26A, constructed in 2011, with a maximum capacity of 120 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(x) One (1) Product 4 - retail loadout, identified as DF-26B, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

(y) Storage piles, identified as DF-27, constructed in 2011, with a maximum capacity of 50,000 tons per year, uncontrolled and exhausting to stacks EP-1 and EP-2.

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

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

D.1.1 PSD Minor Limit [326 IAC 2-2] [326 IAC 2-8]

(a) The PM emissions from the Dry Formulation process shall be less than the following:

Emission Unit	Unit ID	PM Limit (lb/ton)
Rail Unloading	DF-1A	0.0069
Truck Unloading	DF-1B	0.0069
Conveyor	DF-2	0.0069
Bucket Elevator	DF-3	0.0069
Elevator Dump to Pile - Aggregate Material	DF-4	0.0069
Front End Loader Dump	DF-5	0.0069
Floor Inlet with Conditioner - Wholesale	DF-6	0.0069
Wholesale Conveyor	DF-8	0.0069

Wholesale Bucket Elevator	DF-10	0.0069
Wholesale Bucket Elevator Dump	DF-11	0.0069
Retail Bucket Elevator Dump to Bin	DF-13	0.0069
Truck Unloading - Product 4	DF-14	0.544
Conveyor - Product 4	DF-15	0.544
Bin Loading - Product 4	DF-16	0.544
Skid Loader - Product 4	DF-17	0.544
Skid Loader Dump - Product 4	DF-18	0.544
Bucket Elevator - Product 4	DF-19	0.544
Bucket Elevator Dump	DF-20	0.0069
Bin Dump - Wholesale	DF-21	0.0069
Bin Dump - Retail	DF-22	0.0069
Bin Dump - Retail	DF-23	0.544
Blender - Retail	DF-24	0.544
Bin Dump - Wholesale	DF-25	0.0069
Bin Dump - Retail Loadout	DF-26A	0.0069
Bin Dump Retail Loadout - Product 4	DF-26B	0.995

(b) The PM10/PM2.5 emissions from the Dry Formulation process shall be less than the following:

Emission Unit	Unit ID	PM10/PM2.5 Limit (lb/ton)
Rail Unloading	DF-1A	0.0033
Truck Unloading	DF-1B	0.0033
Conveyor	DF-2	0.0033
Bucket Elevator	DF-3	0.0033
Elevator Dump to Pile - Aggregate Material	DF-4	0.0033
Front End Loader Dump	DF-5	0.0033
Floor Inlet with Conditioner - Wholesale	DF-6	0.0033
Wholesale Conveyor	DF-8	0.0033
Wholesale Bucket Elevator	DF-10	0.0033
Wholesale Bucket Elevator Dump	DF-11	0.0033
Retail Bucket Elevator Dump to Bin	DF-13	0.0033
Truck Unloading - Product 4	DF-14	0.134
Conveyor - Product 4	DF-15	0.134
Bin Loading - Product 4	DF-16	0.134
Skid Loader - Product 4	DF-17	0.134
Skid Loader Dump - Product 4	DF-18	0.134
Bucket Elevator - Product 4	DF-19	0.134
Bucket Elevator Dump	DF-20	0.0033
Bin Dump - Wholesale	DF-21	0.0033
Bin Dump - Retail	DF-22	0.0033
Bin Dump - Retail	DF-23	0.134
Blender - Retail	DF-24	0.134
Bin Dump - Wholesale	DF-25	0.0033
Bin Dump - Retail Loadout	DF-26A	0.0033
Bin Dump Retail Loadout - Product 4	DF-26B	0.278

(c) The dry ingredient input to the Dry Formulation process shall be less than 51,500 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits, combined with the potential to emit PM, PM10 and PM2.5 from other emission units at the source, shall limit the PM from the entire source to less than 250 tons per twelve (12) consecutive month period, PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period and render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) emissions from the units in the following table shall not exceed the following limits:

Emission Unit	Unit ID	Maximum Process Weight Rate (tons/hr)	6-3-2 PM Limit (lbs/hr)
Rail Unloading	DF-1A	300	63.00
Truck Unloading	DF-1B	300	63.00
Conveyor	DF-2	300	63.00
Bucket Elevator	DF-3	300	63.00
Elevator Dump to Pile - Aggregate Material	DF-4	300	63.00
Front-End Loader Dump	DF-5	700	73.06
Floor Inlet with Conditioner - Wholesale	DF-6	300	63.00
Wholesale Conveyor	DF-8	300	63.00
Wholesale Bucket Elevator	DF-10	300	63.00
Wholesale Bucket Elevator Dump	DF-11	300	63.00
Retail Bucket Elevator Dump to Bin	DF-13	300	63.00
Truck Unloading - Product 4	DF-14	30	40.04
Converor - Product 4	DF-15	30	40.04
Bin Loading - Product 4	DF-16	30	40.04
Skid Loader - Product 4	DF-17	30	40.04
Skid Loader Dump - Product 4	DF-18	30	40.04
Bucket Elevator Dump	DF-19	30	40.04
Bucket Elevator Dump	DF-20	30	40.04
Bin Dump - Wholesale	DF-21	200	58.51
Bin Dump - Retail	DF-22	120	53.13
Bin Dump - Retail Product 4	DF-23	30	40.04
Blender - Retail	DF-24	120	53.13
Bin Dump - Wholesale Loadout	DF-25	200	58.51
Bin Dump - Retail Loadout	DF-26A	120	53.13
Bin Dump - Retail Loadout - Product 4	DF-26B	30	40.04
Storage Piles	DF-27	5.71	26.62

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

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

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

$$E = 55.0\ P^{0.11} - 40$$

Where: E = Rate of Emission in pounds per hour
P = Process weight rate in tons per hour

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

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

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

D.1.4 Visible Emission Notations

(a) Daily visible emission notations of the Dry Formulation Process stack exhaust (Stacks EP-1 and EP-2) shall be performed 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 response steps. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.5 Record Keeping Requirement

(a) In order to demonstrate the compliance status with Condition D.1.1(c), the Permittee shall maintain records of the dry ingredient input to the Dry Formulation Process for each month and for each compliance period.

(b) In order to demonstrate the compliance status with Condition D.1.4, the Permittee shall maintain daily records of the visible emission notations of the Dry Formulation Process stack exhaust (EP-1 and EP-2). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

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

D.1.6 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1(c) shall be submitted using the reporting form located at the end of this permit, or its equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee’s obligation with regard to the reporting required by this condition. The report 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).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Liquid Formulation Process

One (1) Liquid Formulation Process, identified as FB, with a limited maximum throughput of 15 tons per hour of dry ingredients, consisting of the following emission units:

(a) One (1) Product 1 Hopper, identified as FB-1, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled and exhausting to stack EP-4.

(b) One (1) Product 1 pneumatic conveyor into bin, identified as FB-2, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled and exhausting to stack EP-4.

(c) One (1) enclosed Product 1 auger to blender, identified as FB-3, constructed in 2011, with a maximum capacity of 75 tons per hour, uncontrolled, and exhausting to stack EP-4.

(d) One (1) Product 1 belly dump conveyer - hopper, identified as FB-4, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-3.

(e) One (1) Product 1 pneumatic conveyor into bin, identified as FB-5, approved for construction in 2010 constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-3.

(f) One (1) enclosed Product 1 auger into blender, identified as FB-6, constructed in 2011, with a maximum capacity of 75 tons per hour, uncontrolled, and exhausting to stack EP-3.

(g) One (1) Product 1 dump super sack contents, identified as FB-7, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(h) One (1) enclosed Product 1 bucket elevator conveyance of super sack contents, identified as FB-8, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(i) One (1) Product 1 bucket elevator dump, identified as FB-9, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(j) One (1) Product 1 blender, identified as FB-10, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(k) One (1) enclosed Product 2 auger to blender, identified as FB-11, constructed in 2011, with a maximum capacity of 75 tons per hour, uncontrolled, and exhausting to stack EP-5.

(l) One (1) Product 2 dump super sack contents, identified as FB-12, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(m) One (1) enclosed Product 2 elevator conveyance of super sack contents, identified as FB-13, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(n) One (1) Product 2 bucket elevator dump, identified as FB-14, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(o) One (1) Product 2 blender, identified as FB-15, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(p) One (1) enclosed Product 3 auger into blender, identified as FB-16, constructed in 2011, with a maximum capacity of 75 tons per hour, uncontrolled, and exhausting to stack EP-5.

(q) One (1) Product 3 blender, identified as FB-17, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(r) One (1) Product 4L dump super sack of contents, identified as FB-18, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(s) One (1) enclosed Product 4L bucket elevator conveyance of super sack contents, identified as FB-19, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(t) One (1) Product 4L bucket elevator dump, identified as FB-20, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(u) One (1) enclosed Product 4L blender, identified as FB-21, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

(v) One (1) polyphosphate blender, identified as FB-22, constructed in 2011, with a maximum capacity of 50 tons per hour, uncontrolled, and exhausting to stack EP-6.

(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.2.1 PSD Minor Limit [326 IAC 2-2] [326 IAC 2-8]

(a) The PM emissions from the Liquid Formulation process shall be less than the following:

Emission Unit	Unit ID	PM Limit (lb/ton)
Product 1 Hopper	FB-1	0.0069
Product 1 Pneumatic Conveyor into Bin	FB-2	0.72
Product 1 Auger to Blender	FB-3	0.061
Product 1 Belly Dump Conveyor - Hopper	FB-4	0.0069
Product 1 Pneumatic Conveyor into Bin	FB-5	0.72
Product 1 Auger into Blender	FB-6	0.061
Product 1 Dump Super Sack Contents	FB-7	0.0069
Product 1 Bucket Elevator Conveyance of Super Sack Contents	FB-8	0.0069
Product 1 Bucket Elevator	FB-9	0.0069
Product 1 Blender	FB-10	0.554
Product 2 Auger to Blender	FB-11	0.061
Product 2 Auger to Blender	FB-12	0.0069
Product 2 Bucket Elevator Conveyance of Super Sack Contents	FB-13	0.0069
Product 2 Bucket Elevator Dump	FB-14	0.0069
Product 2 Blender	FB-15	0.554
Product 3 Auger into Blender	FB-16	0.061
Product 3 Blender	FB-17	0.554
Product 4L Dump Super Sack of Contents	FB-18	0.0069

Emission Unit	Unit ID	PM Limit (lb/ton)
Product 4L Bucket Elevator Conveyance of Super Sack Contents	FB-19	0.0069
Product 4L Bucket Elevator Dump	FB-20	0.0069
Product 4L Blender	FB-21	0.554
Polyphosphate Blender	FB-22	0.15

(b) The PM10/PM2.5 emissions from the Liquid Formulation process shall be less than the following:

Emission Unit	Unit ID	PM10/PM2.5 Limit (lb/ton)
Product 1 Hopper	FB-1	0.0033
Product 1 Pneumatic Conveyor into Bin	FB-2	0.46
Product 1 Auger to Blender	FB-3	0.0034
Product 1 Belly Dump Conveyor - Hopper	FB-4	0.0033
Product 1 Pneumatic Conveyor into Bin	FB-5	0.46
Product 1 Auger into Blender	FB-6	0.0034
Product 1 Dump Super Sack Contents	FB-7	0.0033
Product 1 Bucket Elevator Conveyance of Super Sack Contents	FB-8	0.0033
Product 1 Bucket Elevator	FB-9	0.0033
Product 1 Blender	FB-10	0.134
Product 2 Auger to Blender	FB-11	0.0034
Product 2 Auger to Blender	FB-12	0.0033
Product 2 Bucket Elevator Conveyance of Super Sack Contents	FB-13	0.0033
Product 2 Bucket Elevator Dump	FB-14	0.0033
Product 2 Blender	FB-15	0.134
Product 3 Auger into Blender	FB-16	0.0034
Product 3 Blender	FB-17	0.134
Product 4L Dump Super Sack of Contents	FB-18	0.0033
Product 4L Bucket Elevator Conveyance of Super Sack Contents	FB-19	0.0033
Product 4L Bucket Elevator Dump	FB-20	0.0033
Product 4L Blender	FB-21	0.134
Polyhosphate Blender	FB-22	0.15

(c) The dry ingredient input to the Liquid Formulation process shall be less than 39,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits, combined with the potential to emit PM, PM10 and PM2.5 from other emission units at the source, shall limit the PM from the entire source to less than 250 tons per twelve (12) consecutive month period, PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period and render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.2.2 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) emissions from the units in the following table shall not exceed the following limits:

Emission Unit	Unit ID	Maximum Process Weight Rate (tons/hr)	6-3-2 PM Limit (lbs/hr)
Product 1 Hopper	FB-1	15	25.16
Product 1 Pneumatic Conveyor into Bin	FB-2	15	25.16
Product 1 Auger to Blender	FB-3	75	48.43
Product 1 Belly Dump Conveyor - Hopper	FB-4	15	25.16
Product 1 Pneumatic Conveyor into Bin	FB-5	15	25.16
Product 1 Auger into Blender	FB-6	75	48.43
Product 1 Dump Super Sack Contents	FB-7	15	25.16
Product 1 Bucket Elevator Conveyance of Super Sack Contents	FB-8	15	25.16
Product 1 Bucket Elevator	FB-9	15	25.16
Product 1 Blender	FB-10	15	25.16
Product 2 Auger to Blender	FB-11	75	48.43
Product 2 Auger to Blender	FB-12	15	25.16
Product 2 Bucket Elevator Conveyance of Super Sack Contents	FB-13	15	25.16
Product 2 Bucket Elevator Dump	FB-14	15	25.16
Product 2 Blender	FB-15	15	25.16
Product 3 Auger into Blender	FB-16	75	48.43
Product 3 Blender	FB-17	15	25.16
Product 4L Dump Super Sack of Contents	FB-18	15	25.16
Product 4L Bucket Elevator Conveyance of Super Sack Contents	FB-19	15	25.16
Product 4L Bucket Elevator Dump	FB-20	15	25.16
Product 4L Blender	FB-21	15	25.16
Polyphosphate Blender	FB-22	50	44.58

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

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

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

$$E = 55.0\ P^{0.11} - 40$$

Where: E = Rate of Emission in pounds per hour
P = Process weight rate in tons per hour

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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

D.2.4 Visible Emission Notations

(a) Daily visible emission notations of the Liquid Formulation Process stack exhaust (Stacks EP-3, EP-4, EP-5 and EP-6) shall be performed 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 response steps. Failure to take response steps shall be considered a deviation from this permit.

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

D.2.5 Record Keeping Requirements

(a) In order to demonstrate the compliance status with Condition D.2.1(c), the Permittee shall maintain records of the dry ingredient input to the Liquid Formulation Process for each month and for each compliance period.

(b) In order to demonstrate the compliance status with Condition D.2.4, the Permittee shall maintain daily records of the visible emission notations of the Liquid Formulation Process stack exhausts (EP-3, EP-4, EP-5 and EP-6). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

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

D.2.6 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.2.1(c) shall be submitted using the reporting form located at the end of this permit, or its equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee’s obligation with regard to the reporting required by this condition. The report 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).

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million Btu per hour:

(1) Two (2) natural gas-fired boilers, identified as EU-1 and EU-2, approved for construction in 2010, with a heat input rate of 6 MMBtu per hour and 1 MMBtu per hour, respectively, uncontrolled, and exhausting to stacks EP-9 and EP-10, respectively.

(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.3.1 Particulate [326 IAC 6-2]

Pursuant to 326 IAC 326 IAC 6-2-4, the particulate from the boilers identified as EU-1 and EU-2 shall not exceed 0.6 pound per MMBtu.

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Helena Chemical Company - Huntington Terminal
Source Address: 321 Thurman Poe Way, Huntington, Indiana 46750
FESOP Permit No.: F069-29024-00084

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: Helena Chemical Company - Huntington Terminal
Source Address: 321 Thurman Poe Way, Huntington, Indiana 46750
FESOP Permit No.: F069-29024-00084

This form consists of 2 pages **Page 1 of 2**

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

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

FESOP Quarterly Report

Source Name: Helena Chemical Company - Huntington Terminal
Source Address: 321 Thurman Poe Way, Huntington, Indiana 46750
FESOP Permit No.: F069-29024-00084
Facility: Dry Formulation Process
Parameter: Dry ingredient input
Limit: 51,500 tons per twelve (12) consecutive month period

YEAR:_____

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

☐ No deviation occurred in this quarter.

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

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

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

FESOP Quarterly Report

Source Name: Helena Chemical Company - Huntington Terminal
Source Address: 321 Thurman Poe Way, Huntington, Indiana 46750
FESOP Permit No.: F069-29024-00084
Facility: Liquid Formulation Process
Parameter: Dry ingredient input
Limit: 39,000 tons per twelve (12) consecutive month period

YEAR:_____

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

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
Deviation has been reported on_____

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

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

Source Name: Helena Chemical Company - Huntington Terminal
Source Address: 321 Thurman Poe Way, Huntington, Indiana 46750
FESOP Permit No.: F069-29024-00084

Months: _____ to _____ Year: _____

Page 1 of 2

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".
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

Helena Chemical Company - Huntington Terminal
321 Thurman Poe Way
Huntington, Indiana 46750

Affidavit of Construction

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)

4. I hereby certify that Helena Chemical Company - Huntington Terminal 321 Thurman Poe Way, Huntington, Indiana 46750, completed construction of the dry and liquid fertilizer mixing, storage and distribution operation on _____in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on February 26, 2010 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F069-29024-00084, Plant ID No. 069-00084 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)

Attachment A
Fugitive Dust Control Plan

Permit No. F069-29024-00084

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

Helena Chemical Company - Huntington Terminal
321 Thurman Poe Way
Huntington, Indiana 46750

Property Owner

Helena Chemical Company
11711 N. Pennsylvania Ave., Suite 270
Carmel, IN 46032
Phone: (317) 815-6370

FUGITIVE EMISSIONS

Fugitive Emissions Sources

According to 326 IAC 6-4, fugitive dust is the generation of particulate matter to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located. Fugitive dust emission sources for the facility include those from paved and/or unpaved roads and parking lots. Figure 1 indicates the location of fugitive emission sources for the facility.

Vehicular Activity

The facility will receive raw materials and ship finished product via trucks over unpaved roads. The vehicular traffic generates fugitive emissions of particulate matter (PM), particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) and particulate matter with an aerodynamic diameter of 2.5 microns or less ($PM_{2.5}$). The particulate emission rates have been calculated based on published equations, emissions factors, and variables for unpaved haul roads (AP-42, Chapter 13.2.1, November 2009) (e.g."Typical Silt Content and Loading Values for Unpaved Roads at Industrial Facilities," for iron and steel production since and number of days with precipitation measuring at least 0.01 inch per year). Haul road lengths are based on the scale of the site diagram in Figure A-2. Traffic volume is based upon information from Helena Chemical on the raw materials and products that will be shipped into and out of the facility.

Potential emission rates are based on the maximum design rate (in tons per year) of each process unit, haul road lengths and vehicle weights. Actual emission rates are based on annual production figures provided by Helena Chemical Company.

Pollutant	Potential Emission Rate (pounds /hour)	Potential Emission Rate (tons/year)	Actual Emissions (tons/year)
PM	166	727	12.3
PM10	44	194	3.3
PM2.5	4.2	19.4	0.3

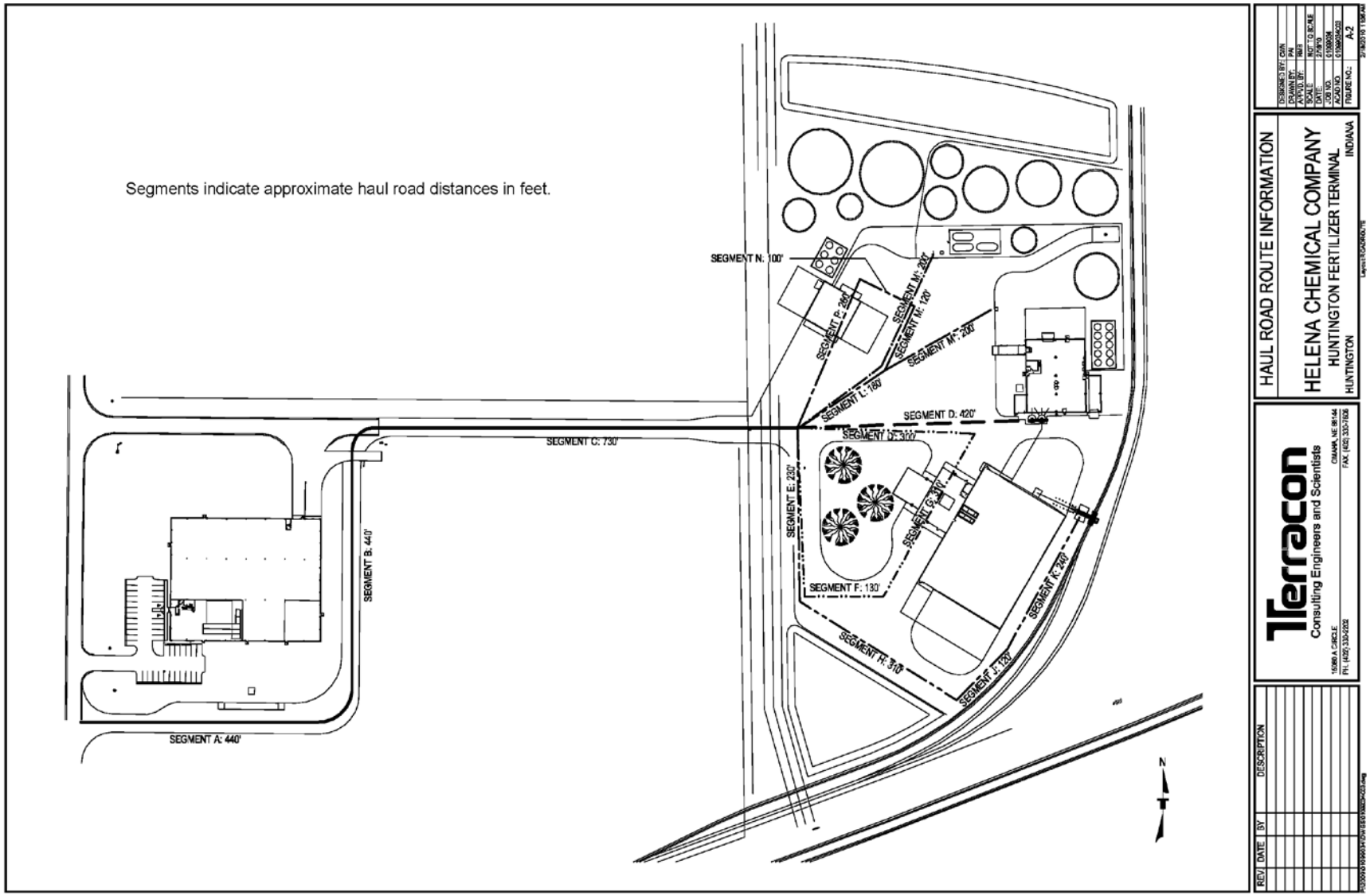
Helena has requested that production processes, rates, volumes, and information on the chemicals used in the processes and stored at the facility should be treated as confidential information.

DUST CONTROL MEASURES

Vehicular Activity

To control fugitive dust emissions from the unpaved roads and parking lots, the facility will spray water on the roads and parking lots, on an as-needed basis. A water truck or sprinkling system will be used to distribute water on the unpaved roads and parking lots, when needed. The goal of this control measure is to reduce fugitive dust emissions from migrating off the property.

A record will be maintained on site that documents when the control measure is implemented and the dates and times it is conducted. This record will be available upon the request of the IDEM, and will be retained for a minimum of three years.


Segments indicate approximate haul road distances in feet.
SEGMENT A: 440'
SEGMENT B: 440'
SEGMENT C: 730'
SEGMENT D: 420'
SEGMENT E: 230'
SEGMENT F: 130'
SEGMENT G: 310'
SEGMENT H: 310'
SEGMENT I: 120'
SEGMENT J: 120'
SEGMENT K: 240'
SEGMENT L: 180'
SEGMENT M: 200'
SEGMENT M': 200'
SEGMENT M': 120'
SEGMENT N: 100'
SEGMENT P: 260'
N
HAUL ROAD ROUTE INFORMATION
HELENA CHEMICAL COMPANY
HUNTINGTON FERTILIZER TERMINAL
HUNTINGTON
INDIANA
Terracon
Consulting Engineers and Scientists
OMAHA, NE 68144
FAX: (402) 333-7826
16866 A CIRCLE
PH: (402) 333-0220
REV
DATE
BY
DESCRIPTION
DESIGNED BY: CWN
DRAWN BY: MN
APPROVED BY: MS
SCALE: NOT TO SCALE
DATE: 2/14/19
JOB NO. 61098008
ACAD NO. 61098008C03
FIGURE NO.: A-2

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	**Helena Chemical Company - Huntington Terminal**
Source Location:	**321 Thurman Poe Way, Huntington, Indiana 46750**
County:	**Huntington**
SIC Code:	**2874 (Phosphatic Fertilizers),** **2875 (Fertilizers, Mixing Only)**
Operation Permit No.:	**F 069-29024-00084**
Operation Permit Issuance Date:	**August 3, 2010**
Significant Permit Revision No.:	**069-32253-00084**
Permit Reviewer:	**Renee Traivaranon**

On August 27, 2012, the Office of Air Quality (OAQ) received an application from Helena Chemical Company - Huntington Terminal related to a request to remove the existing PM stack testing requirement (Condition D.2.4) for the Polyphosphate Blender and to clarify that the maximum throughput of 15 tons per hour for the liquid formulation process refers to the dry ingredients only.

Existing Approvals

The source was issued a New Source Construction and FESOP No. F069-29024-00084 on August 3, 2010. The source has since received Administrative Amendment No. 069-31771-00084, issued on May 30, 2012.

County Attainment Status

The source is located in Huntington County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(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. Huntington 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) $PM_{2.5}$
Huntington County has been classified as attainment for $PM_{2.5}$. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct $PM_{2.5}$ significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct $PM_{2.5}$ and SO_2 emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants
Huntington County has been classified as attainment or unclassifiable in Indiana for 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

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, there is no applicable New Source Performance Standard that was in effect on August 7, 1980, therefore fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Status of the Existing Source

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)									
	PM	PM10*	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO_2e**	Total HAPs	Worst Single HAP
Dry Formulation	140.35	36.04	28.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Liquid Formulation	108.80	52.75	50.55	0.00	0.00	0.00	0.00	0.00	0.02	0.02 (Fluorides)
Natural Gas Combustion	0.06	0.23	0.23	0.02	3.07	0.17	2.58	3702	0.06	0.06 (Hexane)
Fugitive Emissions (Unpaved Roads)**	604.60	154.09	154.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total PTE of Entire Source	**249.21**	**89.02**	**79.58**	**0.02**	**3.07**	**0.17**	**2.58**	**3702**	**0.08**	**0.06 (Hexane)**
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA

*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".
**The 100,000 CO_2e 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.

The PTE is from Appendix A calculations to permit No. F069-31771-00084, issued on May 30, 2012.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Helena Chemical Company - Huntington Terminal on August 27, 2012, requesting to remove the existing PM stack testing requirement (Condition D.2.4) for the Polyphosphate Blender and to clarify that the maximum throughput of 15 tons per hour for the Liquid Formulation process refers to the dry ingredients only. The change in the description of the Liquid Formulation process does not result to any change in PTE or existing limits.

Note: There is no new or physical modification to any existing permitted units during this revision.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations of the existing units.

Permit Level Determination – FESOP Revision

Pursuant to 326 IAC 2-8-11.1(f)(1)(I), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is to remove a testing requirement. Based on the information provided by the source why the PM testing for the Polyphosphate Blender is not necessary, IDEM agreed to the removal of this testing requirement.

PTE of the Entire Source After Issuance of the FESOP Revision

There is no change to PTE resulting from this revision.

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 for this revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this revision.

Compliance Assurance Monitoring (CAM)

(c) 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

There are no changes to the existing applicable requirements due to the removal of the PM testing requirement.

Compliance Determination, Monitoring and Testing Requirements

(a) No additional testing is required for the description revision to the Liquid Formulation Process and the existing testing requirement has been removed per request.

Proposed Changes

(a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

(1) The words "dry ingredients" have been added to the maximum throughput of 15 tons per hour in the Liquid Formulation Process in A.2 Emission Units and Pollution Control Equipment Summary and Section D.2 Emissions Unit Description as follows:

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

…

Liquid Formulation Process

One (1) Liquid Formulation Process, identified as FB, with a limited maximum throughput of 15 tons per hour **of dry ingredients**, consisting of the following emission units:

SECTION D.2

Emissions Unit Description:

Liquid Formulation Process

One (1) Liquid Formulation Process, identified as FB, with a limited maximum throughput of 15 tons per hour **of dry ingredients**, consisting of the following emission units:

…..

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

..

(2) Condition D.2.4, Testing Requirement has been removed from the permit and record keeping has been revised and following conditions have been renumbered as follows.

Compliance Determination Requirements

~~D.2.4 Testing Requirement [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]~~

~~In order to demonstrate compliance with Condition D.2.1(a), the Permittee shall perform PM testing for the Polyphosphate Blender, identified as FB-22, no later than one hundred eighty (180) days after issuance of this FESOP (F069-29024-00084), utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.~~

D.2.~~5~~**4** Visible Emission Notations

…

D.2.~~6~~**5** Record Keeping Requirement

…

(b) In order to demonstrate the compliance status with Condition D.2.~~5~~**4**, the Permittee shall maintain daily records of ……

D.2.~~7~~**6** Reporting Requirements

…

(b) Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

(1) Stack identifications in the Condition D.2.5 Record keeping Requirements have been corrected for typographical errors as follows:

D.2.5 Record Keeping Requirement**s**

...

(b) ... the Permittee shall maintain daily records of the visible emission notations of the Liquid Formulation Process stack exhaust**s** (~~EP-1 and EP-2~~ **EP-3, EP-4, EP-5 and EP-6**). The Permittee shall include in its daily record when ...

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 August 27, 2012 and additional information was received on September 10, 2012 .

The construction and operation of this revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. F069-32253-00084. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Ms. Renee Traivaranon 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) 234-5615 or toll free at 1-800-451-6027 extension 4-5615.

(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

Appendix A: Emissions Calculations
Emissions Sumamry

Company Name: Helena Chemical Company - Huntington Terminal
Address City IN Zip: 321 Thurman Poe Way, Huntington, Indiana 46750
Permit Number: F069-32253-00084
Plt ID: 069-00084
Reviewer: Renee Traivaranon
Date: September 24, 2012

Potential Emissions

Pollutants	Dry Formulation	Liquid Formulation	Natural Gas Combustion	Unpaved Roads	Storage Tanks*	Total
PM	>250	>250	0.06	604.60	0.00	>250
PM10	>250	>250	0.23	154.09	0.00	>250
PM2.5	>250	>250	0.23	15.41	0.00	>250
SO2	0.00	0.00	0.02	0.00	0.00	0.02
NOx	0.00	0.00	3.07	0.00	0.00	3.07
VOC	0.00	0.00	0.17	0.00	0.00	0.17
CO	0.00	0.00	2.58	0.00	0.00	2.58
CO2e	0.00	0.00	3701.59	0.00	0.00	3701.59
Total HAPs	0.00	0.13	0.06	0.00	0.00	0.19
Worst-Case Individual HAP	0.00	0.13 (Fluorides)	0.06 (Hexane)	0.00	0.00	0.06 (Hexane)

Unpaved roads are considered sources of 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.
The source determined that the potential PM, PM10 and PM2.5 emissions exceed 250 tons per year., as indicated in FESOP No. 069-29024-00084, issued on August 3, 2012.

Limited Emissions

Pollutants	Dry Formulation	Liquid Formulation	Natural Gas Combustion	Unpaved Roads	Storage Tanks*	Total
PM	140.35	108.80	0.06	604.60	0.00	249.21
PM10	36.04	52.75	0.23	154.09	0.00	89.02
PM2.5	28.80	50.55	0.23	15.41	0.00	79.58
SO2	0.00	0.00	0.02	0.00	0.00	0.02
NOx	0.00	0.00	3.07	0.00	0.00	3.07
VOC	0.00	0.00	0.17	0.00	0.00	0.17
CO	0.00	0.00	2.58	0.00	0.00	2.58
CO2e	0.00	0.00	3701.59	0.00	0.00	3701.59
Total HAPs	0.00	0.02	0.06	0.00	0.00	0.08
Worst-Case Individual HAP	0.00	0.02 (Fluorides)	0.06 (Hexane)	0.00	0.00	0.06 (Hexane)

* Storage tanks do not contain volatile organic liquids. There are no emissions from the storage tanks.

Note:
The Tables above are from FESOP 069-31771-00084, issued on May 30, 2012.

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Appendix A: Emissions Calculations
Dry Formulation Process

Company Name: Helena Chemical Company - Huntington Terminal
Address City IN Zip: 321 Thurman Poe Way, Huntington, Indiana 46750
Permit Number: F069-32253-00084
Plt ID: 069-00084
Reviewer: Renee Traivaranon
Date: September 24, 2012

Limited Dry Formulation Process

Process	Unit ID	Pollutant	Emission Factor lb/ton	Limited Maximum Throughput tons/year	Limited Potential Emissions lb/year	Limited Potential Emissions tons/year
Rail Unloading*	DF-1A	PM	6.90E-03	25750	177.68	0.09
		PM10	3.30E-03		84.98	0.04
		PM2.5	3.30E-03		84.98	0.04
Truck Unloading*	DF-1B	PM	6.90E-03	25750	177.68	0.09
		PM10	3.30E-03		84.98	0.04
		PM2.5	3.30E-03		84.98	0.04
Conveyor	DF-2	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Bucket Elevator	DF-3	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Elevator Dump to Pile - Aggregate Material	DF-4	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Front-End Loader Dump	DF-5	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Floor Inlet with Conditioner - Wholesale	DF-6	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Wholesale Conveyor	DF-8	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.01
Wholesale Bucket Elevator	DF-10	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Wholesale Bucket Elevator Dump	DF-11	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Retail Bucket Elevator Dump to Bin	DF-13	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Truck Unloading - Product 4	DF-14	PM	0.544	51500	28016.00	14.01
		PM10	0.134		6901.00	3.45
		PM2.5	0.134		6901.00	3.45
Converor - Product 4	DF-15	PM	0.544	51500	28016.00	14.01
		PM10	0.134		6901.00	3.45
		PM2.5	0.134		6901.00	3.45
Bin Loading - Product 4	DF-16	PM	0.544	51500	28016.00	14.01
		PM10	0.134		6901.00	3.45
		PM2.5	0.134		6901.00	3.45
Skid Loader - Product 4	DF-17	PM	0.544	51500	28016.00	14.01
		PM10	0.134		6901.00	3.45
		PM2.5	0.134		6901.00	3.45
Skid Loader Dump - Product 4	DF-18	PM	0.544	51500	28016.00	14.01
		PM10	0.134		6901.00	3.45
		PM2.5	0.134		6901.00	3.45
Bucket Elevator Dump	DF-19	PM	0.544	51500	28016.00	14.01
		PM10	0.134		6901.00	3.45
		PM2.5	0.134		6901.00	3.45
Bucket Elevator Dump	DF-20	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Bin Dump - Wholesale	DF-21	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Bin Dump - Retail	DF-22	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Bin Dump - Retail Product 4	DF-23	PM	0.544	51500	28016.00	14.01
		PM10	0.134		6901.00	3.45
		PM2.5	0.134		6901.00	3.45
Blender - Retail	DF-24	PM	0.544	51500	28016.00	14.01
		PM10	0.134		6901.00	3.45
		PM2.5	0.134		6901.00	3.45
Bin Dump - Wholesale Loadout	DF-25	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Bin Dump - Retail Loadout	DF-26A	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Bin Dump - Retail Loadout - Product 4	DF-26B	PM	0.995	51500	51242.50	25.62
		PM10	0.278		14317.00	7.16
		PM2.5	0.278		14317.00	7.16
Storage Piles**	DF-27	PM	2.84E-07	51500	1.46E-02	7.31E-06
		PM10	1.34E-07		6.90E-03	3.45E-06
		PM2.5	2.03E-08		1.05E-03	5.23E-07
Total		**PM**				**140.35**
		PM10				**36.04**
		PM2.5				**28.80**

Emission Factors from AP-42, Fifth Edition, Volume I, Chapter 11.12, Table 11.12-2
* The Rail and Truck Unloading cannot operate simultaneously. 50% of the limited maximum throughput will be unloaded by truck and 50% unloaded by rail.

**Storage piles are considered sources of fugitive emissions. The potential fugitive emissions from the Storage Piles is limited to less than 25 tons per year because the Dry Formulation Process is limited to 50,000 tons of product per twelve (12) consecutive month period. Therefore, the storage piles are not subject to 326 IAC 6-5.

Methodology
Limited Potential Emissions (lb/year) = Emission Factor (lb/ton) x Limited Throughput (tons/year)
Limited Potential Emissions (tons/year) = Limited Potential Emissions (lb/year) x (1 ton/2000 pounds)

Note:

The Limited Emissions Table above is from FESOP 069-31771-00084, issued on May 30, 2012.

Appendix A: Emissions Calculations
Liquid Formulation Process

Company Name: Helena Chemical Company - Huntington Terminal
Address City IN Zip: 321 Thurman Poe Way, Huntington, Indiana 46750
Permit Number: F069-32253-00084
Plt ID: 069-00084
Reviewer: Renee Traivaranon
Date: September 24, 2012

Limited Liquid Formulation

Process	Emission Unit	Unit ID	Pollutant	Emission Factor lb/ton	Limited Maximum Throughput tons/hour	Limited Potential Emissions** lb/hour	Limited Potential Emissions** tons/year
Product 1	Hopper	FB-1	PM	6.90E-03	15	0.10	0.13
			PM10	3.30E-03		0.05	0.06
			PM2.5	3.30E-03		0.05	0.06
	Pneumatic Conveyor into Bin	FB-2	PM	0.72	15	10.80	14.04
			PM10	0.46		6.90	8.97
			PM2.5	0.46		6.90	8.97
	Auger to Blender	FB-3	PM	0.061	15	0.92	1.19
			PM10	0.034		0.51	0.66
			PM2.5	0.0058		0.09	0.11
	Belly Dump Conveyor - Hopper	FB-4	PM	6.90E-03	15	0.10	0.13
			PM10	3.30E-03		0.05	0.06
			PM2.5	3.30E-03		0.05	0.06
	Pneumatic Conveyor into Bin	FB-5	PM	0.72	15	10.80	14.04
			PM10	0.46		6.90	8.97
			PM2.5	0.46		6.90	8.97
	Auger into Blender	FB-6	PM	0.061	15	0.92	1.19
			PM10	0.034		0.51	0.66
			PM2.5	0.006		0.09	0.11
	Dump Super Sack Contents	FB-7	PM	6.90E-03	15	0.10	0.13
			PM10	3.30E-03		0.05	0.06
			PM2.5	3.30E-03		0.05	0.06
	Bucket Elevator Conveyance of Super Sack	FB-8	PM	6.90E-03	15	0.10	0.13
			PM10	3.30E-03		0.05	0.06
			PM2.5	3.30E-03		0.05	0.06
	Bucket Elevator Dump	FB-9	PM	6.90E-03	15	0.10	0.13
			PM10	3.30E-03		0.05	0.06
			PM2.5	3.30E-03		0.05	0.06
	Blender	FB-10	PM	0.554	15	8.31	10.80
			PM10	0.134		2.01	2.61
			PM2.5	0.134		2.01	2.61
Product 2	Hopper	FB-1	PM	6.90E-03	15	0.10	0.13
			PM10	3.30E-03		0.05	0.06
			PM2.5	3.30E-03		0.05	0.06
	Pneumatic Conveyor into Bin	FB-2	PM	0.72	15	10.80	14.04
			PM10	0.46		6.90	8.97
			PM2.5	0.46		6.90	8.97
	Auger to Blender	FB-11	PM	0.061	15	0.92	1.19
			PM10	0.034		0.51	0.66
			PM2.5	0.0058		0.09	0.11
	Dump Super Sack Contents	FB-12	PM	6.90E-03	15	0.10	0.13
			PM10	3.30E-03		0.05	0.06
			PM2.5	3.30E-03		0.05	0.06
	Bucket Elevator Conveyance of Super Sack	FB-13	PM	6.90E-03	15	0.10	0.13
			PM10	3.30E-03		0.05	0.06
			PM2.5	3.30E-03		0.05	0.06
	Bucket Elevator Dump	FB-14	PM	6.90E-03	15	0.10	0.13
			PM10	3.30E-03		0.05	0.06
			PM2.5	3.30E-03		0.05	0.06
	Blender	FB-15	PM	0.554	15	8.31	10.80
			PM10	0.134		2.01	2.61
			PM2.5	0.134		2.01	2.61
Product 3	Hopper	FB-1	PM	6.90E-03	15	0.10	0.13
			PM10	3.30E-03		0.05	0.06
			PM2.5	3.30E-03		0.05	0.06
	Pneumatic Conveyor into Bin	FB-2	PM	0.72	15	10.80	14.04
			PM10	0.46		6.90	8.97
			PM2.5	0.46		6.90	8.97
	Auger into Blender	FB-16	PM	0.061	15	0.92	1.19
			PM10	0.034		0.51	0.66
			PM2.5	0.0058		0.09	0.11
	Blender	FB-17	PM	0.554	15	8.31	10.80
			PM10	0.134		2.01	2.61
			PM2.5	0.134		2.01	2.61
Product 4	Dump Super Sack Contents	FB-18	PM	6.90E-03	15	0.10	0.13
			PM10	3.30E-03		0.05	0.06
			PM2.5	3.30E-03		0.05	0.06
	Bucket Elevator Conveyance of Super Sack	FB-19	PM	6.90E-03	15	0.10	0.13
			PM10	3.30E-03		0.05	0.06
			PM2.5	3.30E-03		0.05	0.06
	Bucket Elevator Dump	FB-20	PM	6.90E-03	15	0.10	0.13
			PM10	3.30E-03		0.05	0.06
			PM2.5	3.30E-03		0.05	0.06
	Blender	FB-21	PM	0.554	15	8.31	10.80
			PM10	0.134		2.01	2.61
			PM2.5	0.134		2.01	2.61
	Polyphosphate Blender*	FB-22	PM	0.15	15	2.25	2.93
			PM10	0.15		2.25	2.93
			PM2.5	0.15		2.25	2.93
			Fluorides	0.0012		0.02	0.02
Total			PM			83.70	108.80
			PM10			40.57	52.75
			PM2.5			38.88	50.55
			Fluorides			0.02	0.02

Emission Factors from AP-42, Fifth Edition, Volume I, Chapter 11.12, Table 11.12-2
* Polyphosphate Blender emission factors from a stack test from a similar unit permitted by Texas Committee on Environmental Quality
** Liquid Formulation Process is limited to less than 2600 operating hours per twelve (12) consecutive month period.

Methodology
Limited Potential Emissions (lb/hour) = Emission Factor (lb/ton) x Limited Maximum Throughput (ton/hour)
Limited Potential Emissions (tons/year) = Limited Potential Emissions (lb/hour) x 2600 (hour/year) x (1 ton/2000 lb)

Note:
The Limited Emissions Table above is from FESOP 069-31771-00084, issued on May 30, 2012.

Appendix A: Emissions Calculations
Natural Gas Combustion Only

Company Name: Helena Chemical Company - Huntington Terminal
Address City IN Zip: 321 Thurman Poe Way, Huntington, Indiana 46750
Permit Number: F069-32253-00084
Plt ID: 069-00084
Reviewer: Renee Traivaranon
Date: September 24, 2012

	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
Total	7.0	61.3

	Pollutant					
	PM*	PM10/PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.06	0.23	0.02	3.07	0.17	2.58

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

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

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	6.439E-05	3.679E-05	2.300E-03	5.519E-02	1.042E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.533E-05	3.373E-05	4.292E-05	1.165E-05	6.439E-05
				Total	**5.79E-02**

Methodology is the same as above.

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		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	3,679	0.1	0.1
Summed Potential Emissions in tons/yr	3,679		
CO2e Total in tons/yr	3,702		

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
Global 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

Note:
The Tables above are from FESOP 069-31771-00084, issued on May 30, 2012.

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: Helena Chemical Company - Huntington Terminal
Address City IN Zip: 321 Thurman Poe Way, Huntington, Indiana 46750
Permit Number: F069-32253-00084
Plt ID: 069-00084
Reviewer: Renee Traivaranon
Date: September 24, 2012

Unpaved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per hour per vehicle	Maximum trips per day (trip/hour)	Maximum Weight Loaded (tons/trip)	Total Weight driven per hour (ton/hr)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/hr)	Maximum one-way miles (miles/yr)
Tanks (Inbound)	1.0	2.7	2.7	1.3	3.4	2006	0.380	1.0	8986.0
Tanks (Outbound)	1.0	2.7	2.7	3.5	9.5	2006	0.380	1.0	8986.0
Dry Product Outbound (Entering Vehicles)	1.0	9.0	9.0	15.0	135.0	2692	0.510	4.6	40196.5
Dry Product Outbound (Exiting Vehicles)	1.0	9.0	9.0	25.0	225.0	2692	0.510	4.6	40196.5
Product Outbound (Entering Vehicles)	1.0	8.0	8.0	15.0	120.0	2270	0.430	3.4	30129.1
Product Outbound (Exiting Vehicles)	1.0	8.0	8.0	25.0	200.0	2270	0.430	3.4	30129.1
Product Receipt (Entering Vehicles)	1.0	5.3	5.3	40.0	212.0	2270	0.430	2.3	19960.5
Product Receipt (Exiting Vehicles)	1.0	5.3	5.3	25.0	132.5	2270	0.430	2.3	19960.5
X Product Receipt (Entering Vehicles)	1.0	9.0	9.0	40.0	360.0	2534	0.480	4.3	37837.2
X Product Receipt (Exiting Vehicles)	1.0	9.0	9.0	25.0	225.0	2534	0.480	4.3	37837.2
Product Loadout (Entering Vehicles)	1.0	0.2	0.2	40.0	8.0	2006	0.380	0.1	665.6
Product Loadout (Exiting Vehciles)	1.0	0.2	0.2	25.0	5.0	2006	0.380	0.1	665.6
Formulation to Warehouse (Entering Vehicles)	1.0	0.9	0.9	30.0	27.0	1584	0.300	0.3	2365.2
Warehouse to Formulation (Exiting Vehicles)	1.0	0.9	0.9	15.0	13.5	1584	0.300	0.3	2365.2
		Total	**70.2**		**1675.8**			**32.0**	**280280.2**

Average Vehicle Weight Per Trip = 23.9 tons/trip
Average Miles Per Trip = 0.46 miles/trip

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

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-3 Sand/Gravel Processing Plant Road)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2)
W =	23.9	23.9	23.9	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [(365 - P)/365]
Mitigated Emission Factor, Eext = E * [(365 - P)/365]
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	6.56	1.67	0.17	lb/mile
Mitigated Emission Factor, Eext =	4.31	1.10	0.11	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	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)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Ammonia Nurse Tanks (Inbound)	29.48	7.51	0.75	19.38	4.94	0.49	9.69	2.47	0.25
Ammonia Nurse Tanks (Outbound)	29.48	7.51	0.75	19.38	4.94	0.49	9.69	2.47	0.25
Dry Product Outbound (Entering Vehicles)	131.87	33.61	3.36	86.71	22.10	2.21	43.35	11.05	1.10
Dry Product Outbound (Exiting Vehicles)	131.87	33.61	3.36	86.71	22.10	2.21	43.35	11.05	1.10
Product Outbound (Entering Vehicles)	98.84	25.19	2.52	64.99	16.56	1.66	32.50	8.28	0.83
Product Outbound (Exiting Vehicles)	98.84	25.19	2.52	64.99	16.56	1.66	32.50	8.28	0.83
Product Receipt (Entering Vehicles)	65.48	16.69	1.67	43.06	10.97	1.10	21.53	5.49	0.55
Product Receipt (Exiting Vehicles)	65.48	16.69	1.67	43.06	10.97	1.10	21.53	5.49	0.55
X Product Receipt (Entering Vehicles)	124.13	31.64	3.16	81.62	20.80	2.08	40.81	10.40	1.04
X Product Receipt (Exiting Vehicles)	124.13	31.64	3.16	81.62	20.80	2.08	40.81	10.40	1.04
Ammonia Product Loadout (Entering Vehicles)	2.18	0.56	0.06	1.44	0.37	0.04	0.72	0.18	0.02
Ammonia Product Loadout (Exiting Vehciles)	2.18	0.56	0.06	1.44	0.37	0.04	0.72	0.18	0.02
Formulation to Warehouse (Entering Vehicles)	7.76	1.98	0.20	5.10	1.30	0.13	2.55	0.65	0.07
Warehouse to Formulation (Exiting Vehicles)	7.76	1.98	0.20	5.10	1.30	0.13	2.55	0.65	0.07
	919.49	**234.34**	**23.43**	**604.60**	**154.09**	**15.41**	**302.30**	**77.04**	**7.70**

Methodology

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

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

Note:
The Tables above are from FESOP 069-31771-00084, issued on May 30, 2012.

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
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TO: Jodi Heath
Helena Chemical Company-Huntington Terminal
321 Thurman Poe Way
Huntington, IN 46750

DATE: November 29, 2012

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

SUBJECT: Final Decision
FESOP
069-32253-00084

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

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

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

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

Final Applicant Cover letter.dot 11/30/07

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November 29, 2012

Huntington city Twp Public Library

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

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

Applicant Name: Helena Chemical Company – Huntington Terminal
Permit Number: 069-32253-00084

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	CDENNY 11/29/2012 Helena Chemical Company-Huntington Terminal 069-32253-00084 (final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

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2		Randy Parman VP Helena Chemical Company-Huntington Terminal 4546 Corporate Dr, suite 170 West Des Moines IA 50266 *(RO CAATS)*									
3		Huntington Town Council and Mayors Office 300 Cherry St. Huntington IN 46750 *(Local Official)*									
4		Huntington County Board of Commmissioners 354 N. Jefferson St. Suite 201 Huntington IN 46750 *(Local Official)*									
5		Huntington City Twp Public Library 200 W Market Huntington IN 46750-2655 *(Library)*									
6		Frederick & Iva Moore 6019 W 650 N Ligonier IN 46767 *(Affected Party)*									
7		Ms. Mary Shipley 10968 E 100 S Marion IN 46953 *(Affected Party)*									
8		Huntington County Health Department 354 N. Jefferson Street, Suite 201 Huntington IN 46750 *(Health Department)*									
9		Melvin & Deborah Gillespie 5616 N 200 E Huntington IN 46750 *(Affected Party)*									
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