



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: December 17, 2012

RE: MGPI of Indiana, LLC / 029-32386-00005

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

## Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot12/3/07



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December 17, 2012

Mr. Randy Graves  
MGPI of Indiana, LLC  
PO Box 7  
Lawrenceburg, IN 47025

Re: 029-32386-00005  
Administrative Amendment to  
Part 70 Renewal No.: T029-24407-00005

Dear Mr. Graves:

MGPI of Indiana, LLC was issued a Part 70 Operating Permit Renewal No. T029-24407-00005 on April 15, 2008 for a stationary distilled spirits production source. An application requesting an administrative amendment was received on October 5, 2012. MGPI of Indiana, LLC requested to add three (3) natural gas fired boilers with a heat capacity of 4.2 MMBTU/hr each. The potential to emit (PTE) is less than the exemption level for all pollutants. In accordance with 326 IAC 2-7-11(a)(8), because the additional units involve exempt units as described in 326 IAC 2-1.1-3 and the revision will not trigger a new applicable requirement, an administrative amendment will be issued.

Changes made to the Part 70 Operating Permit have been documented in the corresponding technical support document for this permit.

All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire Part 70 Operating Permit as modified has been provided with this letter.

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 Teresa Freeman at 317-234-1243 or at 1-800-451-6027 extension 4-1243.

Sincerely,

Jenny Acker, Section Chief  
Permits Branch  
Office of Air Quality

Attachments:

Updated Permit, TSD, Calcs  
Attachment A

JLA/tlf

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



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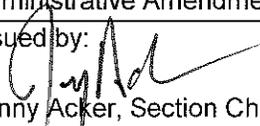
## Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**MGPI of Indiana, LLC**  
**7 Ridge Avenue**  
**Lawrenceburg, Indiana 47025**

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

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

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

Operation Permit No.: T029-24407-00005	
Issued by: / Original Signed by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: April 15, 2008  Expiration Date: April 15, 2013
Administrative Amendment No.: 029-26489-00005, issued on June 17, 2008 Administrative Amendment No.: 029-31206-00005, issued on December 28, 2011	
Administrative Amendment No.: 029-32386-00005	
Issued by:  Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 17, 2012  Expiration Date: April 15, 2013

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Certification  
Emergency Occurrence Report  
Part 70 Quarterly Reports  
Quarterly Deviation and Compliance Monitoring Report

Attachment A: 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary distilled spirits production source.

Source Address:	7 Ridge Avenue, Lawrenceburg, Indiana 47025
General Source Phone Number:	812-537-0700
SIC Code:	2085
County Location:	Dearborn
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD and Nonattainment NSR Rules Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]

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

- (a) One (1) pneumatic conveyor, identified as EU-11, installed prior to 1950, equipped with a dust collector, exhausting to Stack S-103, capacity: 28.0 tons of corn, rye, barley and/or malt per hour.
- (b) One (1) corn receiving and storage system, identified as EU-12, installed in 1997, consisting of the following equipment:
  - (1) One (1) unloading hopper, equipped with fabric filters for particulate matter control exhausting to Stack S-111, capacity: 196 tons of corn per hour.
  - (2) One (1) conveyor and bucket elevator, equipped with fabric filters for particulate matter control exhausting to Stack S-111, capacity: 196 tons of corn per hour.
  - (3) One (1) storage silo, equipped with fabric filters for particulate matter control, exhausting to Stack S-111, capacity: 75,000 bushels of corn.
  - (4) One (1) grain cleaner, equipped with fabric filters for particulate matter control, exhausting to Stack S-111, capacity: 26.6 tons of corn per hour.
  - (5) One (1) grain transport system, equipped with fabric filters for particulate matter control, exhausting to Stack S-112, capacity: 26.6 tons of corn per hour.

- (c) Seven (7) storage bins, collectively identified as EU-13, installed prior to 1950, equipped with fabric filters for particulate matter control, exhausting inside, five (5) with a capacity of 8,000 bushels, each and two (2) with a capacity of 4,000 bushels, each.
- (d) Six (6) hammermills, collectively identified as EU-14, installed prior to 1950, equipped with a baghouse for particulate matter control, exhausting inside, capacity: 109,760 pounds of grain per hour, total.
- (e) Three (3) multi-column stills and five (5) distillation columns, collectively identified as EU-20, installed prior to 1950, consisting of the following:
  - (1) One (1) spirits still (V-2), exhausting to Stack S-210, capacity: 583 proof gallons per hour,
  - (2) One (1) spirits still (V-3), exhausting to Stack S-210, capacity: 750 proof gallons per hour,
  - (3) One (1) spirits still (V-15), exhausting to Stack S-210, capacity: 3,750 proof gallons per hour;
  - (4) One (1) distillation column, exhausting to Stack S-211, and
  - (5) Four (4) unused distillation columns, exhausting to Stack S-211.
- (f) EU-21, consisting of the following units:
  - (1) Three (3) open fermenters, installed prior to 1950, exhausting to Stack S-201, capacity: 25,300 gallons, each.
  - (2) Five (5) open fermenters, installed in 2004, exhausting to Stack S-201, capacity: 27,854 gallons, each.
  - (3) Three (3) open fermenters, installed in 2005, exhausting to Stack S-201, capacity: 27,854 gallons, each.
  - (4) Three (3) open fermenters, installed in 2006, exhausting to Stack S-201, capacity: 27,854 gallons, each.
- (g) Twenty-four (24) closed fermenters, collectively identified as EU-22, installed prior to 1950, equipped with one (1) ethanol scrubber, exhausting to Stack S-202, capacity: 55,000 gallons, each.
- (h) Two (2) beer wells, identified as EU-23 and EU-24, installed prior to 1950, exhausting to Stacks S-203 and S-204 respectively, capacity: 38,886 and 102,098 gallons, respectively.
- (i) Three (3) beer stills, collectively identified as EU-25, installed prior to 1950, exhausting to Stack S-205, consisting of the following:
  - (1) Still #25, capacity: 4,600 gallons per hour,
  - (2) Still #26, capacity: 14,600 gallons per hour; and
  - (3) Still #31, capacity: 12,000 gallons per hour.

- (j) Two (2) column & kettles, collectively identified as EU-26, installed prior to 1950, exhausting to Stack S-206, capacity: 727 proof gallons per hour, each.
- (k) Three (3) gin stills (#10, #22, and #23), collectively identified as EU-27, installed prior to 1950, exhausting to Stack S-207, capacity: 600 proof gallons per hour, each.
- (l) One (1) doubler still, identified as EU-29, installed prior to 1950, exhausting to Stack S-209, capacity: 672 proof gallons per hour.
- (m) Four (4) paddle screens, collectively identified as EU-31, installed prior to 1950, exhausting to Stack S-301, capacity: 56,000 pounds per hour, each.
- (n) Five (5) rotary dryers, one (1) cooler and one (1) transport system, collectively identified as EU-32, installed prior to 1950, consisting of the following:
  - (1) Two (2) rotary dryers, exhausting to Stacks S-305 and S-306, each equipped with a wet scrubber, capacity: 25,500 pounds of grain per hour, each,
  - (2) Three (3) rotary dryers, exhausting to Stacks S-307 through S-309, each controlled by a wet scrubber, capacity: 14,500 pounds of grain per hour, each; and
  - (3) One (1) cooler and one (1) transport system, controlled by a cyclone, exhausting to Stack S- 310, capacity: 13,000 pounds of grain per hour.
- (o) Three (3) conveyors, collectively identified as EU-33, installed prior to 1950, exhausting to Stacks S-302 through S-304, capacity: 38,000 pounds of grain per hour, each.
- (p) One (1) DDG (Distillers Dried Grain) loadout system, installed in 1997, consisting of the following:
  - (1) Two (2) storage silos, and two (2) surge hoppers, collectively identified as EU-34, equipped with two (2) dust collectors, exhausting to Stacks S-341 through S-344, capacity: 13,100 cubic feet, total for the two (2) storage silos, each and 14,000 pounds of grain per hour, each, for the two (2) surge hoppers.
  - (2) One (1) air transport system and scale to the rail car loading area, identified as EU-35, controlled by a dust collector, exhausting to Stack S-350, capacity: 14,000 pounds of grain per hour.
  - (3) One (1) air transport system and scale to the truck loading area, identified as EU-36, controlled by a dust collector, exhausting to Stack S-360, capacity: 14,000 pounds of grain per hour.
  - (4) One (1) rail car loader, identified as EU-37, exhausting to Stack S-370, capacity: 14,000 pounds of grain per hour.
  - (5) One (1) truck loader, identified as EU-38, exhausting to Stack S-380, capacity: 14,000 pounds of grain per hour.
- (q) One (1) wine room, identified as EU-41, consisting of forty-three (43) organic liquid storage tanks, installed prior to 1950, exhausting to Stack S-410, capacity: 524,504 gallons of ethanol, total and a throughput of 32,000,000 proof gallons per year, total, consisting of the following:

- (1) Thirty-five (35) organic liquid storage tanks, installed prior to 1950, capacity: 467,518 gallons of ethanol, total.
- (2) Eight (8) organic liquid storage tanks, installed in 1988, capacity: 56,986 gallons of ethanol, total.
- (r) One (1) tank farm, identified as EU-42, consisting of nine (9) organic liquid storage tanks, installed prior to 1950, exhausting to Stack S-420, capacity: 750,000 gallons of ethanol, each.
- (s) EU-43, consisting of the following units:
  - (1) One (1) Bldg 88, consisting of twenty-seven (27) organic liquid storage tanks, installed in 1989, exhausting to Stack S-430, capacity: 489,250 gallons of ethanol, total.
  - (2) One (1) rum handling area, installed in 1997, exhausting to the atmosphere, capacity: 3,501,429 gallons of rum.
- (t) One (1) regauge tank area, identified as EU-44, consisting of fifty-six (56) tanks, installed in 1960, exhausting to Stack S-440, capacity: 592,362 gallons of ethanol, total.
- (u) One (1) mini tank farm, identified as EU-45, consisting of eight (8) tanks:
  - (1) Seven organic liquid storage (7) tanks, installed in 1989, exhausting to Stack S-435, capacity: 779,800 gallons of ethanol, total.
  - (2) One (1) organic liquid storage tank, installed in 1994, capacity: 3,500 gallons of ethanol.
- (v) One (1) bottling tank room, identified as EU-51, consisting of forty-five (45) organic liquid storage tanks, with a total capacity of 452,000 gallons of ethanol, consisting of the following:
  - (1) Forty-one (41) organic liquid storage tanks, installed in 1969, exhausting to Stack S-510 and
  - (2) Four (4) organic liquid storage tanks, installed in 2003, exhausting to Stack S-510.
- (w) Seven (7) bottling lines, and one (1) 50-ml bottling line, collectively identified as EU-52, installed prior to 1950 and modified in 2003, exhausting to Stack S-520, capacity: 452,000 gallons of ethanol.
- (x) One (1) cooler operation, identified as EU-53, installed prior to 1988, exhausting to Stack S-530, capacity: 2,187 cases per hour.
- (y) One (1) barrel filling and emptying operation, identified as EU-61, installed prior to 1950, exhausting to Stack S-610, with a throughput capacity of 13,000,000 proof gallons and 12,775,000 proof gallons of whiskey and gin per year, respectively, and a maximum capacity of 29,700 gallons of whiskey and gin per hour .
- (z) One (1) Warehouse C, identified as EU-71, installed prior to 1950, exhausting to Vent 701, capacity: 69,306 barrels.

- (aa) One (1) Warehouse E, identified as EU-72, installed prior to 1950, exhausting to Vent 702, capacity: 101,032 barrels.
- (bb) One (1) Warehouse G, identified as EU-73, installed prior to 1950, exhausting to Vent 703, capacity: 84,097 barrels.
- (cc) One (1) Warehouse J & M, identified as EU-74, installed prior to 1950, exhausting to Vent 704, capacity: 100,000 barrels.
- (dd) One (1) Warehouse L, identified as EU-75, installed prior to 1950, exhausting to Vent 705, capacity: 93,438 barrels.
- (ee) One (1) Warehouse N, identified as EU-76, installed prior to 1950, exhausting to Vent 706, capacity: 93,405 barrels.
- (ff) One (1) steam boiler, identified as EU-96, installed in 1977, using coal-based alternative fuels (CBAF), coal, natural gas, #6 fuel oil, and/or wood, equipped with an electrostatic precipitator for particulate matter control, exhausting to Stack S-906, heat input capacity: 244 million British thermal units per hour.
- (gg) One (1) natural gas fired steam boiler, identified as EU-97, using #2 fuel oil as back-up, installed in 1992, exhausting to Stack S-907, heat input capacity: 47.6 million British thermal units per hour using natural gas and 45.6 million British thermal units using #2 fuel oil. Under 40 CFR 60, Subpart Dc, this facility is considered an industrial, institutional, or commercial boiler.
- (hh) One (1) loading rack system, consisting of four (4) rail car and four (4) truck loading racks, identified as EU-46, installed in 1989, exhausting to the atmosphere, capacity: 31,000,000 gallons of ethanol per year.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(14)]

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour [326 IAC 6-3-2].
- (b) Three (3) natural gas fired boilers with a heat input of capacity of 4.2 MMBtu/hr each, approved in 2012 for installation.. [326 IAC 6-2-4]
- (c) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3-2].

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);

- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B GENERAL CONDITIONS**

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

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

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

- (a) This permit, T029-24407-00005, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

and

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

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

- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (12)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) The Permittee shall maintain and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Southeast Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to

be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T029-24407-00005 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b) or (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 2-7-20(b)(1) and (c)(1).

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

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

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

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

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

#### C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

- (g) Indiana Licensed Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

#### C.7 Performance Testing [326 IAC 3-6]

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- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

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

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

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Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and

operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

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

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

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

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

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

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

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

**C.12 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]**

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

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

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

- (a) The Permittee shall take a reasonable response step(s) 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 a reasonable response step(s) shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response step(s) taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

#### **C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

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

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

The statement must be submitted to:

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.
- (c) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or

40 CFR 51.166(r)(6)(vi)(b)) that a “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

- (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:
  - (A) A description of the project.
  - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
  - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
    - (i) Baseline actual emissions;
    - (ii) Projected actual emissions;
    - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and
    - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
  - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
  - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

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

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:
- Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(ww) and/or 326 IAC 2-3-1(pp), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

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

Reports required in this part shall be submitted to:

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

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

### **Stratospheric Ozone Protection**

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

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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**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(14)] Grain Handling, Fermentation, and Distillation**

- (a) One (1) pneumatic conveyor, identified as EU-11, installed prior to 1950, equipped with a dust collector, exhausting to Stack S-103, capacity: 28.0 tons of corn, rye, barley and/or malt per hour.
- (b) One (1) corn receiving and storage system, identified as EU-12, installed in 1997, consisting of the following equipment:
  - (1) One (1) unloading hopper, equipped with fabric filters for particulate matter control exhausting to Stack S-111, capacity: 196 tons of corn per hour.
  - (2) One (1) conveyor and bucket elevator, equipped with fabric filters for particulate matter control exhausting to Stack S-111, capacity: 196 tons of corn per hour.
  - (3) One (1) storage silo, equipped with fabric filters for particulate matter control, exhausting to Stack S-111, capacity: 75,000 bushels of corn.
  - (4) One (1) grain cleaner, equipped with fabric filters for particulate matter control, exhausting to Stack S-111, capacity: 26.6 tons of corn per hour.
  - (5) One (1) grain transport system, equipped with fabric filters for particulate matter control, exhausting to Stack S-112, capacity: 26.6 tons of corn per hour.
- (c) Seven (7) storage bins, collectively identified as EU-13, installed prior to 1950, equipped with fabric filters for particulate matter control, exhausting inside, five (5) with a capacity of 8,000 bushels, each and two (2) with a capacity of 4,000 bushels, each.
- (d) Six (6) hammermills, collectively identified as EU-14, installed prior to 1950, equipped with a baghouse for particulate matter control, exhausting inside, capacity: 109,760 pounds of grain per hour, total.
- (e) Three (3) multi-column stills and five (5) distillation columns, collectively identified as EU-20, installed prior to 1950, consisting of the following:
  - (1) One (1) spirits still (V-2), exhausting to Stack S-210, capacity: 583 proof gallons per hour,
  - (2) One (1) spirits still (V-3), exhausting to Stack S-210, capacity: 750 proof gallons per hour,
  - (3) One (1) spirits still (V-15), exhausting to Stack S-210, capacity: 3,750 proof gallons per hour;
  - (4) One (1) distillation column, exhausting to Stack S-211, and
  - (5) Four (4) unused distillation columns, exhausting to Stack S-211.
- (f) EU-21, consisting of the following units:
  - (1) Three (3) open fermenters, installed prior to 1950, exhausting to Stack S-201, capacity: 25,300 gallons, each.
  - (2) Five (5) open fermenters, installed in 2004, exhausting to Stack S-201, capacity: 27,854 gallons, each.

- (3) Three (3) open fermenters, installed in 2005, exhausting to Stack S-201, capacity: 27,854 gallons, each.
- (4) Three (3) open fermenters, installed in 2006, exhausting to Stack S-201, capacity: 27,854 gallons, each.
- (g) Twenty-four (24) closed fermenters, collectively identified as EU-22, installed prior to 1950, equipped with one (1) ethanol scrubber, exhausting to Stack S-202, capacity: 55,000 gallons, each.
- (h) Two (2) beer wells, identified as EU-23 and EU-24, installed prior to 1950, exhausting to Stacks S-203 and S-204 respectively, capacity: 38,886 and 102,098 gallons, respectively.
- (i) Three (3) beer stills, collectively identified as EU-25, installed prior to 1950, exhausting to Stack S-205, consisting of the following:
  - (1) Still #25, capacity: 4,600 gallons per hour,
  - (2) Still #26, capacity: 14,600 gallons per hour; and
  - (3) Still #31, capacity: 12,000 gallons per hour.
- (j) Two (2) column & kettles, collectively identified as EU-26, installed prior to 1950, exhausting to Stack S-206, capacity: 727 proof gallons per hour, each.
- (k) Three (3) gin stills (#10, #22, and #23), collectively identified as EU-27, installed prior to 1950, exhausting to Stack S-207, capacity: 600 proof gallons per hour, each.
- (l) One (1) doubler still, identified as EU-29, installed prior to 1950, exhausting to Stack S-209, capacity: 672 proof gallons per hour.
- (m) Four (4) paddle screens, collectively identified as EU-31, installed prior to 1950, exhausting to Stack S-301, capacity: 56,000 pounds per hour, each.
- (n) Five (5) rotary dryers, one (1) cooler and one (1) transport system, collectively identified as EU-32, installed prior to 1950, consisting of the following:
  - (1) Two (2) rotary dryers, exhausting to Stacks S-305 and S-306, each equipped with a wet scrubber, capacity: 25,500 pounds of grain per hour, each,
  - (2) Three (3) rotary dryers, exhausting to Stacks S-307 through S-309, each controlled by a wet scrubber, capacity: 14,500 pounds of grain per hour, each; and
  - (3) One (1) cooler and one (1) transport system, controlled by a cyclone, exhausting to Stack S-310, capacity: 13,000 pounds of grain per hour.
- (o) Three (3) conveyors, collectively identified as EU-33, installed prior to 1950, exhausting to Stacks S-302 through S-304, capacity: 38,000 pounds of grain per hour, each.
- (p) One (1) DDG (Distillers Dried Grain) loadout system, installed in 1997, consisting of the following:
  - (1) Two (2) storage silos, and two (2) surge hoppers, collectively identified as EU-34, equipped with two (2) dust collectors, exhausting to Stacks S-341 through S-344, capacity: 13,100 cubic feet, total for the two (2) storage silos, each and 14,000 pounds of grain per hour, each, for the two (2) surge hoppers.

- (2) One (1) air transport system and scale to the rail car loading area, identified as EU-35, controlled by a dust collector, exhausting to Stack S-350, capacity: 14,000 pounds of grain per hour.
  - (3) One (1) air transport system and scale to the truck loading area, identified as EU-36, controlled by a dust collector, exhausting to Stack S-360, capacity: 14,000 pounds of grain per hour.
  - (4) One (1) rail car loader, identified as EU-37, exhausting to Stack S-370, capacity: 14,000 pounds of grain per hour.
  - (5) One (1) truck loader, identified as EU-38, exhausting to Stack S-380, capacity: 14,000 pounds of grain per hour.
- (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

**D.1.1 Particulate [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the following emission units and control devices shall not exceed the pounds per hour limitation when operating at the stated process weight rates calculated using the following equations:

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

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

or

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

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

<b>Emission Unit (baghouse)</b>	<b>Process weight rate (tons per hour)</b>	<b>Allowable particulate emission rate (pounds per hour)</b>
EU-11	28.0	38.2
EU-12	446	67.6
EU-13	224	59.7
EU-14	54.9	45.4
EU-32	53.8	45.3
EU-34	21.0	31.5
EU-35	7.00	15.1
EU-36	7.00	15.1
EU-37	7.00	15.1

<b>Emission Unit (baghouse)</b>	<b>Process weight rate (tons per hour)</b>	<b>Allowable particulate emission rate (pounds per hour)</b>
EU-38	7.00	15.1

**D.1.2 PSD Minor Limit [326 IAC 2-2]**

Pursuant to CP 029-6331-00005 issued March 14, 1997:

- (a) The PM and PM<sub>10</sub> emissions from the corn truck unloading hopper, grain receiving elevator and conveyor, corn storage silo, and grain cleaner, which are part of EU-12, shall be limited to 1.20 pounds per hour.
- (b) The PM and PM<sub>10</sub> emissions from the grain air transport system, which is part of EU-12, shall be limited to 0.219 pounds per hour.
- (c) The PM and PM<sub>10</sub> emissions from the two (2) storage silos and the two (2) surge hoppers, collectively identified as EU-34, shall be limited to 0.136 pounds per hour.
- (d) The PM and PM<sub>10</sub> emissions from one (1) air transport system and scale to the rail car loading area, identified as EU-35, and the one (1) air transport system and scale to the truck loading area, identified as EU-36, shall be limited to 0.289 pounds per hour.
- (e) The PM and PM<sub>10</sub> emissions from one (1) rail car loader, identified as EU-37 the truck loader, identified as EU-38, shall be limited to 1.25 pounds per hour.

Compliance with these limitations shall render the requirements of 326 IAC 2-2, PSD, not applicable.

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

**D.1.3 Particulate Control [326 IAC 2-7-6(6)]**

- (a) In order to ensure compliance with Condition D.1.1, the baghouses for particulate control shall be in operation and control emissions from EU-12 and EU-34 through EU-36, at all times that the facilities are in operation.
- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

## **Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)] [40 CFR 64]**

### **D.1.4 Visible Emissions Notations**

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- (a) Visible emission notations of EU-12 and EU-34 through EU-36 stack exhausts (S-104, S-111, S-112, S-341 through S-344, S-350, and S-360) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response step(s). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response step(s) required by this condition. Failure to take a response step(s) shall be considered a deviation from this permit.

### **D.1.5 Baghouse Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

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- (a) The Permittee shall record the pressure drop across the baghouses used in conjunction with EU-12 and EU-34 through EU-36 at least once per day when the emissions units are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 to 5.5 inches of water for EU-12 and EU-34 through EU-36, or until a new range is established during the latest stack test, the Permittee shall take a reasonable response step(s). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response step(s) required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take a response step(s) shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

### **D.1.6 Baghouse Inspections**

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An inspection shall be performed semi-annually of all bags controlling EU-12. All defective bags shall be replaced.

### **D.1.7 Broken or Failed Bag Detection - Multi-Compartment Baghouse**

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In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

## **Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.1.8 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.1.4, the Permittee shall maintain a daily record of visible emission notations of the grain processing facilities stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the grain processing facilities did not operate that day).
- (b) To document the compliance status with Condition D.1.5, the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the grain processing facilities. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the grain processing facilities did not operate that day).
- (c) To document the compliance status with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6. The Permittee shall include in its daily record when an inspection is not performed and the reason for a lack of inspection (e.g., the process did not operate during the semi-annual period).
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(14)]: Steam Boiler, identified as EU-96

- (ff) One (1) steam boiler, identified as EU-96, installed in 1977, using coal-based alternative fuels (CBAF), coal, natural gas, #6 fuel oil, and/or wood, equipped with an electrostatic precipitator for particulate matter control, exhausting to Stack S-906, heat input capacity: 244 million British thermal units per hour.

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

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

#### D.2.1 Particulate [326 IAC 6.5-3]

Pursuant to 326 IAC 6.5-3-8 (Particulate Matter Emissions for Dearborn County), the steam boiler, identified as EU-96, shall comply with the following requirements:

- (a) The PM emissions shall be limited 0.180 pounds of PM per million British thermal units.
- (b) The PM emissions shall be limited to two hundred fourteen and two-tenths (214.2) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The throughput to the steam boiler, identified as EU-96, shall be limited to 85,096 tons of coal per twelve (12) consecutive month period with compliance determined at the end of each month.
- (d) The minimum overall PM control efficiency for the electrostatic precipitator on this boiler shall not be less than 94.4% to comply with this limit when firing coal, CBAF or wood. For purposes of showing compliance with this fuel limit, the following equivalencies shall be used:
  - (1) One (1) million cubic feet of natural gas is equivalent to 0.021 tons of coal,
  - (2) One (1) kilogallon of No. 6 fuel oil is equivalent to 0.138 tons of coal, and
  - (3) One (1) ton of wood is equivalent to 0.056 tons of coal.

#### D.2.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-4-13]

Pursuant to 326 IAC 7-4-13 (Dearborn County sulfur dioxide emissions limitations), the SO<sub>2</sub> emissions from the steam boiler, identified as EU-96, shall not exceed 1.92 pounds per million British thermal units heat input while combusting coal and/or No. 6 fuel oil.

### Compliance Determination Requirements

#### D.2.3 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6]

Pursuant to 326 IAC 7-4-13, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed 1.92 pounds per mmBtu. Compliance shall be determined utilizing (a) or (b) below for coal firing or (c), (d), or (e) for fuel oil firing:

- (a) Sampling and analyzing the coal using one of the following procedures:
  - (1) Minimum Coal Sampling Requirements and Analysis Methods:

- (A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;
  - (B) Coal shall be sampled at least one (1) time per day;
  - (C) Minimum sample size shall be five hundred (500) grams;
  - (D) Samples shall be composited and analyzed at the end of each calendar quarter;
  - (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or
- (2) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) above. [326 IAC 7-2-1(b)]

A determination of noncompliance pursuant to any of the methods specified in (a) and (b) above shall not be refuted by evidence of compliance pursuant to the other method.

- (c) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or
- (d) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
  - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted.
  - (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (e) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the one (1) steam boiler, identified as EU-96, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (c) or (d) above shall not be refuted by evidence of compliance pursuant to the other method.

#### D.2.4 Testing Requirements [326 IAC 2-7-6(1,6)] [326 IAC 2-1.1-11]

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In order to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM testing of the steam boiler, identified as EU-96, utilizing methods as approved by the Commissioner at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

#### D.2.5 Particulate Control [326 IAC 2-7-6(6)]

In order to ensure compliance with Condition D.2.1, the electrostatic precipitator for particulate control shall be in operation and control emissions from the steam boiler, identified as EU-96, at all times that the boiler is in operation and is firing coal, CBAF, or wood.

#### **Compliance Assurance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 64]**

#### D.2.6 Continuous Opacity Monitors

Pursuant to 326 IAC 5-1-2 and 326 IAC 5-1-3, opacity from EU-96 shall comply with the following requirements:

- (a) The Permittee shall continuously operate the opacity monitoring devices on EU-96, in accordance with the requirements of Condition D.2.7 to ensure compliance with the opacity limits of Condition C.1 (Opacity).
- (b) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period.
- (c) 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.
- (d) When building a new fire in a boiler, or shutting down a boiler, capacity may exceed the applicable limit; however, opacity levels shall not exceed sixty percent (60%) for any six (6) minute averaging period. Opacity in excess of the applicable limit shall not continue for more than two (2) six (6) minute averaging periods in any twenty-four (24) hour period.
- (e) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes or the airheater, opacity may exceed the applicable opacity limit; however, opacity shall not exceed sixty percent (60%) for any six (6) minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6) minute averaging period in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6) minute averaging periods in a twelve (12) hour period.

#### D.2.7 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment. For a boiler, the COMS shall be in operation at all times that the induced draft fan is in operation except when firing natural gas.
- (b) All COMS shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5.
- (c) In the event that a breakdown of a COMS occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (d) Whenever a COMS is malfunctioning or is down for maintenance or repairs for a period of twenty-four (24) hours or more and a backup COMS is not online within twenty-four (24) hours of shutdown or malfunction of the primary COMS, the Permittee shall provide a certified opacity reader, who may be an employee of the Permittee or an independent contractor, to self-monitor the emissions from the emission unit stack.

- (1) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time.
  - (2) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least twice per day during daylight operations, with at least four (4) hours between each set of readings, until a COMS is online.
  - (3) Method 9 readings may be discontinued once a COMS is online.
  - (4) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.
  - (5) Method 9 readings will not be required if the unit is firing natural gas while a COMS is offline.
- (e) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5 and 40 CFR 60.

#### D.2.8 Opacity Readings [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

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- (a) In the event of emissions exceeding twenty percent (20%) average opacity for three (3) consecutive six (6) minute averaging periods, the Permittee shall take a reasonable response step(s). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response step(s) required by this condition. Opacity readings in excess of twenty percent (20%) for three (3) consecutive six (6) minute averaging periods but not exceeding the opacity limit for the unit are not a deviation from this permit. Failure to take a response step(s) shall be considered a deviation from this permit.
- (b) The Permittee may request that the IDEM, OAQ approve a different opacity trigger level than the one specified in (a) of this condition, provided the Permittee can demonstrate, through stack testing or other appropriate means, that a different opacity trigger level is appropriate for monitoring compliance with the applicable particulate matter mass emission limits.

#### D.2.9 Parametric Monitoring

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- (a) The ability of the electrostatic precipitator to control particulate emissions shall be monitored once per day, when the unit is in operation, by measuring and recording the primary and secondary voltages and the currents of the transformer-rectifier (T-R) sets.
- (b) When for any one reading, operation is outside one of the normal ranges shown below, or until a new range is established during the latest stack test, the Permittee shall take a reasonable response step(s). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response step(s) required by this condition. A reading outside of the above mentioned ranges is not a deviation from this permit. Failure to take a response step(s) shall be considered a deviation from this permit.
  - (1) Primary voltage: 70-385 V
  - (2) Secondary voltage: 10-55 kV
  - (3) T-R set primary current: 15-150 A

- (c) The instrument used for determining the T-R set voltage shall be subject to approval by IDEM, OAQ.

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

#### **D.2.10 Record Keeping Requirements**

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- (a) To document the compliance status with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and SO<sub>2</sub> emission limits established in Conditions D.2.1 and D.2.2.
- (1) Calendar dates covered in the compliance determination period;
  - (2) Actual coal usage since last compliance determination period;
  - (3) Sulfur content, heat content, and ash content; and;
  - (4) Sulfur dioxide emission rates.
- (b) To document the compliance status with Conditions D.2.6, D.2.7, and D.2.8, the Permittee shall maintain records of the continuous opacity monitor for the steam boiler, identified as EU-96, stack exhaust while combusting coal-based alternative fuel (CBAF), No. 6 fuel oil, or wood.
- (c) To document the compliance status with Condition D.2.9, the Permittee shall maintain records of the primary and secondary voltages and the currents of the transformer-rectifier (T-R) sets.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

#### **D.2.11 Reporting Requirements**

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A quarterly summary of the information to document the compliance status with Condition D.2.1(b) shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(14)] Steam Boiler EU-97

(gg) One (1) natural gas fired steam boiler, identified as EU-97, using #2 fuel oil as back-up, installed in 1992, exhausting to Stack S-907, heat input capacity: 47.6 million British thermal units per hour using natural gas and 45.6 million British thermal units using #2 fuel oil. Under 40 CFR 60, Subpart Dc, this facility is considered an industrial, institutional, or commercial boiler.

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

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

#### D.3.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the PM emissions from the steam boiler, identified as EU-97 shall not exceed:

- (1) 0.399 lbs/mmBtu when combusting natural gas, or
- (2) 0.404 lbs/mmBtu when combusting No. 2 fuel oil.

These limitations were calculated using the following equation:

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

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used. Q = 47.6 mmBtu/hr when combusting natural gas and 45.6 mmBtu/hr when combusting No. 2 fuel oil.

#### D.3.2 Fuel Oil Limit [326 IAC 2-2] [326 IAC 7-1.1-2]

- (a) Pursuant to CP 029-2159-00005, issued on February 10, 1992, the steam boiler, identified as EU-97, shall be limited to 1,848,000 gallons of No. 2 fuel oil per twelve (12) consecutive month period, with compliance determined at the end of each month, and no fuel shall be combusted than contains greater than 0.3% sulfur.
- (b) The SO<sub>2</sub> emissions from the steam boiler, identified as EU-97, when combusting No. 2 fuel oil, shall not exceed 0.043 pounds of SO<sub>2</sub> per gallon of No. 2 fuel oil.

Compliance with these limitations shall limit the SO<sub>2</sub> emissions from the steam boiler, identified as EU-97, to 39.9 tons per year, and render the requirements of 326 IAC 2-2, PSD, not applicable. This will also satisfy the requirements of 326 IAC 7-1.1-2, Sulfur Dioxide Emissions Limitations.

#### D.3.3 Sulfur Dioxide Emissions Limitations [326 IAC 7-1.1-2]

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Pursuant to 326 IAC 7-1.1-2(a)(3), the sulfur dioxide emissions from the steam boiler, identified as EU-97, shall not exceed five-tenths (0.5) pounds per mmBtu.

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

#### D.3.4 Visible Emissions Notations

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- (a) Visible emission notations of the steam boiler, identified as EU-97, stack exhaust (S-907) shall be performed once per day during normal daylight operations when burning No.2 fuel oil. 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 a reasonable response step(s). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response step(s) required by this condition. Failure to take a response step(s) shall be considered a deviation from this permit.

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

#### D.3.5 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.3.4, the Permittee shall maintain a daily record of visible emission notations of the steam boiler, identified as EU-97, stack exhaust. 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 boiler did not operate that day).
- (b) To document the compliance status with Conditions D.3.1 and D.3.2 and 326 IAC 12, the Permittee shall record and maintain records of the amounts of each fuel combusted during each day for the one (1) boiler, identified as EU-97.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

#### D.3.6 Reporting Requirements

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A quarterly summary of the information to document the compliance status with Condition D.3.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reports required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour [326 IAC 6-3-2].
- (b) Three (3) natural gas fired boilers with a heat input of capacity of 4.2 mMBTU/hr each, approved in 2012 for installation. [326 IAC 6-2-4.
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3-2].

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

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

#### D.4.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the particulate emissions from the natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour and grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations shall be limited by the following equation:

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

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

#### D.4.2 Particulate Emissions Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the three natural gas fired boilers shall be limited to 0.38 pounds per MMBtu.

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

where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input  
Q = Total source maximum operating capacity rating in MMBtu/hr heat input.

Total maximum operating capacity (Q) of all indirect heating facilities constructed after September 21, 1983, (EU-97 and three natural gas fired boilers) is 60.2 MMBtu/hr.

## SECTION E.1 NSPS Subpart Dc FACILITY OPERATION CONDITIONS

### NSPS Subpart Dc

(gg) One (1) natural gas fired steam boiler, identified as EU-97, using #2 fuel oil as back-up, installed in 1992, exhausting to Stack S-907, heat input capacity: 47.6 million British thermal units per hour using natural gas and 45.6 million British thermal units using #2 fuel oil. Under 40 CFR 60, Subpart Dc, and 40 CFR 63, this facility is considered an industrial, institutional, or commercial boiler.

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

#### E.1.1 General Provisions Relating to NSPS, Subpart Dc [326 IAC 12-1] [40 CFR Part 60, Subpart A]

(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1-1 for the one steam boiler, identified as EU-97.

(b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports 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

#### E.1.2 Small Industrial-Commercial-Institutional Steam Generating Units NSPS [40 CFR Part 60, Subpart Dc] [326 IAC 12]

The Permittee which operates an industrial steam generating unit shall comply with the following provisions of 40 CFR 60, Subpart Dc, which are incorporated by reference as 326 IAC 12 (included as Attachment A of this permit):

- (1) 40 CFR 60.40c(a)-(d)
- (2) 40 CFR 60.41c
- (3) 40 CFR 60.42c(d), (e)(2), (f), (g), (h)(1), (i), (j)
- (4) 40 CFR 60.43c(c), (d)
- (5) 40 CFR 60.44c(a)-(e), (g), (j)
- (6) 40 CFR 60.45c(a), (c)
- (7) 40 CFR 60.46c(d)-(f)
- (8) 40 CFR 60.47c(a), (b), (d)
- (9) 40 CFR 60.48c(a)-(d), (f)(1), (g)-(j)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: MGPI of Indiana, LLC  
Source Address: 7 Ridge Avenue, Lawrenceburg, Indiana 47025  
Part 70 Permit No.: T 029-24407-00005

<b>This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.</b>	
Please check what document is being certified:	
<input type="checkbox"/>	Annual Compliance Certification Letter
<input type="checkbox"/>	Test Result (specify) _____
<input type="checkbox"/>	Report (specify) _____
<input type="checkbox"/>	Notification (specify) _____
<input type="checkbox"/>	Affidavit (specify) _____
<input type="checkbox"/>	Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature: _____
Printed Name: _____
Title/Position: _____
Phone: _____
Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
100 North Senate Avenue  
MC61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: MGPI of Indiana, LLC  
Source Address: 7 Ridge Avenue, Lawrenceburg, Indiana 47025  
Part 70 Permit No.: T 029-24407-00005

**This form consists of 2 pages**

**Page 1 of 2**

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>• 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</li><li>• 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.</li></ul>
--

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 <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**Part 70 Quarterly Report**

Source Name: MGPI of Indiana, LLC  
 Source Address: 7 Ridge Avenue, Lawrenceburg, Indiana 47025  
 Part 70 Permit No.: T 029-24407-00005  
 Facility: One (1) steam boiler, identified as EU-96  
 Parameter: Amount of coal burned or equivalent  
 Limit: 85,096 tons of coal per twelve (12) consecutive month period, equivalent to 214.2 tons of PM per year, with compliance determined at the end of each month.

For purposes of showing compliance with this fuel limit, the following equivalencies shall be used: one (1) million cubic feet of natural gas is equivalent to 0.021 tons of coal, one kilogallon of No. 6 fuel oil is equivalent to 0.138 tons of coal, and one (1) ton of wood is equivalent to 0.056 tons of coal.

YEAR: \_\_\_\_\_

Month	Coal burned or equivalent (tons)	Coal burned or equivalent (tons)	Coal burned or equivalent (tons)
	This Month	Previous 11 Months	12 Month Total

- 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**

**Part 70 Quarterly Report**

Source Name: MGPI of Indiana, LLC  
Source Address: 7 Ridge Avenue, Lawrenceburg, Indiana 47025  
Part 70 Permit No.: T 029-24407-00005  
Facility: One (1) steam boiler, identified as EU-97  
Parameter: #2 Fuel Oil Burned  
Limit: 1,848,000 gallons per twelve (12) consecutive month period, equivalent to SO<sub>2</sub> emissions of 39.9 tons per year, with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	#2 Fuel Oil (gallons)	#2 Fuel Oil (gallons)	# 2 Fuel Oil (gallons)
	This Month	Previous 11 Months	12 Month Total

- 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**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: MGPI of Indiana, LLC  
Source Address: 7 Ridge Avenue, Lawrenceburg, Indiana 47025  
Part 70 Permit No.: T 029-24407-00005

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

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

<b>Permit Requirement (specify permit condition #)</b>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Step(s) Taken:</b>	
<b>Permit Requirement (specify permit condition #)</b>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Step(s) Taken:</b>	
<b>Permit Requirement (specify permit condition #)</b>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Step(s) Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

# Indiana Department of Environmental Management Office of Air Quality

## Technical Support Document (TSD) for an Administrative Amendment to a Part 70 Permit.

### Source Description and Location

Source Name:	MGPI of Indiana, LLC
Source Location:	7 Ridge Avenue, Lawrenceburg, Indiana 47025
County:	Dearborn
SIC Code:	2085
Permit Renewal No.:	T 029-24407-00005
Operation Permit Issuance Date:	April 15, 2008
Administrative Amendment No.:	029-32386-00005
Permit Reviewer:	Teresa Freeman

### Existing Approvals

The source was issued Part 70 Operating Permit No. T 029-24407-00005 on April 15, 2008, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment 029-26489-00005, issued on June 17, 2008; and
- (b) Administrative Amendment 029-31206-00005, issued on December 28, 2011,

### County Attainment Status

The source is located in Dearborn County.

Pollutant	Designation
SO <sub>2</sub>	Cannot be classified.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	On June 11, 2012, the U.S. EPA designated Dearborn County Lawrenceburg Twp nonattainment, for the 8-hour ozone standard. The remainder of Dearborn County is attainment effective May 11, 2010, for the 8-hour ozone standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
Unclassifiable or attainment effective December 23, 2011, for the Lawrenceburg Twp for PM <sub>2.5</sub> . The remainder of Dearborn County is unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .	

- (a) **Ozone Standards**  
U.S. EPA, in the Federal Register Notice 77 FR 112 dated June 11, 2012, has designated Dearborn County Lawrenceburg Township as nonattainment for ozone. On August 1, 2012 the air pollution control board issued an emergency rule adopting the U.S. EPA's designation. This rule became effective, August 9, 2012. IDEM, does not agree with U.S. EPA's designation of nonattainment. IDEM filed a suit against US EPA in the US Court of Appeals for the DC Circuit on July 19, 2012. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's designation. Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NO<sub>x</sub> emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

- (b) **PM<sub>2.5</sub>**  
 County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> 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<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub>, NO<sub>x</sub>, and SO<sub>2</sub> 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**  
 Dearborn County has been classified as attainment or unclassifiable in Indiana for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and Lead.. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

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

**Source Status**

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

Pollutant	Emissions (Tons/year)
PM	4,264
PM <sub>10</sub>	1,069
PM <sub>2.5</sub>	Not Available
SO <sub>2</sub>	1,688
VOC	2,654
CO	665
NO <sub>x</sub>	981
GHG	Not Available
Single HAP	Greater than 10
Total HAP	Greater than 25

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) These emissions are based upon Technical Support Document for Title V No. 029-24407-00005.

**Description of Proposed Modification**

The Office of Air Quality (OAQ) has reviewed an Administrative Permit Amendment application, submitted by MGPI of Indiana, LLC on October 5, 2012, regarding the addition of three (3) 4.2 MMBtu/hr natural gas fired boilers as follows:

- (a) Three (3) natural gas fired boilers with a heat input of capacity of 4.2 MMBtu/hr each, approved in 2012 for installation.. [326 IAC 6-2-4]

**Enforcement Issues**

There are no pending enforcement actions related to this modification.

**Emission Calculations**

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

**Permit Level Determination – Part 70**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

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

<b>Increase in PTE Before Controls of the Modification</b>	
<b>Pollutant</b>	<b>Potential To Emit (ton/yr)</b>
PM	0.10
PM <sub>10</sub>	0.41
PM <sub>2.5</sub>	0.41
SO <sub>2</sub>	0.03
VOC	0.30
CO	4.54
NO <sub>x</sub>	5.41
GHG	6532
Single HAPs	>10
Total HAPs	>25

The proposed natural gas fired boilers will result in a PTE that is less than minor source modification levels. Therefore, this modification is not subject to the source modification requirements under 326IAC 2-7-10.5. The changes will be incorporated into the permit as an Administrative Amendment under 326 IAC 2-7-11(a)(8), because it incorporates exempt units as described in 326 IAC 2-1.1-3 that do not otherwise constitute a modification for purposes of section 326 IAC 2-7-10.5 or 326 IAC 2-7-12 of this rule.

**Permit Level Determination – PSD**

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 administrative amendment, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process / Emission Unit	Potential to Emit (ton/yr)							
	PM	PM <sub>10</sub>	PM <sub>2.5</sub> *	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	GHGs
<b>New Total Emissions for the Modification</b>	<b>0.10</b>	<b>0.41</b>	<b>0.41</b>	<b>0.03</b>	<b>0.30</b>	<b>4.54</b>	<b>5.41</b>	<b>6532</b>
Significant Level	25	15	10	40	40	100	40	75,000 CO <sub>2</sub> e

\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.  
 \*\*NA means not available from previous permits

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

**Emission Calculations**

See pages 1 through 3 of Appendix A of this document for detailed emission calculations.

**Federal Rule Applicability Determination**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) The three (3) natural gas fired boilers are not subject to the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 6040c, Subpart Dc, which is incorporated by reference as 326 IAC 12. They were constructed after June 9, 1989 and have heat input capacities less than 10 MMBtu/hr.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.
- (d) The three natural fired boilers are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for for Industrial, Commercial and Institutional Boilers Area Sources, Subpart JJJJJJ because the source is major for HAPs.
- (e) The three (3) natural gas fired boilers are not subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. They burn natural gas and have heat input capacities less than 10 MMBtu/hr.

### State Rule Applicability Determination

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

Pursuant to 326 IAC 6-2-4, the three natural gas fired boilers shall be limited to 0.38 pounds per MMBtu.

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

where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in MMBtu/hr heat input.

Total maximum operating capacity (Q) of all indirect heating facilities constructed after September 21, 1983, (EU-97 and three natural gas fired boilers) is 60.2 MMBtu/hr.

### Compliance Determination and Monitoring Requirements

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

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

There are no new compliance monitoring or determination requirements as a result of this administrative amendment.

### Proposed Changes

The new emission units are considered exempt pursuant to 326 IAC 2-7-10.5 and have no specific applicable requirements. The following changes have been made to the Part 70 Operating Permit No. T059-29178-00013. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

#### Change No. 1:

The new boilers have been added to Condition A.3 and Section D.4:

#### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]

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

\*\*\*

- (b) **Three (3) natural gas fired boilers with a heat input of capacity of 4.2 MMBtu/hr each, approved in 2012 for installation. [326 IAC 6-2-4]**
- (bc) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (ed) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3-2].

**SECTION D.4 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)] Insignificant Activities**

\*\*\*

- (b) **Three (3) natural gas fired boilers with a heat input of capacity of 4.2 MMBtu/hr each, approved in 2012 for installation. [326 IAC 6-2-4]**
- (bc) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3-2].

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

**D.4.2 Particulate Emissions Limitations for Sources of Indirect Heating [326 IAC 6-2-4]**

Pursuant to 326 IAC 6-2-4, the three natural gas fired boilers shall be limited to 0.38 pounds per MMBtu.

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

where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in MMBtu/hr heat input.

~~Total maximum operating capacity is 47.6 MMBtu/hr (Steam boiler EU-97 when burning natural gas).~~  
**Total maximum operating capacity (Q) of the Steam boiler all indirect heating facilities constructed after September 21, 1983, (EU-97 and three natural gas fired boilers) is 60.2 MMBtu/hr.**

**Conclusion and Recommendation**

The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Administrative Amendment No. 029-32386-00005. The staff recommends to the Commissioner that this Administrative Amendment to Part 70 Permit No. 029-24407-00005 be approved.

<b>IDEM Contact</b>
---------------------

- (a) Questions regarding this proposed permit can be directed to Teresa Freeman 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) 234-1243 or toll free at 1-800-451-6027 extension 4-1243.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

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

**Company Name:** MGPI of Indiana, LLC  
**Address City IN Zip:** 7 Ridge Avenue, Lawrenceburg, Indiana 47025  
**Permit Number:** 029-32386-00005  
**Reviewer:** Teresa Freeman  
**Date:** October 25, 2012

Heat Input Capacity	Potential Throughput
MMBtu/hr	MMCF/yr
12.6	108

	Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100.0	5.5	84.0
					**see below		
Potential Emission in tons/yr	0.10	0.41	0.41	0.03	5.41	0.30	4.54

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

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

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/1,020 MMBtu

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

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 HAPs Emissions**

**Company Name:** MGPI of Indiana, LLC  
**Address City IN Zip:** 7 Ridge Avenue, Lawrenceburg, Indiana 47025  
**Permit Number:** 029-32386-00005  
**Reviewer:** Teresa Freeman  
**Date:** October 25, 2012

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.136E-04	6.493E-05	4.058E-03	9.739E-02	1.840E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.705E-05	5.952E-05	7.575E-05	2.056E-05	1.136E-04
					<b>Total Haps</b>
					0.10

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.  
 See Page 3 for Greenhouse Gas calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
Greenhouse Gas Emissions**

**Company Name:** MGPI of Indiana, LLC  
**Address City IN Zip:** 7 Ridge Avenue, Lawrenceburg, Indiana 47025  
**Permit Number:** 029-32386-00005  
**Reviewer:** Teresa Freeman  
**Date:** October 25, 2012

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120000	2.3	2.2
Potential Emission in tons/yr	6492.7	0.12	0.12
Summed Potential Emissions in tons/yr	6492.9		
CO2e Total in tons/yr	6532		

**Methodology**

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



# 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](http://www.idem.IN.gov)

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

**TO:** William R Graves  
MGPI of Indiana, LLC  
PO Box 7  
Lawrenceburg, IN 47025

**DATE:** December 17, 2012

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

**SUBJECT:** Final Decision  
Administrative Amendment  
029-32386-00005

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:  
James Vinoski – Plant Manager  
Michael P Zimmer – Trinity Consultants  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

IDEM Staff	GHOTOPP 12/17/2012 MGPI of Indiana 029-32386-00005 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:  <b>CERTIFICATE OF MAILING ONLY</b>	

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1		William R Graves MGPI of Indiana PO Box 7 Lawrenceburg IN 47025 (Source CAATS) via confirmed delivery										
2		James Vinoski Plant Mgr MGPI of Indiana PO Box 7 Lawrenceburg IN 47025 (RO CAATS)										
3		Michael & Monica Ramsey 9931 Old SR 56 Aurora IN 47001 (Affected Party)										
4		Dearborn County Commissioner 215 B West High Street Lawrenceburg IN 47025 (Local Official)										
5		Lawrenceburg City Council and Mayors Office 212 Walnut St. Lawrenceburg IN 47025 (Local Official)										
6		Dearborn County Health Department 215-b W. Hight St, County Admin Building Lawrenceburg IN 47025-1910 (Health Department)										
7		Mr. John Teaney P.O. Box 494 10837 Aurora IN 47001 (Affected Party)										
8		Robin & Vic Willoughby 311 Broadway Street Aurora IN 47001 (Affected Party)										
9		James & Mary Hassett 7199 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)										
10		Nancy & William McDaniel 4600 Hartford PK # 98 Aurora IN 47001 (Affected Party)										
11		Ken & Jackie Greive 4685 E. Laughery Creek Road Aurora IN 47001 (Affected Party)										
12		Marlin M. Guss, Jr. 10400 Millstone Dr, P.O. Box 272 Aurora IN 47001 (Affected Party)										
13		Mrs. Shirley Greive 4412 E. Laughery Aurora IN 47001 (Affected Party)										
14		Ms. Patricia Huff 10095 Old SR 56 Aurora IN 47001 (Affected Party)										
15		Sam & Nancy Valone 3826 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)										

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1		Peter & Jody Franklin 9212 Hawksridge Dr. Covington KY 41017-9136 (Affected Party)										
2		Mrs. Melanie Bushorn 4172 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)										
3		Mr. Michael P Zimmer Trinity Consultants 1717 Dixie Highway Ste. 900 Covington KY 41011 (Consultant)										
4												
5												
6												
7												
8												
9												
10												
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