



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
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: May 2, 2013

RE: PGP International Inc. / 163-32776-00197

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

## Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot12/03/07



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## New Source Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

**PGP International Inc.  
5404 Foundation Dr.  
Evansville, Indiana 47725**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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

Operation Permit No.: M163-32776-00197	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 2, 2013  Expiration Date: May 2, 2018

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary animal feed and cereal manufacturing operation.

Source Address:	5404 Foundation Dr., Evansville, Indiana 47725
General Source Phone Number:	530-662-5056
SIC Code:	2043 (Cereal Breakfast Foods); 2048 (Prepared Feeds)
County Location:	Vanderburgh
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) rail car unloading system, identified as ES-1, approved for construction in 2013, and consisting of the following units:
  - (1) One (1) blower for rail car unloading, approved for construction in 2013, with a maximum throughput of 50,000 pounds per hour.
  - (2) Four (4) flour storage silos, approved for construction in 2013, with a maximum storage capacity of 33,000 pounds each, using baghouses BF-1 through BF-4 for particulate control, and exhausting to stack V1.
- (b) One (1) animal feed production line, approved for construction in 2013, consisting of the following units:
  - (1) A flour distribution system, identified as ES-2, running from the flour silos to the extruders, approved for construction in 2013, with a maximum capacity of 4000 pounds per hour, and consisting of the following units:
    - (i) Four (4) rotary valves, approved for construction in 2013.
    - (ii) One (1) transfer blower, approved for construction in 2013, using baghouse BF-5 for particulate control, and exhausting to stack V2.
    - (iii) One (1) vibration feeder, approved for construction in 2013.
    - (iv) Two (2) screw conveyers, approved for construction in 2013.
  - (2) Two (2) extruders, identified as ES-3, approved for construction in 2013, with a maximum capacity of 3000 pounds per hour each, with two rotary valves using cyclones C1 and C2 for particulate control, and exhausting to vent B-7.

- (3) Two (2) natural gas-fired air rotation units, identified as CU-3 and CU-4, approved for construction in 2013, each with a maximum heat input capacity of 1 MMBtu per hour.
- (4) One (1) natural gas-fired dryer oven, identified as CU-1, approved for construction in 2013, with a maximum heat input capacity of 7 MMBtu per hour, with a maximum throughput of 6000 pounds per hour, using baghouse BF-7 for particulate control, and exhausting to vents V3 and V4.
- (5) One finish feed packaging system, identified as ES-5, approved for construction in 2013, with a maximum throughput of 4000 pounds per hour, using aspiration baghouse BF-8 for particulate control, exhausting to vent V4 and consisting of the following units:
  - (i) One (1) bucket elevator conveyor, approved for construction in 2013.
  - (ii) One (1) sifter, approved for construction in 2013.
  - (iii) One (1) metal detector and sifter, approved for construction in 2013.
- (c) One (1) rice crisp production line, approved for construction in 2013, consisting of the following units:
  - (1) One (1) batch and blending system, identified as ES-6, approved for construction in 2013, with a maximum throughput of 4000 pounds per hour, using baghouse BF-9 for particulate control, exhausting to vent V5, and consisting of the following units:
    - (i) Three (3) bulk bag unloaders, approved for construction in 2013.
    - (ii) Three (3) rotary valves, approved for construction in 2013.
    - (iii) Three (3) day bins, approved for construction in 2013.
    - (iv) Three (3) bin conveyors, approved for construction in 2013.
    - (v) One (1) sifter with rotary valve, approved for construction in 2013.
    - (vi) One (1) mixer and surge hopper, approved for construction in 2013.
  - (2) One (1) batch distribution system, identified as ES-7, approved for construction in 2013, with a maximum throughput of 4000 pounds per hour, consisting of a screw conveyor and rare earth magnet, using baghouse BF-10 for particulate control, and exhausting to vent V6.
  - (3) One (1) extruder, identified as ES-8, approved for construction in 2013, with a maximum throughput capacity of 6000 pounds per hour, using cyclone C3 for particulate control, and exhausting to vent V7.
  - (4) One (1) crisp drying system, identified as ES-9, approved for construction in 2013, with a maximum capacity of 6000 pounds per hour, using cyclones C-4, C-5, and C-6 for particulate control, exhausting to vents V8 and V9, and consisting of the following units:
    - (i) One (1) fan transfer unit, approved for construction in 2013.

- (ii) One (1) rotary valve, approved for construction in 2013.
  - (iii) One (1) shaker table, approved for construction in 2013.
  - (iv) One (1) natural gas fired oven, identified as unit CU-2, approved for construction in 2013, with a maximum heat input capacity of 13.0 MMBtu per hour.
- (5) One (1) finish crisp packaging system, identified as ES-10, approved for construction in 2013, with a maximum capacity of 4000 pounds per hour, using baghouse BF-9 for particulate control, exhausting to vent V5, and consisting of the following units:
- (i) One (1) bucket elevator conveyor, approved for construction in 2013.
  - (ii) One (1) sifter, approved for construction in 2013.
  - (iii) One (1) metal detector, approved for construction in 2013.
  - (iv) One (1) finished product packaging unit, approved for construction in 2013.
- (d) Three (3) natural gas-fired roof-top units, identified as RTU 1, 7a, and 7b, each with a maximum heat input capacity of 0.18 MMBtu per hour.
- (e) Three (3) natural gas-fired roof-top units, identified as RTU 2, 3, and 4, each with a maximum heat input capacity of 0.125 MMBtu per hour.
- (f) Two (2) natural gas-fired roof-top units, identified as RTU 5 and 6, each with a maximum heat input capacity of 0.072 MMBtu per hour.
- (g) Paved roads.

## **SECTION B GENERAL CONDITIONS**

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

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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 2-1.1-1) shall prevail.

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

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

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

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

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

### **B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

- 
- (a) This permit, M163-32776-00197, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
  - (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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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.6 Enforceability**

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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.7 Severability**

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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.8 Property Rights or Exclusive Privilege**

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

**B.9 Duty to Provide Information**

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

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

**B.11 Preventive Maintenance Plan [326 IAC 1-6-3]**

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

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

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M163-32776-00197 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

B.14 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.16 Source Modification Requirement**

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

**B.17 Inspection and Entry**

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[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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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 permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under this permit;

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

**B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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

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

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

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

**B.19 Annual Fee Payment [326 IAC 2-1.1-7]**

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

**B.20 Credible Evidence [326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 Permit Revocation [326 IAC 2-1.1-9]

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

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

#### C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

#### C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

#### **C.8 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.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

#### **C.9 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 2-6.1-5(a)(2)]**

#### **C.10 Compliance Monitoring [326 IAC 2-1.1-11]**

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

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

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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**

#### **C.12 Response to Excursions or Exceedances**

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

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

#### **C.13 Actions Related to Noncompliance Demonstrated by a Stack Test**

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

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

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

#### **C.14 Malfunctions Report [326 IAC 1-6-2]**

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

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

#### **C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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

#### **C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]**

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or

certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) rail car unloading system, identified as ES-1, approved for construction in 2013, and consisting of the following units:
  - (1) One (1) blower for rail car unloading, approved for construction in 2013, with a maximum throughput of 50,000 pounds per hour.
  - (2) Four (4) flour storage silos, approved for construction in 2013, with a maximum storage capacity of 33,000 pounds each, using baghouses BF-1 through BF-4 for particulate control, and exhausting to stack V1.
- (b) One (1) animal feed production line, approved for construction in 2013, consisting of the following units:
  - (1) A flour distribution system, identified as ES-2, running from the flour silos to the extruders, approved for construction in 2013, with a maximum capacity of 4000 pounds per hour, and consisting of the following units:
    - (i) Four (4) rotary valves, approved for construction in 2013.
    - (ii) One (1) transfer blower, approved for construction in 2013, using baghouse BF-5 for particulate control, and exhausting to stack V2.
    - (iii) One (1) vibration feeder, approved for construction in 2013.
    - (iv) Two (2) screw conveyers, approved for construction in 2013.
  - (2) Two (2) extruders, identified as ES-3, approved for construction in 2013, with a maximum capacity of 3000 pounds per hour each, with two rotary valves using cyclones C1 and C2 for particulate control, and exhausting to vent B-7.
  - (3) Two (2) natural gas-fired air rotation units, identified as CU-3 and CU-4, approved for construction in 2013, each with a maximum heat input capacity of 1 MMBtu per hour.
  - (4) One (1) natural gas-fired dryer oven, identified as CU-1, approved for construction in 2013, with a maximum heat input capacity of 7 MMBtu per hour, with a maximum throughput of 6000 pounds per hour, using baghouse BF-7 for particulate control, and exhausting to vent V3 and V4.
  - (5) One finish feed packaging system, identified as ES-5, approved for construction in 2013, with a maximum throughput of 4000 pounds per hour, using aspiration baghouse BF-8 for particulate control, exhausting to vent V4 and consisting of the following units:
    - (i) One (1) bucket elevator conveyor, approved for construction in 2013.
    - (ii) One (1) sifter, approved for construction in 2013.
    - (iii) One (1) metal detector and sifter, approved for construction in 2013.

- (c) One (1) rice crisp production line, approved for construction in 2013, consisting of the following units:
- (1) One (1) batch and blending system, identified as ES-6, approved for construction in 2013, with a maximum throughput of 4000 pounds per hour, using baghouse BF-9 for particulate control, exhausting to vent V5, and consisting of the following units:
    - (i) Three (3) bulk bag unloaders, approved for construction in 2013.
    - (ii) Three (3) rotary valves, approved for construction in 2013.
    - (iii) Three (3) day bins, approved for construction in 2013.
    - (iv) Three (3) bin conveyors, approved for construction in 2013.
    - (v) One (1) sifter with rotary valve, approved for construction in 2013.
    - (vi) One (1) mixer and surge hopper, approved for construction in 2013.
  - (2) One (1) batch distribution system, identified as ES-7, approved for construction in 2013, with a maximum throughput of 4000 pounds per hour, consisting of a screw conveyor and rare earth magnet, using baghouse BF-10 for particulate control, and exhausting to vent V6.
  - (3) One (1) extruder, identified as ES-8, approved for construction in 2013, with a maximum throughput capacity of 6000 pounds per hour, using cyclone C3 for particulate control, and exhausting to vent V7.
  - (4) One (1) crisp drying system, identified as ES-9, approved for construction in 2013, with a maximum capacity of 6000 pounds per hour, using cyclones C-4, C-5, and C-6 for particulate control, exhausting to vents V8 and V9, and consisting of the following units:
    - (i) One (1) fan transfer unit, approved for construction in 2013.
    - (ii) One (1) rotary valve, approved for construction in 2013.
    - (iii) One (1) shaker table, approved for construction in 2013.
    - (iv) One (1) natural gas fired oven, identified as unit CU-2, approved for construction in 2013, with a maximum heat input capacity of 13.0 MMBtu per hour.
  - (5) One (1) finish crisp packaging system, identified as ES-10, approved for construction in 2013, with a maximum capacity of 4000 pounds per hour, using baghouse BF-9 for particulate control, exhausting to vent V5, and consisting of the following units:
    - (i) One (1) bucket elevator conveyor, approved for construction in 2013.
    - (ii) One (1) sifter, approved for construction in 2013.
    - (iii) One (1) metal detector, approved for construction in 2013.
    - (iv) One (1) finished product packaging unit, approved for construction in 2013.

- (d) Three (3) natural gas-fired roof-top units, identified as RTU 1, 7a, and 7b, each with a maximum heat input capacity of 0.18 MMBtu per hour.
  - (e) Three (3) natural gas-fired roof-top units, identified as RTU 2, 3, and 4, each with a maximum heat input capacity of 0.125 MMBtu per hour.
  - (f) Two (2) natural gas-fired roof-top units, identified as RTU 5 and 6, each with a maximum heat input capacity of 0.072 MMBtu per hour.
  - (g) Paved roads.
- (The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

**D.1.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1]**

- (a) Pursuant to 326 IAC 6.5-1-2(a), 326 IAC 6.5-1-2(b)(3), and 326 IAC 6.5-1-2(d)(1) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the facilities listed below shall be limited as follows:.

Emission Unit	Control Description	Particulate Emission Limit (gr/dscf)
Rail Car Unloading System ES-1 and associated flour storage silos	Baghouses BF-1 through BF-4	0.03
Flour Distribution System ES-2	Baghouse BF-5	0.03
Extruders ES-3	Cyclones C1 and C2	0.03
Air Rotation Units CU-3 and CU-4	None	0.03
Dryer Oven CU-1	Baghouse BF-7	0.03
Finish Feed Packaging System ES-5	Baghouse BF-8	0.03
Batch and Blending System ES-6	Baghouse BF-9	0.03
Batch Distribution System ES-7	Baghouse BF-10	0.03
Extruder ES-8	Cyclone C3	0.03
Crisp Drying System ES-9	Cyclones C-4, C-5, and C-6	0.03
Finish Crisp Packaging System ES-10	Baghouse BF-9	0.03
Roof-top Units RTU 1 through 6, 7a, and 7b	None	0.03

- (b) Pursuant to 326 IAC 6.5-1-2(d)(2) (Particulate Matter Limitations Except Lake County), the Permittee shall comply with the following for the rail car unloading system and associated flour storage silos:

The Permittee shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:

- (1) Housekeeping practices shall be conducted as follows:
  - (A) Areas to be swept and maintained shall include, at a minimum, the following:

- (i) General grounds, yard, and other open areas.
- (ii) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.
- (iii) Grain driers with respect to accumulated particulate matter.
- (B) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
- (C) Dust from driveways, access roads, and other areas of travel shall be controlled.
- (D) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.
- (2) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
  - (A) Malfunctions.
  - (B) Breakdowns.
  - (C) Improper adjustment.
  - (D) Operating above the rated or designed capacity.
  - (E) Not following designed operating specifications.
  - (F) Lack of good preventive maintenance care.
  - (G) Lack of critical and proper spare replacement parts on hand.
  - (H) Lack of properly trained and experienced personnel.
- (3) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined under 326 IAC 5-1.

#### D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### **Compliance Determination Requirements**

#### D.1.3 Particulate Control

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- (a) In order to comply with Condition D.1.1, the baghouses and cyclones associated with the emission units in Condition D.1.1 shall be in operation and control particulate emissions from the respective emission units at all times the emission units are in operation.
- (b) 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.

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

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

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- (a) Daily visible emission notations of the stack exhausts from baghouses BF-1 through BF-5, BF-9, and BF-10 shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable a response step(s). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take a response step(s) shall be considered a deviation from this permit.

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

### **D.1.5 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.1.4, the Permittee shall maintain records of daily visible emission notations of the stack exhausts from baghouses BF-1 through BF-5, BF-9, and BF-10. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	PGP International Inc.
<b>Address:</b>	5404 Foundation Dr.
<b>City:</b>	Evansville, Indiana 47725
<b>Phone #:</b>	530-662-5056
<b>MSOP #:</b>	M163-32776-00197

I hereby certify that PGP International Inc. is :

still in operation.

I hereby certify that PGP International Inc. is :

no longer in operation.

in compliance with the requirements of MSOP M163-32776-00197.

not in compliance with the requirements of MSOP M163-32776-00197.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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

PGP International Inc.  
5404 Foundation Dr.  
Evansville, Indiana 47725

Affidavit of Construction

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

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_  
(Company Name)
4. I hereby certify that PGP International Inc. 5404 Foundation Dr., Evansville, Indiana 47725, completed construction of the animal feed and cereal manufacturing operation on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on January 29, 2013 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M163-32776-00197, Plant ID No. 163-00197 issued on \_\_\_\_\_.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature \_\_\_\_\_  
Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

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

Signature \_\_\_\_\_  
Name \_\_\_\_\_ (typed or printed)

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

Technical Support Document (TSD) for a New Source Construction and  
Minor Source Operating Permit (MSOP)

**Source Description and Location**

**Source Name:** PGP International Inc.  
**Source Location:** 5404 Foundation Dr., Evansville, IN 47725  
**County:** Vanderburgh  
**SIC Code:** 2043 (Cereal Breakfast Foods); 2048 (Prepared Feeds)  
**Operation Permit No.:** M163-32776-00197  
**Permit Reviewer:** Brian Wright

On January 29, 2013, the Office of Air Quality (OAQ) received an application from PGP International Inc. related to the construction and operation of a new stationary animal feed and cereal manufacturing operation.

**Existing Approvals**

There have been no previous approvals issued to this source.

**County Attainment Status**

The source is located in Vanderburgh County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective January 30, 2006, for the Evansville area, including Vanderburgh County, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Attainment effective October 18, 2000, for the 1-hour ozone standard for the Evansville area, including Vanderburgh County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Unclassifiable or attainment effective October 27, 2011, for PM <sub>2.5</sub> .	

- (a) **Ozone Standards**  
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
 Vanderburgh 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> 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  
Vanderburgh County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

#### **Fugitive Emissions**

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

#### **Background and Description of New Source Construction**

The Office of Air Quality (OAQ) has reviewed an application, submitted by PGP International Inc. on January 29, 2013, to construct and operate a new stationary animal feed and cereal manufacturing operation.

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

- (a) One (1) rail car unloading system, identified as ES-1, approved for construction in 2013, and consisting of the following units:
- (1) One (1) blower for rail car unloading, approved for construction in 2013, with a maximum throughput of 50,000 pounds per hour.
  - (2) Four (4) flour storage silos, approved for construction in 2013, with a maximum storage capacity of 33,000 pounds each, using baghouses BF-1 through BF-4 for particulate control, and exhausting to stack V1.
- (b) One (1) animal feed production line, approved for construction in 2013, consisting of the following units:
- (1) A flour distribution system, identified as ES-2, running from the flour silos to the extruders, approved for construction in 2013, with a maximum capacity of 4000 pounds per hour, and consisting of the following units:
    - (i) Four (4) rotary valves, approved for construction in 2013.
    - (ii) One (1) transfer blower, approved for construction in 2013, using baghouse BF-5 for particulate control, and exhausting to stack V2.
    - (iii) One (1) vibration feeder, approved for construction in 2013.
    - (iv) Two (2) screw conveyers, approved for construction in 2013.
  - (2) Two (2) extruders, identified as ES-3, approved for construction in 2013, with a maximum capacity of 3000 pounds per hour each, with two rotary valves using cyclones C1 and C2 for particulate control, and exhausting to vent B-7.

- (3) Two (2) natural gas-fired air rotation units, identified as CU-3 and CU-4, approved for construction in 2013, each with a maximum heat input capacity of 1 MMBtu per hour.
- (4) One (1) natural gas-fired dryer oven, identified as CU-1, approved for construction in 2013, with a maximum heat input capacity of 7 MMBtu per hour, with a maximum throughput of 6000 pounds per hour, using baghouse BF-7 for particulate control, and exhausting to vent V3 and V4.
- (5) One finish feed packaging system, identified as ES-5, approved for construction in 2013, with a maximum throughput of 4000 pounds per hour, using aspiration baghouse BF-8 for particulate control, exhausting to vent V4 and consisting of the following units:
  - (i) One (1) bucket elevator conveyor, approved for construction in 2013.
  - (ii) One (1) sifter, approved for construction in 2013.
  - (iii) One (1) metal detector and sifter, approved for construction in 2013.
- (c) One (1) rice crisp production line, approved for construction in 2013, consisting of the following units:
  - (1) One (1) batch and blending system, identified as ES-6, approved for construction in 2013, with a maximum throughput of 4000 pounds per hour, using baghouse BF-9 for particulate control, exhausting to vent V5, and consisting of the following units:
    - (i) Three (3) bulk bag unloaders, approved for construction in 2013.
    - (ii) Three (3) rotary valves, approved for construction in 2013.
    - (iii) Three (3) day bins, approved for construction in 2013.
    - (iv) Three (3) bin conveyors, approved for construction in 2013.
    - (v) One (1) sifter with rotary valve, approved for construction in 2013.
    - (vi) One (1) mixer and surge hopper, approved for construction in 2013.
  - (2) One (1) batch distribution system, identified as ES-7, approved for construction in 2013, with a maximum throughput of 4000 pounds per hour, consisting of a screw conveyor and rare earth magnet, using baghouse BF-10 for particulate control, and exhausting to vent V6.
  - (3) One (1) extruder, identified as ES-8, approved for construction in 2013, with a maximum throughput capacity of 6000 pounds per hour, using cyclone C3 for particulate control, and exhausting to vent V7.
  - (4) One (1) crisp drying system, identified as ES-9, approved for construction in 2013, with a maximum capacity of 6000 pounds per hour, using cyclones C-4, C-5, and C-6 for particulate control, exhausting to vents V8 and V9, and consisting of the following units:
    - (i) One (1) fan transfer unit, approved for construction in 2013.
    - (ii) One (1) rotary valve, approved for construction in 2013.
    - (iii) One (1) shaker table, approved for construction in 2013.

- (iv) One (1) natural gas fired oven, identified as unit CU-2, approved for construction in 2013, with a maximum heat input capacity of 13.0 MMBtu per hour.
- (5) One (1) finish crisp packaging system, identified as ES-10, approved for construction in 2013, with a maximum capacity of 4000 pounds per hour, using baghouse BF-9 for particulate control, exhausting to vent V5, and consisting of the following units:
  - (i) One (1) bucket elevator conveyor, approved for construction in 2013.
  - (ii) One (1) sifter, approved for construction in 2013.
  - (iii) One (1) metal detector, approved for construction in 2013.
  - (iv) One (1) finished product packaging unit, approved for construction in 2013.
- (d) Three (3) natural gas-fired roof-top units, identified as RTU 1, 7a, and 7b, each with a maximum heat input capacity of 0.18 MMBtu per hour.
- (e) Three (3) natural gas-fired roof-top units, identified as RTU 2, 3, and 4, each with a maximum heat input capacity of 0.125 MMBtu per hour.
- (f) Two (2) natural gas-fired roof-top units, identified as RTU 5 and 6, each with a maximum heat input capacity of 0.072 MMBtu per hour.
- (g) Paved roads.

**Enforcement Issues**

There are no pending enforcement actions related to this source.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – MSOP**

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

Pollutant	Potential To Emit (tons/year)
PM	170.57
PM10 <sup>(1)</sup>	61.17
PM2.5	59.03
SO <sub>2</sub>	0.06
NO <sub>x</sub>	9.90
VOC	0.54
CO	8.32
GHGs as CO <sub>2</sub> e	11,594

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

HAPs	Potential To Emit (tons/year)
Hexane	0.18
Formaldehyde	0.01
<b>TOTAL HAPs</b>	<b>0.019</b>

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM10 and PM2.5 are each less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7..

**Federal Rule Applicability Determination**

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60, Subpart DD (326 IAC 12), are not included in the permit, since this facility manufactures animal feed and cereal.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Major sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (326 IAC 20-95), are not included in this permit since the source is not a major source of HAPs.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Sources: Prepared Feeds Manufacture, 40 CFR 63.11619-63.11638, Subpart DDDDDDD, are not included in the permit, since this source does not use materials containing chromium or manganese.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included in this permit since the natural gas-fired units located at the source are not boilers as defined in 40 CFR 63.11237.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

### Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability Determination</b>
---

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))  
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO<sub>2</sub>e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-3 (Emission Offset)  
This source is not subject to the requirements of 326 IAC 2-3 (Emission Offset), since Vanderburgh County is attainment for all criteria pollutants.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (e) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
The source is subject to the requirements of 326 IAC 6-4, because the paved roads at this source have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

- (h) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The unlimited potential to emit VOCs from each emission unit at this source is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6, do not apply and are not included in the permit.
- (i) There are no 326 IAC 8 Rules that are applicable to this source.
- (j) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (k) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

#### Rail Car Unloading System

- (l) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(c)(3), the particulate matter (PM) emissions from the rail car unloading system are not subject to 326 IAC 6-3, because they are regulated under 326 IAC 6.5.
- (m) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-1(a)(2), this source is subject to the requirements of 326 IAC 6.5-1-2, because this source is located in Vanderburgh County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and has potential particulate matter emissions greater than 10 tons per year. Pursuant to 326 IAC 6.5-1-2(d)(1), particulate matter (PM) emissions from the rail car unloading system and associated flour storage silos shall not exceed three hundredths (0.03) grain per dry standard cubic foot (dscf).

In order to comply with this limit, the baghouses BF-1 through BF-4 shall be operated at all times that the rail car unloading system is in operation.

- (n) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-2(d)(2), this source is subject to the requirements of 326 IAC 6.5-1-2, because this source is located in Vanderburgh County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and has potential particulate matter emissions greater than 10 tons per year.

Pursuant to 326 IAC 6.5-1-2(d)(2) (Particulate Matter Limitations Except Lake County), the Permittee shall comply with the following for the rail car unloading system and associated flour storage silos:

The Permittee shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:

- (1) Housekeeping practices shall be conducted as follows:
  - (A) Areas to be swept and maintained shall include, at a minimum, the following:
    - (i) General grounds, yard, and other open areas.
    - (ii) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.
    - (iii) Grain driers with respect to accumulated particulate matter.

- (B) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
  - (C) Dust from driveways, access roads, and other areas of travel shall be controlled.
  - (D) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.
- (2) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
- (A) Malfunctions.
  - (B) Breakdowns.
  - (C) Improper adjustment.
  - (D) Operating above the rated or designed capacity.
  - (E) Not following designed operating specifications.
  - (F) Lack of good preventive maintenance care.
  - (G) Lack of critical and proper spare replacement parts on hand.
  - (H) Lack of properly trained and experienced personnel.
- (3) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined under 326 IAC 5-1.

#### Animal Feed and Rice Crisp Production Lines

- (o) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(c)(3), the particulate matter (PM) emissions from the animal feed and rice crisp production lines are not subject to 326 IAC 6-3, because they are regulated under 326 IAC 6.5.
- (p) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-1(a)(2), this source is subject to the requirements of 326 IAC 6.5-1-2, because this source is located in Vanderburgh County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and has potential particulate matter emissions greater than 10 tons per year. Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the units associated with the animal feed and rice crisp production lines shall not exceed three hundredths (0.03) grain per dry standard cubic foot (dscf).

In order to comply with these limits, the baghouses BF-5, BF-7, BF-8, BF-9, and BF-10, and cyclones C1, C2, C-4, C-5, and C-6 shall be operated at all times that the units associated with the animal feed and rice crisp production lines are in operation.

#### Natural Gas Combustion

- (q) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heat)  
The particulate matter (PM) emissions from the animal feed dryer oven (CU-1), rice crisp dryer oven (CU-2), two (2) air rotation units (CU-3 and CU-4), and eight (8) roof top units (RTU 1 through 6, 7a, and 7b) are not subject to 326 IAC 6-2, because they are regulated under 326 IAC 6.5.
- (r) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(1), the animal feed dryer oven (CU-1), rice crisp dryer oven (CU-2), two (2) air rotation units (CU-3 and CU-4), and eight (8) roof top units (RTU 1 through 6, 7a, and 7b) are each not subject to the requirements of 326 IAC 6-3, because they are regulated under 326 IAC 6.5.

- (s) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-1(a)(2), this source is subject to the requirements of 326 IAC 6.5-1-2, because this source is located in Clark County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and has potential particulate matter emissions greater than 10 tons per year. Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the animal feed dryer oven (CU-1), rice crisp dryer oven (CU-2), two (2) air rotation units (CU-3 and CU-4), and eight (8) roof top units (RTU 1 through 6, 7a, and 7b) shall not exceed three hundredths (0.03) grain per dry standard cubic foot (dscf).

Note: These units are not considered "fuel combustion steam generators" as defined by 326 IAC 6.5-1-1.5, since they do not burn gaseous fuel for the purpose of producing steam by heat transfer.

- (t) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)  
Pursuant to 326 IAC 7-1.1-1, from the animal feed dryer oven (CU-1), rice crisp dryer oven (CU-2), two (2) air rotation units (CU-3 and CU-4), and eight (8) roof top units (RTU 1 through 6, 7a, and 7b) are each not subject to the requirements of 326 IAC 7-1, since each has unlimited sulfur dioxide (SO<sub>2</sub>) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour, respectively.

#### Compliance Determination, Monitoring and Testing Requirements

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

Emission Unit/Control	Operating Parameters	Frequency
Baghouses BF-1 through BF-5, BF-9, and BF-10	Visible Emissions	Daily

#### Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on January 29, 2013.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. M163-32776-00197. The staff recommends to the Commissioner that this New Source Construction and MSOP be approved.

#### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Wright 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) 234-6544 or toll free at 1-800-451-6027 extension 4-6544
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.in.gov/idem](http://www.in.gov/idem)

**Appendix A: Emission Calculations  
Emission Summary**

**Company Name:** PGP International Inc.  
**Source Address:** 5404 Foundation Dr., Evansville, IN 47725  
**Permit #:** M163-32776-00197  
**Reviewer:** Brian Wright  
**Date:** 01/30/13

**Unlimited/Uncontrolled Potential to Emit**

Process	Potential to Emit (tons/year)									
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	VOC	CO	GHG as CO <sub>2</sub> e	Total HAPs	Single HAP
Ingredient Storage and Conveying	169.31	60.20	58.22	0.00	0.00	0.00	0.00	0	0.00	0.00
Natural Gas Units	0.19	0.75	0.75	0.06	9.90	0.54	8.32	11954	0.19	0.18 Hexane
Paved Roads	1.07	0.21	0.05	0.00	0.00	0.00	0.00	0	0.00	0.00
<b>Total</b>	<b>170.57</b>	<b>61.17</b>	<b>59.03</b>	<b>0.06</b>	<b>9.90</b>	<b>0.54</b>	<b>8.32</b>	<b>11,954</b>	<b>0.19</b>	<b>0.18 Hexane</b>

**Appendix A: Emissions Calculations**  
Emissions from Dry Ingredient Storage and Conveying

Company Name: PGP International Inc.  
Source Address: 5404 Foundation Dr., Evansville, IN 47725  
Permit #: M163-32776-00197  
Reviewer: Brian Wright  
Date: 01/30/13

**Potential to Emit (PTE) of Particulate (PM/PM10/PM2.5)**

Emission Unit ID	Emission Unit Description	Bottleneck Ingredient Throughput (lbs/hr)	Bottleneck Ingredient Throughput (tons/hr)	PM Emission Factor (lbs/ton)	PM10 Emission Factor (lbs/ton)	PM2.5 Emission Factor (lbs/ton)	Uncontrolled PTE of PM (lbs/hour)	Uncontrolled PTE of PM10 (lbs/hour)	Uncontrolled PTE of PM2.5 (lbs/hour)	Uncontrolled PTE of PM (tons/yr)	Uncontrolled PTE of PM10 (tons/yr)	Uncontrolled PTE of PM2.5 (tons/yr)	Control Efficiency %	Uncontrolled PTE of PM (lbs/hour)	Controlled PTE of PM10 (lbs/hour)	Controlled PTE of PM2.5 (lbs/hour)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
ES-1	Railcar unloading to silos***	12000.0	6.00	3.14	1.10	1.10	18.84	6.60	6.60	82.52	28.91	28.91	99.5%	0.09	0.03	0.03	0.41	0.14	0.14
<b>Pellet Feed Line</b>																			
ES-2	Flour Distribution*	4000.0	2.00	3.14	1.10	1.10	6.28	2.20	2.20	27.51	9.64	9.64	99.5%	0.03	0.01	0.01	0.14	0.05	0.05
ES-3	Extrusion pelletizing (2 lines included in total)**	6000.0	3.00	0.061	0.0340	0.0058	0.18	0.10	0.02	0.80	0.45	0.08	99.5%	9.2E-04	5.1E-04	8.7E-05	4.0E-03	2.2E-03	3.8E-04
ES-4	pellet drying system**	6000.0	3.00	0.061	0.0340	0.0058	0.18	0.10	0.02	0.80	0.45	0.08	99.5%	9.2E-04	5.1E-04	8.7E-05	4.0E-03	2.2E-03	3.8E-04
ES-5	finish feed packaging**	4000.0	2.00	0.061	0.0340	0.0058	0.12	0.07	0.01	0.53	0.30	0.05	99.5%	6.1E-04	3.4E-04	5.8E-05	2.7E-03	1.5E-03	2.5E-04
<b>Rice Crisp Line</b>																			
ES-6	batch and blending*	4000.0	2.00	3.14	1.10	1.10	6.28	2.20	2.20	27.51	9.64	9.64	99.5%	0.03	0.01	0.01	0.14	0.05	0.05
ES-7	batch distribution*	4000.0	2.00	3.14	1.10	1.10	6.28	2.20	2.20	27.51	9.64	9.64	99.5%	0.03	0.01	0.01	0.14	0.05	0.05
ES-8	extrusion crisp**	6000.0	3.00	0.061	0.0340	0.0058	0.18	0.10	0.02	0.80	0.45	0.08	99.5%	9.2E-04	5.1E-04	8.7E-05	4.0E-03	2.2E-03	3.8E-04
ES-9	crisp drying system**	6000.0	3.00	0.061	0.0340	0.0058	0.18	0.10	0.02	0.80	0.45	0.08	99.5%	9.2E-04	5.1E-04	8.7E-05	4.0E-03	2.2E-03	3.8E-04
ES-10	finish crisp packaging**	4000.0	2.00	0.061	0.0340	0.0058	0.12	0.07	0.01	0.53	0.30	0.05	99.5%	6.1E-04	3.4E-04	5.8E-05	2.7E-03	1.5E-03	2.5E-04
<b>Total</b>										<b>169.31</b>	<b>60.20</b>	<b>58.22</b>				<b>0.85</b>	<b>0.30</b>	<b>0.29</b>	

**Methodology**

Bottleneck Hourly Throughput (tons/hr) = [Bottleneck Hourly Throughput (lbs/hr)] / [2000 lbs/ton]  
 Uncontrolled PTE (lbs/hour) = [Bottleneck Hourly Throughput (tons/hr)] x [Emission Factor (lbs/ton)]  
 Uncontrolled PTE (tons/year) = [Uncontrolled PTE (lbs/hour)] x [8760 hours/year] / [2000 lbs/ton]  
 Controlled PTE (tons/year) = [Uncontrolled PTE (tons/year)] x [1 - Control Efficiency]

**Notes:**

\* The uncontrolled potential to emit of particulate from the pneumatic conveying of dry ingredients are estimated using AP-42 Table 11.12-2 emission factors for uncontrolled truck unloading of cement supplement to elevated storage silo (pneumatic)  
 \*\*The uncontrolled potential to emit of particulate from dry ingredient storage and conveying before controls are estimated using AP-42 Table 9.9.1-1 emission factors for headhouse and grain handling at a grain elevator  
 \*\*\*For purposes of determining permit level, the maximum throughput for the railcar unloading is limited to 12000 lbs per hour due to a bottleneck created by the maximum throughput through the Pellet Feed Line Extruder and the Rice Crisp Line Extruder.

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

**Company Name:** PGP International Inc.  
**Source Address:** 5404 Foundation Dr., Evansville, IN 47725  
**Permit #:** M163-32776-00197  
**Reviewer:** Brian Wright  
**Date:** 01/30/13

Emission Unit ID	Emission Unit	Number of Units	Individual Heat Capacity (MMBtu/hr)	Total Heat Capacity (MMBtu/hr)
CU-3 and CU-4	Air Rotation Units	2	1.000	2.00
CU-1	Pellet Feed Dryer Oven	1	7.000	7.00
CU-2	Crisp Oven	1	13.000	13.00
RTU 1, 7a, 7b	Roof-Top Units	3	0.180	0.54
RTU 2, 3, and 4	Roof-Top Units	3	0.125	0.38
RTU 5 and 6	Roof-Top Units	2	0.072	0.14
			<b>Total</b>	<b>23.06</b>

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
23.06	1020	198.0

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.19	0.75	0.75	0.06	9.90	0.54	8.32

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

**Methodology**

All emission factors are based on normal firing.  
 MMBtu = 1,000,000 Btu  
 MMCF = 1,000,000 Cubic Feet of Gas  
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

updated 7/11

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

**Company Name:** PGP International Inc.  
**Source Address:** 5404 Foundation Dr., Evansville, IN 47725  
**Permit #:** M163-32776-00197  
**Reviewer:** Brian Wright  
**Date:** 01/30/13

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	2.1E-04	1.2E-04	7.4E-03	0.18	3.4E-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	5.0E-05	1.1E-04	1.4E-04	3.8E-05	2.1E-04
<b>Total HAP</b>					<b>0.19</b>

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:** PGP International Inc.  
**Source Address:** 5404 Foundation Dr., Evansville, IN 47725  
**Permit #:** M163-32776-00197  
**Reviewer:** Brian Wright  
**Date:** 01/30/13

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	11,882	0.23	0.22
Summed Potential Emissions in tons/yr	11,883		
CO2e Total in tons/yr	11,954		

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

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

**Company Name: PGP International Inc.  
Source Address: 5404 Foundation Dr., Evansville, IN 47721  
Permit #: M163-32776-00197  
Reviewer: Brian Wright  
Date: 01/30/13**

**Paved Roads at Industrial Site**

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	5.0	1.0	5.0	10.0	50.0	450	0.085	0.4	155.5
Vehicle (leaving plant) (one-way trip)	5.0	1.0	5.0	10.0	50.0	450	0.085	0.4	155.5
Vehicle (entering plant) (one-way trip)	24.0	1.0	24.0	15.0	360.0	450	0.085	2.0	746.6
Vehicle (leaving plant) (one-way trip)	24.0	1.0	24.0	15.0	360.0	450	0.085	2.0	746.6
<b>Totals</b>			<b>58.0</b>		<b>820.0</b>			<b>4.9</b>	<b>1804.3</b>

Average Vehicle Weight Per Trip = 14.1 tons/trip  
Average Miles Per Trip = 0.09 miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	14.1	14.1	14.1	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m <sup>2</sup> = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3

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

Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$   
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	1.296	0.259	0.0636	lb/mile
Mitigated Emission Factor, $E_{ext} =$	1.185	0.237	0.0582	lb/mile
Dust Control Efficiency =	0%	0%	0%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.10	0.02	0.005	0.09	0.02	0.005
Vehicle (leaving plant) (one-way trip)	0.10	0.02	0.005	0.09	0.02	0.005
Vehicle (entering plant) (one-way trip)	0.48	0.10	0.02	0.44	0.09	0.02
Vehicle (leaving plant) (one-way trip)	0.48	0.10	0.02	0.44	0.09	0.02
<b>Totals</b>	<b>1.17</b>	<b>0.23</b>	<b>0.06</b>	<b>1.07</b>	<b>0.21</b>	<b>0.05</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
**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:** Chong Yang  
PGP International Inc.  
351 Hanson Way  
Woodland, CA 95776

**DATE:** May 2, 2013

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

**SUBJECT:** Final Decision  
New Source Construction and Minor Source Operating Permit  
163-32776-00197

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:  
Jennifer Triplett, Environmental Compliance Source  
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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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*Michael R. Pence*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

May 2, 2013

TO: Evansville Vanderburg Public Library

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

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

**Applicant Name: PGP International Inc.**  
**Permit Number: 163-32776-00197**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	VHAUN 5/2/2013 PGP International Inc. 163-32776-00197 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		Chong Yang PGP International Inc. 351 Hanson Way Woodland CA 95776 (Source CAATS) Confirmed Delivery										
2		Evansville City Council and Mayors Office 1NW MLK Blvd, Rm 302 Evansville IN 47708 (Local Official)										
3		Vanderburgh County Commissioners 1 NW MLK Blvd, Rm 305 Evansville IN 47708 (Local Official)										
4		Evansville Vanderburg Public Library 200 SE Martin Luther King Jr. Blvd Evansville IN 47708-1694 (Library)										
5		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 (Affected Party)										
6		Vanderburgh County Health Dept. 420 Milberry Street Evansville IN 47713-1888 (Health Department)										
7		Kim Sherman 3355 Woodview Drive Newburgh IN 47630 (Affected Party)										
8		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 (Affected Party)										
9		Evansville EPA 100 E. Walnut St. Suite 100, Newsome Center Evansville IN 47713 (Local Official)										
10		David Boggs 216 Western Hills Dr Mt Vernon IN 47620 (Affected Party)										
11		Jennifer Triplett Environmental Compliance Source 2709 Charlestown Rd. New Albany In 47150 (Consultant)										
12		Great Lakes Power Products 5405 Foundation Drive Evansville IN 47725 (Affected Party)										
13		Graham Packaging 5504 Foundation Drive Evansville IN 47725 (Affected Party)										
14		Cortega Group, Inc. 15220 Foundation Avenue Evansville IN 47725 (Affected Party)										
15		Resident 15401 Petersburg Road Evansville IN 47725 (Affected Party)										

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<b>14</b>			

# Mail Code 61-53

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Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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1		Melinda Paul General Manager HSMF, LLC 12835 Saint Wendel Road Evansville IN 47720 (Affected Party)										
2		John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
3												
4												
5												
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7												
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9												
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