**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**
*We Protect Hoosiers and Our Environment.*
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

**Michael R. Pence**
*Governor*

**Thomas W. Easterly**
*Commissioner*

TO: Interested Parties / Applicant

DATE: July 25, 2013

RE: PacMoore Process Technologies/109-33209-00062

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.dot 6/13/13

IDEM

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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*Commissioner*

Scott Evans
PacMoore Process Technologies
100 PacMoore Parkway
Mooresville, IN 46158

July 25, 2013

Re: 109-33209-00062
First Significant Revision to
F109-30338-00062

Dear Mr. Evans;

PacMoore Process Technologies was issued a Federally Enforceable State Operating Permit (FESOP) No. F109-30338-00062 on July 29, 2011 for a stationary dry food grade materials manufacturing source located at 100 PacMoore Pkwy, Mooresville, IN 46158. On May 15, 2013, the Office of Air Quality (OAQ) received an application from the source requesting to add two (2) receiving bins and one (1) grinding mill. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
   The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
   Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval 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.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Deena Patton of my staff at 317-234-5400 or 1-800-451-6027, and ask for extension 4-5400.

Sincerely,

Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

NB /DP

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

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*Governor*

**Thomas W. Easterly**
*Commissioner*

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

## PacMoore Process Technologies
## 100 PacMoore Pkwy
## Mooresville, Indiana 46158

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

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

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

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

| Operation Permit No. F109-30338-00062 | |
|---|---|
| Original signed by:<br>Alfred C. Dumaual, Ph. D., Section Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: July 29, 2011<br><br>Expiration Date: July 29, 2016 |

First Administrative Amendment No. F109-33076-00062, issued June 11, 2013

| First Significant Permit Revision No. F109-33209-00062 | |
|---|---|
| Issued by:<br><br>Nathan C. Bell, Section Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: July 25, 2013<br><br>Expiration Date: July 29, 2016 |

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## SECTION A SOURCE SUMMARY

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

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

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

| | |
|---|---|
| Source Address: | 100 PacMoore Pkwy, Mooresville, Indiana 46158 |
| General Source Phone Number: | (317) 831-2666 |
| SIC Code: | 2099 |
| County Location: | Morgan |
| Source Location Status: | Nonattainment for PM2.5 standard<br>Attainment for all other criteria pollutants |
| Source Status: | Federally Enforceable State Operating Permit Program<br>Minor Source, under PSD and Emission Offset Rules<br>Minor Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

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

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

(a) One (1) Blend Room, identified as Blend Room 1, constructed in 2006, permitted in 2011, consisting of a sifter, mixer, and packaging station, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour with a baghouse, identified as BH1, to control particulate matter emissions from the sifter and a baghouse, identified as BH2, to control particulate matter emissions from the packaging stations, both baghouses vent indoors;

(b) One (1) Blend Room, identified as Blend Room 2, constructed in 2006, permitted in 2011, consisting of a sifter, mixer, and packaging station, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour with a baghouse, identified as BH3, to control particulate matter from the sifter and a baghouse, identified as BH4, to control particulate matter emissions from the packaging station, both baghouses vent indoors;

(c) One (1) Re-Pack Room, identified as Re-Pack Room 3, constructed in 2010, permitted in 2011, consisting of a sifter, mixer, and packaging station, with a maximum throughput capacity of 12,500 lbs of dry food-grade materials/hour with a baghouse, identified as BH5, to control particulate matter emissions from the sifter and a baghouse, identified as BH6, to control particulate matter emission from the packaging station, both baghouses vent indoors;

(d) One (1) Re-Pack Room, identified as Re-Pack Room 2, constructed in 2006, permitted in 2011, consisting of a sifter, mixer, and packaging station, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour with a baghouse, identified as BH7, to control particulate emission from the sifter and a baghouse, identified as BH8, to control particulate matter emissions from the packaging station, both baghouses vent indoors;

(e) One (1) Bulk Loadout, identified as Bulk Loadout, constructed in 2006, permitted in 2011, consisting of a sifter, mixer, and packaging station, with a maximum throughput capacity of 10,000 lbs dry food-grade materials/hour with a baghouse, identified as BH9, to control

particulate matter emissions from the sifter and a baghouse, identified as BH10, to control particulate matter emissions from the packaging station, both baghouses vent indoors;

(f) One (1) Rail/Truck Unloading, identified as Rail/Truck Unloading, constructed in 2006, permitted in 2011, with a maximum throughput capacity of 10,000 lbs dry food-grade materials/hour, with materials conveyed to a silo equipped with a bin vent, identified as BV1, venting indoors, and materials transferred to a packaging station controlled by a baghouse, identified as BH11, venting indoors;

(g) One (1) Bailer, identified as Bailer, constructed in 2006, permitted in 2011, to compact a maximum capacity of 12,500 lbs of used product bags with a baghouse, identified as BH12, to control particulate matter emission, venting outdoors;

(h) One (1) Pilot Spray Dryer, identified as Pilot Spray Dryer, constructed in 2007, permitted in 2011, with a maximum throughput capacity of 60 lbs dry food-grade materials/hour, consisting of an electric heater, cyclone to collect final product and a baghouse, identified as BH14 to control particulate emission, venting outdoors;

(i) One (1) Spray Dryer, identified as Spray Dryer 1, approved for construction in 2011, with a maximum throughput capacity of 5,000 lbs dry food-grade materials/hour, consisting of a 6.4 MMBtu/hr natural gas-fired dryer with low-NOx burners, cyclone to collect final product, and a baghouse, identified as BH13, to control particulate emissions, venting outdoors;

(j) One (1) receiving bin, identified as Small Receiving Bin, constructed in 2013, with a maximum capacity of 200 lbs dry food grade materials, with a baghouse, identified as BH15, to control particulate matter emissions, and venting outdoors.

(k) One (1) receiving bin, identified as Large Receiving Bin, constructed in 2013, with a maximum capacity of 1,500 lbs dry food grade materials, with a baghouse, identified as BH16, to control particulate matter emissions, venting outdoors.

(l) One (1) grinding mill, identified as Grinding Mill 1, constructed in 2013, with a maximum throughput capacity of 1,500 lbs dry food grade materials/hour, with particulate matter emissions routed to large receiving bin.

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

This stationary source also includes the following insignificant activities:

(a) One (1) boiler, identified as boiler 1, constructed in 2006, permitted in 2011, with a maximum heat input capacity of 0.2 MMBtu/hr;

(b) One (1) water heater, constructed in 2006, permitted in 2011, with a maximum heat input capacity of 0.66 MMBtu/hr; and

(c) Paved roads with no controls.

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

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

## SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

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

(a) This permit, F109-30338-00062, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

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

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

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

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM,

OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

(a) All terms and conditions of permits established prior to F109-30338-00062 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

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

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

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

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

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

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

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

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

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

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

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

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

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

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

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

**SECTION C** **SOURCE OPERATION CONDITIONS**

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of $CO_2$ equivalent emission ($CO_2e$) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

C.9 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

## C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

## C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

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

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

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

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

Records of required monitoring information include the following, where applicable:

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

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

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

(b) The address for report submittal is:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise

specified in this permit. For the purpose of this permit, “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

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

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

(a) One (1) Blend Room, identified as Blend Room 1, constructed in 2006, permitted in 2011, consisting of a sifter, mixer, and packaging station, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour with a baghouse, identified as BH1, to control particulate matter emissions from the sifter and a baghouse, identified as BH2, to control particulate matter emissions from the packaging stations, both baghouses vent indoors;

(b) One (1) Blend Room, identified as Blend Room 2, constructed in 2006, permitted in 2011, consisting of a sifter, mixer, and packaging station, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour with a baghouse, identified as BH3, to control particulate matter from the sifter and a baghouse, identified as BH4, to control particulate matter emissions from the packaging station, both baghouses vent indoors;

(c) One (1) Re-Pack Room, identified as Re-Pack Room 31, constructed in 2010, permitted in 2011, consisting of a sifter, mixer, and packaging station, with a maximum throughput capacity of 12,500 lbs of dry food-grade materials/hour with a baghouse, identified as BH5, to control particulate matter emissions from the sifter and a baghouse, identified as BH6, to control particulate matter emission from the packaging station, both baghouses vent indoors;

(d) One (1) Re-Pack Room, identified as Re-Pack Room 2, constructed in 2006, permitted in 2011, consisting of a sifter, mixer, and packaging station, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour with a baghouse, identified as BH7, to control particulate emission from the sifter and a baghouse, identified as BH8, to control particulate matter emissions from the packaging station, both baghouses vent indoors;

(e) One (1) Bulk Loadout, identified as Bulk Loadout, constructed in 2006, permitted in 2011, consisting of a sifter, mixer, and packaging station, with a maximum throughput capacity of 10,000 lbs dry food-grade materials/hour with a baghouse, identified as BH9, to control particulate matter emissions from the sifter and a baghouse, identified as BH10, to control particulate matter emissions from the packaging station, both baghouses vent indoors;

(f) One (1) Rail/Truck Unloading, identified as Rail/Truck Unloading, constructed in 2006, permitted in 2011, with a maximum throughput capacity of 10,000 lbs dry food-grade materials/hour, with materials conveyed to a silo equipped with a bin vent, identified as BV1, venting indoors, and materials transferred to a packaging station controlled by a baghouse, identified as BH11, venting indoors;

(g) One (1) Bailer, identified as Bailer, constructed in 2006, permitted in 2011, to compact a maximum capacity of 12,500 lbs of used product bags with a baghouse, identified as BH12, to control particulate matter emission, venting indoors;

(h) One (1) Pilot Spray Dryer, identified as Pilot Spray Dryer, constructed in 2007, permitted in 2011, with a maximum throughput capacity of 60 lbs dry food-grade materials/hour, consisting of an electric heater, cyclone to collect final product and a baghouse, identified as BH14 to control particulate emission, venting outdoors;

(i) One (1) Spray Dryer, identified as Spray Dryer 1, approved for construction in 2011, with a maximum throughput capacity of 5,000 lbs dry food-grade materials/hour, consisting of a 6.4 MMBtu/hr natural gas-fired dryer with low-NOx burners, cyclone to collect final product, and a baghouse, identified as BH13, to control particulate emissions, venting outdoors;

(j) One (1) receiving bin, identified as Small Receiving Bin, constructed in 2013, with a maximum capacity of 200 lbs dry food grade materials, with a baghouse, identified as BH15, to control

particulate matter emissions, and venting outdoors.

(k) One (1) receiving bin, identified as Large Receiving Bin, constructed in 2013, with a maximum capacity of 1,500 lbs dry food grade materials, with a baghouse, identified as BH16, to control particulate matter emissions, venting outdoors.

(l) One (1) grinding mill, identified as Grinding Mill 1, constructed in 2013, with a maximum throughput capacity of 1,500 lbs dry food grade materials/hour, with particulate matter emissions routed to large receiving bin.

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

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

D.1.1 Particulate Emission Limitations [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-1.1-5]

In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable and pursuant to 326 IAC 2-8-4 (FESOP), the PM, PM10, and PM2.5 emissions from the Blend Rooms, Re-Pack Rooms, Bulk Loadout, Rail/Truck Unloading, Bailer, the Spray Dryers, the Receiving Bins, and Grinding Mill shall not exceed the emission limits listed in the table below:

| Unit | Control Device | PM/PM10/PM2.5 Emission Limit (lbs/hr) |
|---|---|---|
| Blend Room 1 | BH1 | 1.245 |
| Blend Room 1 | BH2 | 1.245 |
| Blend Room 2 | BH3 | 1.245 |
| Blend Room 2 | BH4 | 1.245 |
| Re-Pack Room 3 | BH5 | 1.245 |
| Re-Pack Room 3 | BH5 | 1.245 |
| Re-Pack Room 2 | BH7 | 1.245 |
| Re-Pack Room 2 | BH7 | 1.245 |
| Bulk Loadout | BH9 | 1.245 |
| Bulk Loadout | BH10 | 1.245 |
| Rail/Truck | BV1 | 0.343 |
| Rail/Truck | BH11 | 1.245 |
| Bailer | BH12 | 1.245 |
| Pilot Spray Dryer | BH14 | 0.010 |
| Spray Dryer 1 | BH13 | 0.080 |
| Small Receiving Bin | BH15 | 0.042 |
| Large Receiving Bin and Grinding Mill | BH16 | 0.943 |

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

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

D.1.2 Particulate Emissions Limitations.for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate from Blend Rooms, Re-Pack Rooms, Bulk Loadout, Rail/Truck Unloading, Bailer, the Spray Dryers, the Receiving Bins, and Grinding Mill shall be limited by the following:

| Process (Control Device) | Maximum Process Weight Rate (tons/hr) | 326 IAC 6-3-2 Allowable Particulate Emissions (lbs/hr) |
|---|---|---|
| Blend Room 1 (BH1) | 3.13 | 8.81 |
| Blend Room 1 (BH2) | 3.13 | 8.81 |
| Blend Room 2 (BH3) | 3.13 | 8.81 |
| Blend Room 2 (BH4) | 3.13 | 8.81 |
| Re-Pack Room 3 (BH5) | 6.25 | 14.00 |
| Re-Pack Room 3 (BH6) | 6.25 | 14.00 |
| Re-Pack Room 2 (BH7) | 6.25 | 14.00 |
| Re-Pack Room 2 (BH8) | 6.25 | 14.00 |
| Bulk Loadout (BH9) | 5.00 | 12.05 |
| Bulk Loadout (BH10) | 5.00 | 12.05 |
| Rail/Truck Unloading (BH11) | 5.00 | 12.05 |
| Rail/Truck Unloading (BV1) | 5.00 | 12.05 |
| Bailer (BH12) | 6.25 | 14.00 |
| Pilot Spray Dryer (BH14) | 0.03 | 0.551 |
| Spray Dryer 1 (BH13) | 2.50 | 7.58 |
| Small Receiving Bin (BH15) | 0.75 | 3.38 |
| Large Receiving Bin and Grinding Mill (BH16) | 0.75 | 3.38 |

The pound per hour limitations were calculated with the following equation:

Interpolation of the data in the table in 326 IAC 6-3-2(e)(2) for the process weight rates up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

When the process weight rate is less than one hundred (100) pounds per hour, the allowable rate of emission is five hundred fifty-one thousandths (0.551) pound per hour.

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

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

**Compliance Determination Requirements**

D.1.4 Particulate Control

(a) In order to comply with Conditions D.1.1 and D.1.2, each of the following emission units shall be controlled at all times by the associated baghouses listed below at all times that the associated processes are in operation:

| Process | Baghouse |
|---|---|
| Blend Room 1 | BH1 and BH2 |
| Blend Room 2 | BH3 and BH4 |
| Re-Pack Room 3 | BH5 and BH6 |
| Re-Pack Room 2 | BH7 and BH8 |

| Process | Baghouse |
|---|---|
| Bulk Loadout | BH9 and BH10 |
| Rail/Truck Unloading | BV1 and BH11 |
| Bailer | BH12 |
| Pilot Spray Dryer | BH14 |
| Spray Dryer 1 | BH13 |
| Small Receiving Bin | BH15 |
| Large Receiving Bin and Grinding Mill | BH16 |

(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 2-8-4][326 IAC 2-8-5(a)(1)]**

D.1.5 Visible Emission Notations

(a) Visible emission notations from the baghouses stack exhausts BH 13, BH14, BH15, and BH16 shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C- Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.6 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse used in conjunction with the Spray Dryer 1 (BH13) at least once per day when Baghouses BH13 is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take reasonable response. The normal range for this unit is a pressure drop between 0.2 and 10 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.7 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

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

D.1.8 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.5, the Permittee shall maintain records of visible emission notations baghouses exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of the visible emission notation (e.g., the process did not operate that day).

(b) To document the compliance status with Condition D.1.6, the Permittee shall maintain daily records of the pressure drop across the baghouse used in conjunction with the Spray Dryer 1 (BH13) during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).

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

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

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

(a) One (1) boiler, identified as boiler 1, constructed in 2006, permitted in 2011, with a maximum heat input capacity of 0.2 MMBtu/hr;

(b) One (1) water heater, constructed in 2006, permitted in 2011, with a maximum heat input capacity of 0.66 MMBtu/hr; and

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

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

D.2.1 Particulate Emission Limitations [326 IAC 6-2]

Pursuant to 326 IAC 6-2-4(a), particulate emissions from the natural gas water heater and boiler shall not exceed 0.6 pound per MMBtu of heat input.

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

## FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: PacMoore Process Technologies
Source Address: 100 PacMoore Pkwy, Mooresville, Indiana 46158
FESOP Permit No.: F109-30338-00062

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

Please check what document is being certified:

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

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

| |
|---|
| Signature: |
| Printed Name: |
| Title/Position: |
| Date: |

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

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

Source Name: PacMoore Process Technologies
Source Address: 100 PacMoore Pkwy, Mooresville, Indiana 46158
FESOP Permit No.: F109-30338-00062

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

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

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

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

Source Name: PacMoore Process Technologies
Source Address: 100 PacMoore Pkwy, Mooresville, Indiana 46158
FESOP Permit No.: F109-30338-00062

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



This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B- Emergency Provisions satisfies the reported requirements of paragraph (1) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

PacMoore Process Technologies
100 PacMoore Pkwy
Mooresville, Indiana 46158

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 Process Technologies , 100 PacMoore Pkwy, Mooresville, Indiana 46158, has constructed and will operated a stationary dry food-grade manufacturing source in conformity with the requirements and intent of the permit application received by the Office of Air Quality on March 11, 2011 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F109-30338-00062, Plant ID No. 109-00062 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 Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

### Source Description and Location

| | |
|---|---|
| **Source Name:** | **PacMoore Process Technologies** |
| **Source Location:** | **100 PacMoore Pkwy, Mooresville, IN 46158** |
| **County:** | **Morgan** |
| **SIC Code:** | **2099 (Food Preparations, Not Elsewhere Classified)** |
| **Operation Permit No.:** | **F 109-30338-00062** |
| **Operation Permit Issuance Date:** | **July 29, 2011** |
| **Significant Permit Revision No.:** | **109-33209-00062** |
| **Permit Reviewer:** | **Deena Patton** |

On May 15, 2013, the Office of Air Quality (OAQ) received an application from PacMoore Process Technologies related to a modification to an existing stationary dry food grade materials manufacturing facility.

### Existing Approvals

The source was issued FESOP No. 109-30338-00062 on July 29, 2011. The source has since received Administrative Amendment No. 109-33076-00062, issued on June 11, 2013.

### County Attainment Status

The source is located in Morgan County.

| Pollutant | Designation |
|---|---|
| $SO_2$ | Better than national standards. |
| CO | Unclassifiable or attainment effective November 15, 1990. |
| O3 | Attainment effective October 19, 2007, for the 8-hour ozone standard.[1] |
| $PM_{10}$ | Unclassifiable effective November 15, 1990. |
| $NO_2$ | Cannot be classified or better than national standards. |
| Pb | Not designated. |
| [1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.<br>Basic nonattainment designation effective federally April 5, 2005, for $PM_{2.5}$. | |

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

(b) $PM_{2.5}$
U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Morgan County as nonattainment for $PM_{2.5}$. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air

Act, the OAQ is following the U.S. EPA's New Source Review Rule for $PM_{2.5}$ promulgated on May 8, 2008. These rules became effective on July 15, 2008. Therefore, direct $PM_{2.5}$ and $SO_2$ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants
Morgan County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

## Fugitive Emissions

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

## Status of the Existing Source

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

This PTE table is from the TSD or Appendix A of 109-30338-00062, issued on July 29, 2011.

| | **Potential To Emit of the Entire Source Prior to Revision (tons/year)** | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| Process/ Emission Unit | PM | PM10 | PM2.5 | $SO_2$ | NOx | VOC | CO | GHGs as $CO_2e$** | Total HAPs | Worst Single HAP |
| Boiler/Water Heater | 7.0E-3 | 0.03 | 0.03 | 2.2E-3 | 0.37 | 0.02 | 0.31 | 446 | 7.0E-3 | 6.7E-3 (Hexane) |
| Spray Dryer (combustion) | 0.05 | 0.21 | 0.21 | 0.02 | 1.37 | 0.15 | 2.31 | 3318 | 0.05 | 0.05 (Hexane) |
| Blend Room 1 and 2, Re-pack Room 3 and 2, Bulk Loadout, Rail/Truck, Bailer, Pilot Spray Dryer, and Spray Dryer 1 | 67.34 | 67.34 | 67.34 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| **Total PTE of Non-Fugitive Emissions** | **67.39** | **67.58** | **67.58** | **0.02** | **1.74** | **0.15** | **2.62** | **3764** | **0.06** | **0.06 (Hexane)** |
| Title V Major Source Thresholds** | NA | 100 | 100 | 100 | 100 | 100 | 100 | 100,000 | 25 | 10 |
| PSD Major Source Thresholds** | 250 | 250 | NA | 250 | 250 | 250 | 250 | 100,000 | NA | NA |
| Emission Offset/ Nonattainment NSR Major Source Thresholds | NA | NA | 100 | NA | Na | NA | NA | NA | NA | NA |
| Fugitive Emissions Paved Roads | 0.47 | 0.09 | 0.02 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

These emissions are based upon F109-30338-00062. The PTE of Paved Roads has been updated to included corrected values.
**The 100,000 $CO_2e$ threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

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

(b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3), because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.

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

## Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by PacMoore Process Technologies on May 15, 2013, relating to the addition of two (2) receiving bins and one (1) grinding mill.

The following is a list of the unpermitted emission units:

(a) One (1) receiving bin, identified as Small Receiving Bin, constructed in 2013, with a maximum capacity of 200 lbs dry food grade materials, with a baghouse, identified as BH15, to control particulate matter emissions, and venting outdoors.

(b) One (1) receiving bin, identified as Large Receiving Bin, constructed in 2013, with a maximum capacity of 1,500 lbs dry food grade materials, with a baghouse, identified as BH16, to control particulate matter emissions, venting outdoors.

(c) One (1) grinding mill, identified as Grinding Mill 1, constructed in 2013, with a maximum throughput capacity of 1,500 lbs dry food grade materials/hour, with particulate matter emissions routed to large receiving bin.

## Enforcement Issues

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

## Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

## Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Process/ Emission Unit | PTE of Proposed Revision (tons/year) | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | PM | PM10 | PM2.5 | $SO_2$ | NOx | VOC | CO | GHGs as $CO_2e$ | Total HAPs | Worst Single HAP |
| Receiving Bins | 215.65 | 215.65 | 215.65 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| **Total PTE of Proposed Revision** | **215.65** | **215.65** | **215.65** | **0.0** | **0.0** | **0.0** | **0.0** | **0.0** | **0.0** | **0.0** |

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the construction of new emission units with potential to emit greater than or equal to twenty-five (25) tons per year of PM, PM10, or direct PM2.5.

Pursuant to 326 IAC 2-8-11.1(g), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision requires adjustment of the FESOP emission limitations.

**PTE of the Entire Source After Issuance of the FESOP Revision**

The table below summarizes the potential to emit of the entire source reflecting adjustment of existing limits, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

| Process/ Emission Unit | **Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)** | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | PM | PM10* | PM2.5* | $SO_2$ | NOx | VOC | CO | GHGs as $CO_2e$** | Total HAPs | Worst Single HAP |
| Boiler/Water Heater | 0.007 | 0.03 | 0.03 | 2.2E-3 | 0.37 | 0.02 | 0.31 | 446 | 7.0E-3 | 6.6E-3 (Hexane) |
| Spray Dryer (combustion) | 0.05 | 0.21 | 0.21 | 0.02 | 2.75 | 0.15 | 2.31 | 3,318 | 0.05 | 0.05 (Hexane) |
| Blend Room 1and 2, Re-pack Room 3 and 2, Bulk Loadout, Rail/Truck, Bailer, Pilot Spray Dryer, and Spray Dryer 1 | 67.34 | 67.34 | 67.34 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| **Receiving Bins** | **4.31** | **4.31** | **4.31** | **0.0** | **0.0** | **0.0** | **0.0** | **0.0** | **0.0** | **0.0** |
| Total PTE of Non-fugitive Emissions | ~~67.39~~ **71.71** | ~~67.58~~ **71.89** | ~~67.58~~ **71.89** | 0.02 | 3.12 | 0.17 | 2.62 | 3,764 | 0.06 | 0.06 (Hexane) |
| Title V Major Source Thresholds** | NA | 100 | 100 | 100 | 100 | 100 | 100 | 100,000 | 25 | 10 |
| PSD Major Source Thresholds** | 250 | 250 | NA | 250 | 250 | 250 | 250 | 100,000 | NA | NA |
| Emission Offset/ Nonattainment NSR Major Source Thresholds | NA | NA | 100 | NA | NA | NA | NA | NA | NA | NA |
| Fugitive Emissions Paved Roads | 0.09 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 (NA) |

*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
**The 100,000 $CO_2e$ threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted)

| Process/ Emission Unit | Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year) | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | PM | PM10* | PM2.5* | $SO_2$ | NOx | VOC | CO | GHGs as $CO_2e$** | Total HAPs | Worst Single HAP |
| Boiler/Water Heater | 0.007 | 0.03 | 0.03 | 2.2E-3 | 0.37 | 0.02 | 0.31 | 446 | 7.0E-3 | 6.6E-3 (Hexane) |
| Spray Dryer (combustion) | 0.05 | 0.21 | 0.21 | 0.02 | 2.75 | 0.15 | 2.31 | 3,318 | 0.05 | 0.05 (Hexane) |
| Blend Room 1and 2, Re-pack Room 3 and 2, Bulk Loadout, Rail/Truck, Bailer, Pilot Spray Dryer, and Spray Dryer 1 | 67.34 | 67.34 | 67.34 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Receiving Bins | 4.31 | 4.31 | 4.31 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| **Total PTE of Non-fugitive Emissions** | **71.71** | **71.89** | **71.89** | **0.02** | **3.12** | **0.17** | **2.62** | **3,764** | **0.06** | **0.06 (Hexane)** |
| Title V Major Source Thresholds** | NA | 100 | 100 | 100 | 100 | 100 | 100 | 100,000 | 25 | 10 |
| PSD Major Source Thresholds** | 250 | 250 | NA | 250 | 250 | 250 | 250 | 100,000 | NA | NA |
| Emission Offset/ Nonattainment NSR Major Source Thresholds | NA | NA | 100 | NA | NA | NA | NA | NA | NA | NA |
| Fugitive Emissions Paved Roads | 0.09 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 (NA) |

*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
**The 100,000 $CO_2e$ threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

FESOP Status, PSD Minor Source, and Emission Offset Minor Source

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the source shall comply with the following:

| Unit | Control Device | PM/PM10/PM2.5 Emission Limit (lbs/hr) |
|---|---|---|
| Small Receiving Bin | BH15 | 0.042 |
| Large Receiving Bin and Grinding Mill | BH16 | 0.943 |

Compliance with these limits, combined with the potential to emit PM/PM10/PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM/PM10/PM2.5 to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 2-3 (Emission Offset), and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable.

This modification to an existing Emission Offset minor stationary source will not change the Emission Offset minor status, because the potential to emit of all nonattainment regulated pollutants from the entire source will continue to be less than the Emission Offset major source threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

## 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 for this proposed revision, since this source is not considered a grain elevator as defined in section 60.301 of Subpart DD. This source operates a dry food grade manufacturing process to sift, blend, dry, extrude, and repackage ingredients and products such as starch, protein, gum, and fiber for the food, retail, and pharmaceutical markets.

(b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Pharmaceuticals Production, 40 CFR 63.1250, Subpart GGG (326 IAC 20-57), are not included for this proposed revision, since this source is not a pharmaceutical manufacturing operation as defined in section 63.1251.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Manufacturing of Nutritional Yeast, 40 CFR 63.2130, Subpart CCCC (326 IAC 20-51), are not included for this proposed revision, since this source does not manufacture nutritional yeast.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Solvent Extraction for Vegetable Oil Production, 40 CFR 63.2830, Subpart GGGG (326 IAC 20-60), are not included for this proposed revision, since this source does not produce vegetable oil.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Sources: Prepared Feeds Manufacturing, 40 CFR 63.11619, Subpart DDDDDDD (7D), are not included for this proposed revision, since this source does not own or operate a prepared feeds manufacuturing facility that uses a material containing chromium or a material containing manganese.

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

Compliance Assurance Monitoring (CAM)

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

## State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

(a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less

than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

(c) 326 IAC 2-3 (Emission Offset) and (for PM2.5 nonattainment counties) 326 IAC 2-1.1-5 (Nonattainment New Source Review)
This modification to an existing Emission Offset minor stationary source will not change the Emission Offset minor status, because the potential to emit of all nonattainment regulated pollutants from the entire source will continue to be less than the Emission Offset major source threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

This modification to an existing minor stationary source under 326 IAC 2-1.1-5 (Nonattainment New Source Review) will not change the minor status, because the potential to emit of PM2.5 from the entire source will continue to be less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

(d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(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 forty percent (40%) 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)
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 6-5 (Fugitive Particulate Matter Emission Limitations)
Due to this revision, the source is not subject to the requirements of 326 IAC 6-5, because the paved roads do not have potential fugitive particulate emissions greater than 25 tons per year.

(i) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

(j) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Receiving Bins and Grinding Mill

(k) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the receiving bins and grinding mill shall be limited by the following:

| Process (Control Device) | Maximum Process Weight Rate (tons/hr) | 326 IAC 6-3-2 Allowable Particulate Emissions (lbs/hr) | Uncontrolled PTE of PM (lbs/hr) | Controlled PTE of PM (lbs/hr) | Controls Required to Meet Limit |
|---|---|---|---|---|---|
| Small Receiving Bin (BH15) | 0.75 | 3.38 | 2.09 | 0.042 | No |
| Large Receiving Bin and Grinding Mill (BH16) | 0.75 | 3.38 | 47.14 | 0.943 | Yes |

The pound per hour limitation was calculated with the following equation:

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

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

The baghouse BH16 shall be in operation at all times the Large Receiving Bin and Grinding Mill are in operation, in order to comply with this limit.

(l) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The proposed revision is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each new unit is less than twenty-five (25) tons per year.

(m) There are no other 326 IAC 8 Rules that are applicable to the receiving bins and grinding mill.

**Compliance Determination, Monitoring and Testing Requirements**

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

| Emission Unit/Control | Operating Parameters | Frequency | Excursions and Exceedances |
|---|---|---|---|
| Baghouses (BH15 and BH16) | Visible Emissions | Daily | Response Steps |

(b) There are no testing requirements applicable to this proposed revision.

The existing compliance requirements for the other emission units at this source will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No. F109-30338-00062, issued on July 29, 2011.

**Proposed Changes**

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

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

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

(a) One (1) Blend Room, identified as Blend Room 1, constructed in 2006, permitted in 2011, consisting of a sifter, mixer, and packaging station, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour with a baghouse, identified as BH1, to control particulate matter emissions from the sifter and a baghouse, identified as BH2, to control particulate matter emissions from the packaging stations, both baghouses vent indoors;

...

**(j) One (1) receiving bin, identified as Small Receiving Bin, constructed in 2013, with a maximum capacity of 200 lbs dry food grade materials, with a baghouse, identified as BH15, to control particulate matter emissions, and venting outdoors.**

**(k) One (1) receiving bin, identified as Large Receiving Bin, constructed in 2013, with a maximum capacity of 1,500 lbs dry food grade materials, with a baghouse, identified as BH16, to control particulate matter emissions, venting outdoors.**

**(l) One (1) grinding mill, identified as Grinding Mill 1, constructed in 2013, with a maximum throughput capacity of 1,500 lbs dry food grade materials/hour, with particulate matter emissions routed to large receiving bin.**

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) Blend Room, identified as Blend Room 1, constructed in 2006, permitted in 2011, consisting of a sifter, mixer, and packaging station, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour with a baghouse, identified as BH1, to control particulate matter emissions from the sifter and a baghouse, identified as BH2, to control particulate matter emissions from the packaging stations, both baghouses vent indoors;

...

**(j) One (1) receiving bin, identified as Small Receiving Bin, constructed in 2013, with a maximum capacity of 200 lbs dry food grade materials, with a baghouse, identified as BH15, to control particulate matter emissions, and venting outdoors.**

**(k) One (1) receiving bin, identified as Large Receiving Bin, constructed in 2013, with a maximum capacity of 1,500 lbs dry food grade materials, with a baghouse, identified as BH16, to control particulate matter emissions, venting outdoors.**

**(l) One (1) grinding mill, identified as Grinding Mill 1, constructed in 2013, with a maximum throughput capacity of 1,500 lbs dry food grade materials/hour, with particulate matter emissions routed to large receiving bin.**

...

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

D.1.1 Particulate Emission Limitations [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-1.1-5]

In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable and pursuant to 326 IAC 2-8-4 (FESOP), the PM, PM10, and PM2.5 emissions from the Blend Rooms, Re-Pack Rooms, Bulk Loadout, Rail/Truck Unloading, Bailer, ~~and~~ the Spray Dryers**, the Receiving Bins, and Grinding Mill** shall not exceed the emission limits listed in the table below:

| Unit | Control Device | PM/PM10/PM2.5 Emission Limit (lbs/hr) |
|---|---|---|
| Blend Room 1 | BH1 | 1.24**5** |
| Blend Room 1 | BH2 | 1.24**5** |
| Blend Room 2 | BH3 | 1.24**5** |
| Blend Room 2 | BH4 | 1.24**5** |
| Re-Pack Room 3 | BH5 | 1.24**5** |
| Re-Pack Room 3 | BH5 | 1.24**5** |
| Re-Pack Room 2 | BH7 | 1.24**5** |
| Re-Pack Room 2 | BH7 | 1.24**5** |
| Bulk Loadout | BH9 | 1.24**5** |
| Bulk Loadout | BH10 | 1.24**5** |
| Rail/Truck | BV1 | 0.34**3** |
| Rail/Truck | BH11 | 1.24**5** |
| Bailer | BH12 | 1.24**5** |
| Pilot Spray Dryer | BH14 | 0.01**0** |
| Spray Dryer 1 | BH13 | 0.08**0** |
| **Small Receiving Bin** | **BH15** | **0.042** |
| **Large Receiving Bin and Grinding Mill** | **BH16** | **0.943** |

...

D.1.2 Particulate Emissions Limitations.for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate from Blend Rooms, Re-Pack Rooms, Bulk Loadout, Rail/Truck Unloading, Bailer, ~~and~~ the Spray Dryers, **the Receiving Bins, and Grinding Mill,** shall be limited by the following:

| Process (Control Device) | Maximum Process Weight Rate (tons/hr) | 326 IAC 6-3-2 Allowable Particulate Emissions (lbs/hr) |
|---|---|---|
| Blend Room 1 (BH1) | 3.13 | 8.81 |
| Blend Room 1 (BH2) | 3.13 | 8.81 |
| Blend Room 2 (BH3) | 3.13 | 8.81 |
| Blend Room 2 (BH4) | 3.13 | 8.81 |
| Re-Pack Room 3 (BH5) | 6.25 | 14.00 |
| Re-Pack Room 3 (BH6) | 6.25 | 14.00 |
| Re-Pack Room 2 (BH7) | 6.25 | 14.00 |
| Re-Pack Room 2 (BH8) | 6.25 | 14.00 |
| Bulk Loadout (BH9) | 5.00 | 12.05 |
| Bulk Loadout (BH10) | 5.00 | 12.05 |
| Rail/Truck Unloading (BH11) | 5.00 | 12.05 |
| Rail/Truck Unloading (BV1) | 5.00 | 12.05 |
| Bailer (BH12) | 6.25 | 14.00 |
| Pilot Spray Dryer (BH14) | 0.03 | 0.551 |
| Spray Dryer 1 (BH13) | 2.50 | 7.58 |

| | | |
|---|---|---|
| **Small Receiving Bin (BH15)** | **0.75** | **3.38** |
| **Large Receiving Bin and Grinding Mill (BH16)** | **0.75** | **3.38** |

...

Compliance Determination Requirements

D.1.4 Particulate Control

(a) In order to comply with Conditions D.1.1 and D.1.2, each of the following emission units shall be controlled at all times by the associated baghouses listed below at all times that the associated processes are in operation:

| Process | Baghouse |
|---|---|
| Blend Room 1 | BH1 and BH2 |
| Blend Room 2 | BH3 and BH4 |
| Re-Pack Room 3 | BH 5 and BH6 |
| Re-Pack Room 2 | BH7 and BH8 |
| Bulk Loadout | BH9 and BH10 |
| Rail/Truck Unloading | BV1 and BH11 |
| Bailer | BH12 |
| Pilot Spray Dryer | BH14 |
| Spray Dryer 1 | BH13 |
| **Small Receiving Bin** | **BH15** |
| **Large Receiving Bin and Grinding Mill** | **BH16** |

...

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

D.1.5 Visible Emission Notations

(a) Visible emission notations from the baghouses stack exhausts BH 13**,** ~~and~~ BH14**, BH15, and BH16** shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

...

## 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 May 15, 2013.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 109-33209-00062. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

## IDEM Contact

(a) Questions regarding this proposed permit can be directed to Deena Patton 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) 234-5400 or toll free at 1-800-451-6027 extension 4-5400.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**Appendix A: Emission Summary**

**Company Name:** PacMoore Process Technologies
**Source Address:** 100 PacMoore Pkwy, Mooresville, Indiana 46158
**Permit No:** F109-33209-00062
**Reviewer:** Deena Patton

| Uncontrolled/Unlimited Emissions (Before Revision) | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Emission Units** | **PM** | **$PM_{10}$** | **$PM_{2.5}$** | **$SO_2$** | **NOx** | **VOC** | **CO** | **GHGs** | **HAPs** | **Worst Case Single HAP** | |
| Boiler/Water heater | 7.0E-03 | 0.03 | 0.03 | 2.2E-03 | 0.37 | 0.02 | 0.31 | 446 | 7.0E-03 | 6.7E-03 | Hexane |
| Spray Dryer (combustion) | 0.05 | 0.21 | 0.21 | 0.02 | 1.37 | 0.15 | 2.31 | 3,318 | 0.05 | 0.05 | Hexane |
| Blend Room 1 and 2, Re-pack Room 3 and 2, Bulk Loadout, Rail/Truck, Bailer, Pilot Spray Dryer, and Spray Dryer 1 | 1200.84 | 1200.84 | 1200.84 | 0.00 | 0.00 | 0.00 | 0.00 | 0 | 0.00 | 0.00 | --- |
| **Total Non-Fugitive Emissions** | **1200.90** | **1201.08** | **1201.08** | **0.02** | **1.74** | **0.17** | **2.62** | **3,764** | **0.06** | **0.06** | **Hexane** |
| Paved Roads (fugitive) | 0.47 | 0.09 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0 | 0.00 | 0.00 | --- |
| **Total Fugitive Emissions** | **0.47** | **0.09** | **0.02** | **0.00** | **0.00** | **0.00** | **0.00** | 0 | **0.00** | **0.00** | **---** |

| Limited Emissions (Before Revision) | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Emission Units** | **PM** | **$PM_{10}$** | **$PM_{2.5}$** | **$SO_2$** | **NOx** | **VOC** | **CO** | **GHGs** | **HAPs** | **Worst Case Single HAP** | |
| Boiler/Water Heater | 7.0E-03 | 0.03 | 0.03 | 2.2E-03 | 0.37 | 0.00 | 0.31 | 446 | 7.0E-03 | 6.7E-03 | Hexane |
| Spray Dryer (combustion) | 0.05 | 0.21 | 0.21 | 0.02 | 1.37 | 0.15 | 2.31 | 3,318 | 0.05 | 0.05 | Hexane |
| Blend Room 1 and 2, Re-pack Room 3 and 2, Bulk Loadout, Rail/Truck, Bailer, Pilot Spray Dryer, and Spray Dryer 1 | 67.34 | 67.34 | 67.34 | 0.0 | 0.0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | --- |
| **Total Non-Fugitive Emissions** | **67.39** | **67.58** | **67.58** | **0.02** | **1.74** | **0.15** | **2.62** | **3,764** | **0.06** | **0.06** | **Hexane** |
| Paved Roads (fugitive) | 0.47 | 0.09 | 0.02 | 0.0 | 0.0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | -- |
| **Total Fugitive Emissions** | **0.47** | **0.09** | **0.02** | **0.0** | **0.0** | **0.0** | **0.0** | 0 | **0.0** | **0.0** | **--** |

| Uncontrolled/Unlimited Emissions (After Revision) | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Emission Units** | **PM** | **PM10** | **PM2.5** | **SO2** | **$NO_x$** | **VOC** | **CO** | **GHGs** | **HAPs** | **Worst Case Single HAP** | |
| Boiler/Water heater | 7.0E-03 | 0.03 | 0.03 | 2.2E-03 | 0.37 | 0.02 | 0.31 | 446 | 7.0E-03 | 6.6E-03 | Hexane |
| Spray Dryer (combustion) | 0.05 | 0.21 | 0.21 | 0.02 | 2.75 | 0.15 | 2.31 | 3,318 | 0.05 | 0.05 | Hexane |
| Blend Room 1 and 2, Re-pack Room 3 and 2, Bulk Loadout, Rail/Truck, Bailer, Pilot Spray Dryer, and Spray Dryer 1 | 1200.84 | 1200.84 | 1200.84 | 0.0 | 0.0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | -- |
| NEW- Receiving Bins | 215.65 | 215.65 | 215.65 | 0.0 | 0.0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | -- |
| **Total Non-Fugitive Emissions** | **1416.54** | **1416.72** | **1416.72** | **0.02** | **3.12** | **0.17** | **2.62** | **3,764** | **0.06** | **0.06** | **Hexane** |
| Paved Roads (fugitive) | 0.47 | 0.09 | 0.02 | 0.0 | 0.0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | -- |
| **Total Fugitive Emissions** | **0.47** | **0.09** | **0.02** | **0.0** | **0.0** | **0.0** | **0.0** | **0** | **0.0** | **0.0** | **--** |

| Controlled Emissions (After Revision) | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Emission Units** | **PM** | **PM10** | **PM2.5** | **SO2** | **$NO_x$** | **VOC** | **CO** | **GHGs** | **HAPs** | **Worst Case Single HAP** | |
| Boiler/Water heater | 7.0E-03 | 0.03 | 0.03 | 2.2E-03 | 0.37 | 0.02 | 0.31 | 446 | 7.0E-03 | 6.6E-03 | Hexane |
| Spray Dryer (combustion) | 0.05 | 0.21 | 0.21 | 0.02 | 2.75 | 0.15 | 2.31 | 3,318 | 0.05 | 0.05 | Hexane |
| Blend Room 1 and 2, Re-pack Room 3 and 2, Bulk Loadout, Rail/Truck, Bailer, Pilot Spray Dryer, and Spray Dryer 1 | 67.34 | 67.34 | 67.34 | 0.0 | 0.0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | -- |
| NEW- Receiving Bins | 4.31 | 4.31 | 4.31 | 0.0 | 0.0 | 0.0 | 0.0 | **0** | 0.0 | 0.0 | -- |
| **Total Non-Fugitive Emissions** | **71.71** | **71.89** | **71.89** | **0.02** | **3.12** | **0.17** | **2.62** | **3,764** | **0.06** | **0.06** | **Hexane** |
| Paved Roads (fugitive) | 0.43 | 0.09 | 0.02 | 0.0 | 0.0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | -- |
| **Total Fugitive Emissions** | **0.09** | **0.02** | **0.00** | **0.0** | **0.0** | **0.0** | **0.0** | **0** | **0.0** | **0.0** | **--** |

| Limited Emissions (After Revision) | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Emission Units** | **PM** | **PM10** | **PM2.5** | **SO2** | **$NO_x$** | **VOC** | **CO** | **GHGs** | **HAPs** | **Worst Case Single HAP** | |
| Boiler/Water heater | 7.0E-03 | 0.03 | 0.03 | 2.2E-03 | 0.37 | 0.02 | 0.31 | 446 | 7.0E-03 | 6.6E-03 | Hexane |
| Spray Dryer (combustion) | 0.05 | 0.21 | 0.21 | 0.02 | 2.75 | 0.15 | 2.31 | 3,318 | 0.05 | 0.05 | Hexane |
| Blend Room 1 and 2, Re-pack Room 3 and 2, Bulk Loadout, Rail/Truck, Bailer, Pilot Spray Dryer, and Spray Dryer 1 | 67.34 | 67.34 | 67.34 | 0.0 | 0.0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | -- |
| NEW- Receiving Bins | 4.31 | 4.31 | 4.31 | 0.0 | 0.0 | 0.0 | 0.0 | **0** | 0.0 | 0.0 | -- |
| **Total Non-Fugitive Emissions** | **71.71** | **71.89** | **71.89** | **0.02** | **3.12** | **0.17** | **2.62** | **3,764** | **0.06** | **0.06** | **Hexane** |
| Paved Roads (fugitive) | 0.43 | 0.09 | 0.02 | 0.0 | 0.0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | -- |
| **Total Fugitive Emissions** | **0.43** | **0.09** | **0.02** | **0.0** | **0.0** | **0.0** | **0.0** | **0** | **0.0** | **0.0** | -- |

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

**Company Name:** PacMoore Process Technologies
**Source Address:** 100 PacMoore Pkwy, Mooresville, Indiana 46158
**Permit No:** F109-33209-00062
**Reviewer:** Deena Patton

| Unit | Heat Input Capacity MMBtu/hr | HHV | Potential Throughput MMCF/yr |
|---|---|---|---|
| Water Heater | 0.66 | mmBtu | |
| Boiler | 0.20 | mmscf | |
| **Total** | **0.86** | 1020 | 7.4 |

| | Pollutant | | | | | | |
|---|---|---|---|---|---|---|---|
| | PM* | PM10* | direct PM2.5* | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMCF | 1.9 | 7.6 | 7.6 | 0.6 | 100 **see below | 5.5 | 84 |
| Potential Emission in tons/yr | 0.01 | 0.03 | 0.03 | 0.002 | 0.37 | 0.02 | 0.31 |

*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 1-03-006-0
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

**HAPs Calculations**

| | HAPs - Organics | | | | | |
|---|---|---|---|---|---|---|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene | **Total - Organics** |
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 | |
| Potential Emission in tons/yr | 7.8E-06 | 4.4E-06 | 2.8E-04 | 6.6E-03 | 1.3E-05 | **6.9E-03** |

| | HAPs - Metals | | | | | |
|---|---|---|---|---|---|---|
| | Lead | Cadmium | Chromium | Manganese | Nickel | **Total - Metals** |
| Emission Factor in lb/MMcf | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 | |
| Potential Emission in tons/yr | 1.8E-06 | 4.1E-06 | 5.2E-06 | 1.4E-06 | 7.8E-06 | **2.0E-05** |
| | | | | | **Total HAPs** | **7.0E-03** |
| | | | | | **Worst HAP** | **6.6E-03** |

Methodology is the same as above.

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

**Greenhouse Gas Calculations**

| | Greenhouse Gas | | |
|---|---|---|---|
| | CO2 | CH4 | N2O |
| Emission Factor in lb/MMcf | 120,000 | 2.3 | 2.2 |
| Potential Emission in tons/yr | 443 | 0.01 | 0.01 |
| Summed Potential Emissions in tons/yr | 443 | | |
| CO2e Total in tons/yr | 446 | | |

**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).

updated 2/13

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

**Company Name:** PacMoore Process Technologies
**Source Address:** 100 PacMoore Pkwy, Mooresville, Indiana 46158
**Permit No:** F109-33209-00062
**Reviewer:** Deena Patton

| Heat Input Capacity MMBtu/hr | HHV mmBtu / mmscf | Potential Throughput MMCF/yr |
|---|---|---|
| 6.4 | 1020 | 55.0 |

| | Pollutant | | | | | | |
|---|---|---|---|---|---|---|---|
| | PM* | PM10* | direct PM2.5* | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMCF | 1.9 | 7.6 | 7.6 | 0.6 | 100<br>**see below | 5.5 | 84 |
| Potential Emission in tons/yr | 0.05 | 0.21 | 0.21 | 0.02 | 2.75 | 0.15 | 2.31 |

*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 1-03-006-0
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

**HAPS Calculations**

| | HAPs - Organics | | | | | |
|---|---|---|---|---|---|---|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene | **Total - Organics** |
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 | |
| Potential Emission in tons/yr | 5.8E-05 | 3.3E-05 | 2.1E-03 | 0.05 | 9.3E-05 | **5.2E-02** |

| | HAPs - Metals | | | | | |
|---|---|---|---|---|---|---|
| | Lead | Cadmium | Chromium | Manganese | Nickel | **Total - Metals** |
| Emission Factor in lb/MMcf | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 | |
| Potential Emission in tons/yr | 1.4E-05 | 3.0E-05 | 3.8E-05 | 1.0E-05 | 5.8E-05 | **1.5E-04** |
| | | | | | **Total HAPs** | **0.05** |
| | | | | | **Worst HAP** | **0.05** |

Methodology is the same as above.

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

**Greenhouse Gas Calculations**

| | Greenhouse Gas | | |
|---|---|---|---|
| | CO2 | CH4 | N2O |
| Emission Factor in lb/MMcf | 120,000 | 2.3 | 2.2 |
| Potential Emission in tons/yr | 3,298 | 0.1 | 0.1 |
| Summed Potential Emissions in tons/yr | 3,298 | | |
| CO2e Total in tons/yr | 3,318 | | |

**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**
**Particulate Control Devices**

**Company Name:** PacMoore Process Technologies
**Source Address:** 100 PacMoore Pkwy, Mooresville, Indiana 46158
**Permit No:** F109-33209-00062
**Reviewer:** Deena Patton

| Baghouses | Air Flow Rate (dscfm) | Outlet Grain Loating (gr/dscf) | Control Efficiency (%) | Capture Efficiency (%) | $PM/PM_{10}/PM_{2.5}$ Controlled / Captured Emissions | | $PM/PM_{10}/PM_{2.5}$ Uncontrolled / Captured Emissions | | $PM/PM_{10}/PM_{2.5}$ Uncaptured Emissions | | $PM/PM_{10}/PM_{2.5}$ Limit | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | (lbs/hr) | (tons/yr) | (lbs/hr) | (tons/yr) | (lbs/hr) | (tons/yr) | (lbs/hr) | (tons/yr) |
| Blend Room 1 (BH1) | 2,000 | 0.02 | 98.00% | 95.00% | 0.34 | 1.50 | 17.14 | 75.09 | 0.90 | 3.95 | 1.245 | 5.45 |
| Blend Room 1 (BH2) | 2,000 | 0.02 | 98.00% | 95.00% | 0.34 | 1.50 | 17.14 | 75.09 | 0.90 | 3.95 | 1.245 | 5.45 |
| Blend Room 2 (BH3) | 2,000 | 0.02 | 98.00% | 95.00% | 0.34 | 1.50 | 17.14 | 75.09 | 0.90 | 3.95 | 1.245 | 5.45 |
| Blend Room 2 (BH4) | 2,000 | 0.02 | 98.00% | 95.00% | 0.34 | 1.50 | 17.14 | 75.09 | 0.90 | 3.95 | 1.245 | 5.45 |
| Re-pack Room 3 (BH5) | 2,000 | 0.02 | 98.00% | 95.00% | 0.34 | 1.50 | 17.14 | 75.09 | 0.90 | 3.95 | 1.245 | 5.45 |
| Re-pack Room 3 (BH6) | 2,000 | 0.02 | 98.00% | 95.00% | 0.34 | 1.50 | 17.14 | 75.09 | 0.90 | 3.95 | 1.245 | 5.45 |
| Re-pack Room 2 (BH7) | 2,000 | 0.02 | 98.00% | 95.00% | 0.34 | 1.50 | 17.14 | 75.09 | 0.90 | 3.95 | 1.245 | 5.45 |
| Re-pack Room 2 (BH8) | 2,000 | 0.02 | 98.00% | 95.00% | 0.34 | 1.50 | 17.14 | 75.09 | 0.90 | 3.95 | 1.245 | 5.45 |
| Bulk Loadout (BH9) | 2,000 | 0.02 | 98.00% | 95.00% | 0.34 | 1.50 | 17.14 | 75.09 | 0.90 | 3.95 | 1.245 | 5.45 |
| Bulk Loadout (BH10) | 2,000 | 0.02 | 98.00% | 95.00% | 0.34 | 1.50 | 17.14 | 75.09 | 0.90 | 3.95 | 1.245 | 5.45 |
| Truck Loadout (BH11) | 2,000 | 0.02 | 98.00% | 95.00% | 0.34 | 1.50 | 17.14 | 75.09 | 0.90 | 3.95 | 1.245 | 5.45 |
| Bailer (BH12) | 2,000 | 0.02 | 98.00% | 95.00% | 0.34 | 1.50 | 17.14 | 75.09 | 0.90 | 3.95 | 1.245 | 5.45 |
| Truck Loadout (BV1) | 2,000 | 0.02 | 98.00% | | 0.34 | 1.50 | 17.14 | 75.09 | | | 0.343 | 1.50 |
| **Baghouses (spray dryers)** | **Thoughput (lb/hr)** | | **Control Efficency (%)** | | **Controlled (lbs/hr)** | **Controlled (tons/yr)** | **Uncontrolled (lbs/hr)** | **Uncontrolled (tons/yr)** | | | | |
| Spray Dryer 1 (BH13) | 40 | | 99.80% | | 0.08 | 0.35 | 40.00 | 175.20 | | | 0.080 | 0.35 |
| Pilot Spray Dryer (BH14) | 0.48 | | 98.00% | | 0.01 | 0.04 | 0.48 | **2.10** | | | 0.010 | 0.04 |
| | | | | **Totals** | | **19.91** | | **1153.42** | | **47.42** | **15.37** | **67.34** |

| | | |
|---|---|---|
| **Potential to Emit Before Control (tons/yr):** | **1200.84** | **(Uncontrolled / Captured Emissions + Uncaptured Emissions)** |
| **Potential to Emit After Control (tons/yr):** | **67.34** | **(Controlled / Captured Emissions + Uncaptured Emissions)** |
| **Limited Potential to Emit (tons/yr):** | **67.34** | |

**Methodology** for Baghouses BH1 through BH12 plus Bin Vent BV1

Controlled/Captured Emissions (lbs/hr) = [Outlet Grain Loading (grains/dscf)] * [Air Flow Rate (dscfm)] * [60 min/hr] * [lb/7000 grains]
Controlled/Captured Emissions (tons/yr) = [Controlled/Captured Emissions (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]
Uncontrolled/Captured Emissions (lbs/hr) = [Controlled/Captured Emissions (lbs/hr)] / [(1 - Control Efficiency)]
Uncontrolled/Captured Emissions (tons/yr) = [Uncontrolled/Captured Emissions (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]
Uncaptured Emissions (lbs/hr) = [Uncontrolled/Captured Emissions (lbs/hr)/(Capture Efficiency)] * [(1 - Capture Efficiency)]
Uncaptured Emissions (tons/yr) = [Uncaptured Emissions (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]

**Methodology** for Baghouses BH13 and BH14

Uncontrolled Emissions (lbs/hr) = [Throughput (lbs/hr)]
Uncontrolled Emissions (tons/yr) = [Uncontrolled Emissions (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]
Controlled Emissions (lbs/hr) = [Uncontrolled Emissions (lbs/hr)] * [1 - Control Efficiency]
Controlled Emissions (tons/yr) = [Controlled Emissions (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]

**Appendix A: Emission Calculations**
**Particulate Control Devices**

**Company Name:** PacMoore Process Technologies
**Source Address:** 100 PacMoore Pkwy, Mooresville, Indiana 46158
**Permit No:** F109-33209-00062
**Reviewer:** Deena Patton

| Baghouses | Air Flow Rate (dscfm) | Outlet Grain Loating (gr/dscf) | Control Efficiency (%)* | $PM/PM_{10}/PM_{2.5}$ Controlled Emissions | | $PM/PM_{10}/PM_{2.5}$ Uncontrolled Emissions | | $PM/PM_{10}/PM_{2.5}$ Limit | |
|---|---|---|---|---|---|---|---|---|---|
| | | | | (lbs/hr) | (tons/yr) | (lbs/hr) | (tons/yr) | (lbs/hr) | (tons/yr) |
| Small Receiving Bin (BH15) | 244 | 0.02 | 98.00% | 0.042 | 0.18 | 2.09 | 9.16 | 0.042 | 0.18 |
| Large Receiving Bin (BH16) | 5,500 | 0.02 | 98.00% | 0.943 | 4.13 | 47.14 | 206.49 | 0.943 | 4.13 |
| **Total** | | | | | **4.31** | | **215.65** | | **4.31** |

| | |
|---|---|
| **Potential to Emit Before Control (tons/yr):** | **215.65** |
| **Potential to Emit After Control (tons/yr):** | **4.31** |
| **Limited Potential to Emit (tons/yr):** | **4.31** |

**Methodology**
*These units have a 100% capture efficiency.
Controlled Emissions (lbs/hr) = [Outlet Grain Loading (grains/dscf)] * [Air Flow Rate (dscfm)] * [60 min/hr] * [lb/7000 grains]
Controlled Emissions (tons/yr) = [Controlled Emissions (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]
Uncontrolled Emissions (lbs/hr) = [Controlled Emissions (lbs/hr)] / [(1 - Control Efficiency)]
Uncontrolled Emissions (tons/yr) = [Uncontrolled Emissions (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]

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

**Company Name:** PacMoore Process Technologies
**Source Address:** 100 PacMoore Pkwy, Mooresville, Indiana 46158
**Permit No:** F109-33209-00062
**Reviewer:** Deena Patton

**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) |
|---|---|---|---|---|---|---|---|---|---|
| Trucks Load/Unload | | | | | | | | | |
| Vehicle (entering plant) (one-way trip) | 20.0 | 2.0 | 40.0 | 30.0 | 1200.0 | 1162 | 0.220 | 8.80 | 3212.0 |
| Vehicle (leaving plant) (one-way trip) | 20.0 | 2.0 | 40.0 | 30.0 | 1200.0 | 1162 | 0.220 | 8.80 | 3212.0 |
| Entrance | | | | | | | | | |
| Vehicle (entering plant) (one-way trip) | 140.0 | 3.0 | 420.0 | 4.15 | 1743.0 | 106 | 0.020 | 10.39 | 3792.4 |
| Vehicle (leaving plant) (one-way trip) | 140.0 | 3.0 | 420.0 | 4.15 | 1743.0 | 106 | 0.020 | 10.39 | 3792.4 |
| Parking Lot | | | | | | | | | |
| Vehicle (entering plant) (one-way trip) | 120.0 | 4.0 | 480.0 | 2.0 | 960.0 | 264 | 0.050 | 24.0 | 8760.0 |
| Vehicle (leaving plant) (one-way trip) | 120.0 | 4.0 | 480.0 | 2.0 | 960.0 | 264 | 0.050 | 24.0 | 8760.0 |
| | | **Total** | **1880.0** | | **7806.0** | | | **86.4** | **31528.7** |

Average Vehicle Weight Per Trip = 4.2 tons/trip
Average Miles Per Trip = 0.05 miles/trip

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

| | PM | PM10 | PM2.5 | |
|---|---|---|---|---|
| where k = | 0.011 | 0.0022 | 0.00054 | lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1) |
| W = | 4.2 | 4.2 | 4.2 | tons = average vehicle weight (provided by source) |
| sL = | 0.6 | 0.6 | 0.6 | g/m^2 = silt loading value for paved roads - Table 13.2.1-3) |

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 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, Ef = | 0.030 | 0.006 | 0.0014 | lb/mile |
| Mitigated Emission Factor, Eext = | 0.027 | 0.005 | 0.0013 | lb/mile |

| Process | Unmitigated PTE of PM (tons/yr) | Unmitigated PTE of PM10 (tons/yr) | Unmitigated PTE of PM2.5 (tons/yr) | Mitigated PTE of PM (tons/yr) | Mitigated PTE of PM10 (tons/yr) | Mitigated PTE of PM2.5 (tons/yr) |
|---|---|---|---|---|---|---|
| Trucks Load/Unload | | | | | | |
| Vehicle (entering plant) (one-way trip) | 0.05 | 0.009 | 0.002 | 0.04 | 0.009 | 0.002 |
| Vehicle (leaving plant) (one-way trip) | 0.05 | 0.009 | 0.002 | 0.04 | 0.009 | 0.002 |
| Entrance | | | | | | |
| Vehicle (entering plant) (one-way trip) | 0.06 | 0.011 | 0.003 | 0.05 | 0.010 | 0.003 |
| Vehicle (leaving plant) (one-way trip) | 0.06 | 0.011 | 0.003 | 0.05 | 0.010 | 0.003 |
| Parking Lot | | | | | | |
| Vehicle (entering plant) (one-way trip) | 0.13 | 0.026 | 0.006 | 0.12 | 0.024 | 0.006 |
| Vehicle (leaving plant) (one-way trip) | 0.13 | 0.026 | 0.006 | 0.12 | 0.024 | 0.006 |
| | **0.47** | **0.09** | **0.02** | **0.43** | **0.09** | **0.02** |

**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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**
*We Protect Hoosiers and Our Environment.*
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

**Michael R. Pence**
*Governor*

**Thomas W. Easterly**
*Commissioner*

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

TO: Scott Evans
PacMoore Process Technologies
100 PacMoore Parkway
Mooresville, IN 46158

DATE: July 25, 2013

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

SUBJECT: Final Decision
First Significant Revision to FESOP
109-33209-00062

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:
Adam Rawlins, Responsible Official
David Dempsey, Trinity Consultants
Brooke A. Myer, Trinity Consultants
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

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**Michael R. Pence**
*Governor*

**Thomas W. Easterly**
*Commissioner*

July 25, 2013

To: Mooresville Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

**Applicant Name: PacMoore Process Technologies**
**Permit Number: 109-33209-00062**

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 6/13/2013

# Mail Code 61-53

| IDEM Staff | PWAY 7/25/2013<br>PacMoore Process Technologies 109-33209-00062 (final) | | | AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING |
|---|---|---|---|---|
| Name and address of Sender | ▶ | Indiana Department of Environmental Management<br>Office of Air Quality – Permits Branch<br>100 N. Senate<br>Indianapolis, IN 46204 | Type of Mail:<br>**CERTIFICATE OF MAILING ONLY** | |

| Line | Article Number | Name, Address, Street and Post Office Address | Postage | Handing Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee<br>Remarks |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | | Scott Evans PacMoore Process Technologies 100 PacMoore Pkwy Mooresville 46158 (Source CAATS) | | | | | | | | | |
| 2 | | Adam Rawlins Plant Mgr PacMoore Process Technologies 100 PacMoore Pkwy Mooresville 46158 *(RO CAATS)* | | | | | | | | | |
| 3 | | Morgan County Commissioners 180 South Main Street Martinsville IN 46151 *(Local Official)* | | | | | | | | | |
| 4 | | Mooresville Town Council 4 E Harrison Street Mooresville IN 46158 *(Local Official)* | | | | | | | | | |
| 5 | | Mooresville Public Library 220 W Harrison St Mooresville IN 46158-1633 *(Library)* | | | | | | | | | |
| 6 | | Clayton D. & Patricia A. Arthur 5178 Brenda Boulvard Greenwood IN 46143 *(Affected Party)* | | | | | | | | | |
| 7 | | Morgan County Health Department 180 S Main Street, Suite 252 Martinsville IN 46151-1988 *(Health Department)* | | | | | | | | | |
| 8 | | T. K. Forslund 8147 E. Old St. Rd. 144 Mooresville IN 46158 *(Affected Party)* | | | | | | | | | |
| 9 | | David Jones 7977 N. Taylors Rd. Mooresville IN 46158 *(Affected Party)* | | | | | | | | | |
| 10 | | Claudia Parker 6761 Centenary Rd. Mooresville IN 46158 *(Affected Party)* | | | | | | | | | |
| 11 | | James Swails 6568 E. Rosebud Lane Mooresville IN 46158 *(Affected Party)* | | | | | | | | | |
| 12 | | John Thurston 6548 E. Watson Mooresville IN 46158 *(Affected Party)* | | | | | | | | | |
| 13 | | Mr. David Dempsey Trinity Consultants 7330 Woodland Drive, Suite 225 Indianapolis IN 46278 (Consultant) | | | | | | | | | |
| 14 | | Brooke A. Myer Trinity Consultants 7330 Woodland Drive, Suite 225 Indianapolis IN 46278 *(Consultant)* | | | | | | | | | |
| 15 | | | | | | | | | | | |

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