



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: September 25, 2014

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

Source Name: Whitewater Mill, LLC

Permit Level: FESOP

Permit Number: 029-34057-00045

Source Location: 707 Harrison Brookville Road, West Harrison, Indiana

Type of Action Taken: Initial Permit

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 matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 34057.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

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.

(continues on next page)

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.



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

**Whitewater Mill, LLC
707 Harrison Brookville Road
West Harrison, Indiana 47060**

(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.

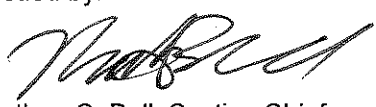
Operation Permit No. F029-34057-00045	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 25, 2014 Expiration Date: September 25, 2019

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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 wheat mill.

Source Address:	707 Harrison Brookville Road, West Harrison, Indiana 47060
General Source Phone Number:	217.857.2238
SIC Code:	SIC 2041 (Flour and Other Grain Mill Products)
County Location:	Dearborn Outside Lawrenceburg Township
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Whole Grain Receiving, Handling, Pre-Cleaning, and Storage Operations, identified as emission unit AUMF-60787, approved in 2014 for construction, having a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year, and consisting of the following:
 - (1) Whole Grain Receiving, with a maximum throughput capacity of 550 tons of raw wheat per hour, controlling particulate emissions with one (1) baghouse, identified as Filter #01, exhausting to stack S1, and including:
 - (A) One (1) partially enclosed truck unloading area; and
 - (i) Intake hopper(s); and
 - (ii) Enclosed conveyors;
 - (B) One (1) partially enclosed railcar unloading area.
 - (i) Intake hopper(s); and
 - (ii) Enclosed conveyors;
 - (2) Grain Handling, Pre-Cleaning, and Storage, with a maximum throughput capacity of 490 tons of raw wheat per hour, and including:
 - (A) Fourteen (14) enclosed conveyors, controlling particulate emissions with two (2) baghouses, identified as Filter #02 and Filter #03, exhausting to stacks S2 and S3;

- (B) Four (4) enclosed bucket elevators;
 - (C) Enclosed headhouse distribution system;
 - (D) Two (2) intake pre-cleaning machine(s); and
 - (E) Fourteen (14) storage bins, with a total [combined] maximum storage capacity of 960,000 bushels, uncontrolled and exhausting outside the building;
- (b) Cleaning House, identified as emission unit AUMF-60770, approved in 2014 for construction, with a maximum capacity of 30 tons of raw wheat per hour and a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year, and including:
- (1) Four (4) raw wheat bins, with a total storage capacity of 400 tons;
 - (2) Three (3) enclosed bucket elevators;
 - (3) Seven (7) enclosed conveyors;
 - (4) Grain cleaning operation, controlling particulate emissions with one (1) baghouse, identified as Filter #5, exhausting to Stack S5, and including:
 - (A) Separator(s);
 - (B) Aspirator(s);
 - (C) Magnetic Separator(s);
 - (D) Disc separator(s);
 - (E) Washer-Stoner(s);
 - (F) Scourer(s);
 - (G) Surge Bin;
 - (5) Tempering Bin(s);
 - (6) Enclosed pneumatic conveying, controlling particulate emissions with one (1) baghouse, identified as Filter #6, and exhausting to Stack S6; and
 - (7) Three (3) cleaned wheat bins, with a total storage capacity of 300 tons, including:
 - (A) One (1) light wheat bin, with a total storage capacity of 100 tons, controlling particulate emissions with one (1) baghouse, identified as Filter #17, and exhausting inside the building;
 - (B) One (1) un-ground screenings bin, with a total storage capacity of 100 tons, controlling particulate emissions with one (1) baghouse, identified as Filter #18, and exhausting inside the building; and

- (C) One (1) ground screenings bin, with a total storage capacity of 100 tons, controlling particulate emissions with one (1) baghouse, identified as Filter #19, and exhausting inside the building.
- (c) Mill House, identified as emission unit AUMF-60769, approved in 2014 for construction, with a maximum capacity of 25 tons of raw wheat per hour, including:
 - (1) Four (4) enclosed bucket elevators;
 - (2) Enclosed conveyors;
 - (3) Enclosed pneumatic conveying;
 - (4) Impact Machine(s);
 - (5) Stock hopper(s);
 - (6) Break roll(s);
 - (7) Hammer mill(s).
 - (8) Pin mill(s);
 - (9) Bran finisher(s);
 - (10) Plan sifter(s), controlling particulate emissions with two (2) baghouses, identified as Filter #07 and Filter #08, and exhausting to stacks S7 and S8;
 - (11) Purifier(s), controlling particulate emissions with one (1) baghouse, identified as Filter #09, and exhausting to stack S9; and
 - (12) High efficiency cyclone collectors.
- (d) Finished Product, Byproduct, & Mill Feed Handling, Storage, Loadout, and Shipping, approved in 2014 for construction, with a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year:
 - (1) Finished Product Handling & Storage, identified as emission unit AUMF-60629, including:
 - (A) Enclosed pneumatic conveying;
 - (B) Enclosed headhouse distribution system, identified as Total Receiver - High Ash Flour Line,
 - (C) Eight (8) airlock hoppers;
 - (D) One (1) micro ingredients system;
 - (E) One (1) flour blending system, including:
 - (i) Enclosed headhouse distribution system;
 - (ii) Five (5) blender/mixer/agitators;
 - (iii) One (1) totally enclosed chlorine gas flour bleaching system:

- (AA) Fourteen (14), 114 gallon, pressurized chlorine storage tanks, one (1) ton, each, for a total maximum storage capacity of 1,596 gallons or fourteen (14) tons;
 - (BB) Chlorine gas lines;
 - (iv) Enclosed pneumatic conveying;
 - (F) One (1) 10 ton intermediate storage bin, identified as Start-up Bin, controlling particulate emissions with one (1) baghouse, identified as #20;
 - (G) Twelve (12) finished product storage bins (one of the bins is divided into two), with a total [combined] storage capacity of 1,440 tons of flour, controlling particulate emissions with twelve (12) baghouses, identified as #21, #22, #23, #24, #25, #26, #27, #28, #28, #29, #30, #31, and exhausting inside the building.
- (2) Bulk Plant and Finished Product Loadout, identified as emission unit AUMF-60775, and including:
- (A) Enclosed pneumatic conveying;
 - (B) Enclosed headhouse distribution system, identified as Total Receiver, controlling particulate emissions with one (1) baghouse, identified as Filter #10, and exhausting to Stack S10;
 - (D) Four (4) storage bins for bulk flour load out, with a total storage capacity 810 tons, controlling particulate emissions with four (4) baghouses, identified as Filter #39, Filter #40, Filter #41, and Filter #42, and exhausting inside the building;
 - (G) One (1) storage bin for rail load out, with a total storage capacity 100 tons; and
 - (H) The bulk plant bagging operation and enclosed loadout area for bulk shipment via trucks and railcars, including:
 - (i) Enclosed pneumatic conveying, controlling particulate emissions with two (2) baghouses, identified as Filter #34 and Filter #35, exhausting inside the building;
 - (ii) Two (2) storage bins for packing flour, with a total storage capacity of 20 tons, controlling particulate emissions with two (2) baghouses, identified as Filter #36 and Filter #37, and exhausting inside the building;
 - (iii) One (1) storage bin packing food grade bran, with a total storage capacity 6 tons;
 - (iv) Sifters, controlling particulate emissions with two (2) baghouses, identified as Filter #32 and Filter #33, and exhausting inside the building;
 - (v) Scales;

- (vi) Sewing machine(s);
 - (vii) Bagging station(s);
 - (viii) Belt conveyors;
 - (ix) Metal detector(s);
 - (x) Label printer(s); and
 - (xi) Pallet wrapping station(s).
- (3) Byproducts and Mill Feed Storage, Handling, and Loadout, identified as emission unit AUMF-60778, and including:
- (A) Byproducts and Mill Feed Storage, and Handling, controlling particulate emissions with one (1) baghouse, identified as Filter #12, exhausting to stack S12, and including:
 - (i) One (1) enclosed bucket elevator;
 - (ii) Four (4) conveyors;
 - (iii) Enclosed pneumatic conveying;
 - (iv) One (1) storage bin for food grade bran, with a total storage capacity of 60 tons;
 - (v) Three (3) storage bins for Mill Feed, with a total storage capacity of 180 tons and
 - (vi) Two (2) storage bins for screenings, with a total storage capacity of 38 tons; and
 - (B) One (1) storage bin for Red Dog, with a total storage capacity of 60 tons, controlling particulate emissions with one (1) baghouse, identified as Filter #43, and exhausting inside the building;
 - (C) Enclosed loadout area for bulk shipment via trucks and railcars, controlling particulate emissions with four (4) baghouses, identified as Filter #13, Filter #14, Filter #15, and Filter #16, and exhausting to stacks S13, S14, S15, and S16, and including:
 - (i) One (1) enclosed bucket elevator.
 - (ii) One (1) storage bin for food grade bran, with a total storage capacity of 60 tons;
 - (iii) Two (2) conveyors;
 - (iv) Enclosed pneumatic conveying; and
 - (v) Bagging operations;
 - (AA) Sewing machine(s);

(BB) Bagging station(s); and

(CC) Weighing scale(s).

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) Paved roads with limited public access [326 IAC 6-4, 326 IAC 6.5]
- (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (c) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (d) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (e) Cleaners and solvents characterized as follows:
 - (A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 °C (100 °F) or;
 - (B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 °C (68 °F); the use of which for all cleaners and solvents combined does not exceed one hundred forty-five (145) gallons per twelve (12) months;
- (6) Portable containers used for the collection, storage, or disposal of materials provided the container capacity is equal to or less than forty-six hundredths (0.46) cubic meters (121.5 gallons) and the container is closed, except when the material is added or removed;
- (7) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment; and
- (8) Closed loop heating and cooling systems.

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, F029-34057-00045, 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
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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 or Southeast Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
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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 F029-34057-00045 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(42). 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
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- (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 CO₂ equivalent emissions (CO₂e) per twelve (12) consecutive month period.

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

C.7 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 demolitions 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)]

- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:
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 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, 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).

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. The analog instrument shall be capable of measuring values outside of the normal range.
- (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 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

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

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

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

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 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.15 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.16 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.17 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 operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.18 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.19 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 [326 IAC 2-8-4(10)]: Wheat Mill

- (a) Whole Grain Receiving, Handling, Pre-Cleaning, and Storage Operations, identified as emission unit AUMF-60787, approved in 2014 for construction, having a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year, and consisting of the following:
 - (1) Whole Grain Receiving, with a maximum throughput capacity of 550 tons of raw wheat per hour, controlling particulate emissions with one (1) baghouse, identified as Filter #01, exhausting to stack S1, and including:
 - (A) One (1) partially enclosed truck unloading area; and
 - (i) Intake hopper(s); and
 - (ii) Enclosed conveyors;
 - (B) One (1) partially enclosed railcar unloading area.
 - (i) Intake hopper(s); and
 - (ii) Enclosed conveyors;
 - (2) Grain Handling, Pre-Cleaning, and Storage, with a maximum throughput capacity of 490 tons of raw wheat per hour, and including:
 - (A) Fourteen (14) enclosed conveyors, controlling particulate emissions with two (2) baghouses, identified as Filter #02 and Filter #03, exhausting to stacks S2 and S3;
 - (B) Four (4) enclosed bucket elevators;
 - (C) Enclosed headhouse distribution system;
 - (D) Two (2) intake pre-cleaning machine(s);
 - (E) Fourteen (14) storage bins, with a total [combined] maximum storage capacity of 960,000 bushels, uncontrolled and exhausting outside the building;
- (b) Cleaning House, identified as emission unit AUMF-60770, approved in 2014 for construction, with a maximum capacity of 30 tons of raw wheat per hour and a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year, and including:
 - (1) Four (4) raw wheat bins, with a total storage capacity of 400 tons;
 - (2) Three (3) enclosed bucket elevators;
 - (3) Seven (7) enclosed conveyors;
 - (4) Grain cleaning operation, controlling particulate emissions with one (1) baghouse, identified as Filter #5, exhausting to Stack S5, and including:
 - (A) Separator(s);

- (B) Aspirator(s);
- (C) Magnetic Separator(s);
- (D) Disc separator(s);
- (E) Washer-Stoner(s);
- (F) Scourer(s);
- (G) Surge Bin;
- (5) Tempering Bin(s);
- (6) Enclosed pneumatic conveying, controlling particulate emissions with one (1) baghouse, identified as Filter #6, and exhausting to Stack S6; and
- (7) Three (3) cleaned wheat bins, with a total storage capacity of 300 tons, including;
 - (A) One (1) light wheat bin, with a total storage capacity of 100 tons, controlling particulate emissions with one (1) baghouse, identified as Filter #17, and exhausting inside the building;
 - (B) One (1) un-ground screenings bin, with a total storage capacity of 100 tons, controlling particulate emissions with one (1) baghouse, identified as Filter #18, and exhausting inside the building; and
 - (C) One (1) ground screenings bin, with a total storage capacity of 100 tons, controlling particulate emissions with one (1) baghouse, identified as Filter #19, and exhausting inside the building.
- (c) Mill House, identified as emission unit AUMF-60769, approved in 2014 for construction, with a maximum capacity of 25 tons of raw wheat per hour, including:
 - (1) Four (4) enclosed bucket elevators;
 - (2) Enclosed conveyors;
 - (3) Enclosed pneumatic conveying;
 - (4) Impact Machine(s);
 - (5) Stock hopper(s);
 - (6) Break roll(s);
 - (7) Hammer mill(s).
 - (8) Pin mill(s);
 - (9) Bran finisher(s);
 - (10) Plan sifter(s), controlling particulate emissions with two (2) baghouses, identified as Filter #07 and Filter #08, and exhausting to stacks S7 and S8;

- (11) Purifier(s), controlling particulate emissions with one (1) baghouse, identified as Filter #09, and exhausting to stack S9; and
 - (12) High efficiency cyclone collectors.
- (d) Finished Product, Byproduct, & Mill Feed Handling, Storage, Loadout, and Shipping, approved in 2014 for construction, with a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year:
- (1) Finished Product Handling & Storage, identified as emission unit AUMF-60629, including:
 - (A) Enclosed pneumatic conveying;
 - (B) Enclosed headhouse distribution system, identified as Total Receiver - High Ash Flour Line,
 - (C) Eight (8) airlock hoppers;
 - (D) One (1) micro ingredients system;
 - (E) One (1) flour blending system, including:
 - (i) Enclosed headhouse distribution system;
 - (ii) Five (5) blender/mixer/agitators;
 - (iii) One (1) totally enclosed chlorine gas flour bleaching system:
 - (AA) Fourteen (14), 114 gallon, pressurized chlorine storage tanks, one (1) ton, each, for a total maximum storage capacity of 1,596 gallons or fourteen (14) tons;
 - (BB) Chlorine gas lines;
 - (iv) Enclosed pneumatic conveying;
 - (F) One (1) 10 ton intermediate storage bin, identified as Start-up Bin, controlling particulate emissions with one (1) baghouse, identified as #20;
 - (G) Twelve (12) finished product storage bins (one of the bins is divided into two), with a total [combined] storage capacity of 1,440 tons of flour, controlling particulate emissions with twelve (12) baghouses, identified as #21, #22, #23, #24, #25, #26, #27, #28, #28, #29, #30, #31, and exhausting inside the building.
 - (2) Bulk Plant and Finished Product Loadout, identified as emission unit AUMF-60775, and including:
 - (A) Enclosed pneumatic conveying;
 - (B) Enclosed headhouse distribution system, identified as Total Receiver, controlling particulate emissions with one (1) baghouse, identified as Filter #10, and exhausting to Stack S10;
 - (D) Four (4) storage bins for bulk flour load out, with a total storage capacity 810 tons, controlling particulate emissions with four (4) baghouses, identified as Filter #39, Filter #40, Filter #41, and Filter #42, and exhausting inside the building;

- (G) One (1) storage bin for rail load out, with a total storage capacity 100 tons; and
- (H) The bulk plant bagging operation and enclosed loadout area for bulk shipment via trucks and railcars, including:
 - (i) Enclosed pneumatic conveying, controlling particulate emissions with two (2) baghouses, identified as Filter #34 and Filter #35, exhausting inside the building;
 - (ii) Two (2) storage bins for packing flour, with a total storage capacity of 20 tons, controlling particulate emissions with two (2) baghouses, identified as Filter #36 and Filter #37, and exhausting inside the building;
 - (iii) One (1) storage bin packing food grade bran, with a total storage capacity 6 tons;
 - (iv) Sifters, controlling particulate emissions with two (2) baghouses, identified as Filter #32 and Filter #33, and exhausting inside the building;
 - (v) Scales;
 - (vi) Sewing machine(s);
 - (vii) Bagging station(s);
 - (viii) Belt conveyors;
 - (ix) Metal detector(s);
 - (x) Label printer(s); and
 - (xi) Pallet wrapping station(s).
- (3) Byproducts and Mill Feed Storage, Handling, And Loadout, identified as emission unit AUMF-60778, and including:
 - (A) Byproducts and Mill Feed Storage, and Handling, controlling particulate emissions with one (1) baghouse, identified as Filter #12, exhausting to stack S12, and including:
 - (i) One (1) enclosed bucket elevator;
 - (ii) Four (4) conveyors;
 - (iii) Enclosed pneumatic conveying;
 - (iv) One (1) storage bin for food grade bran, with a total storage capacity of 60 tons;
 - (v) Three (3) storage bins for Mill Feed, with a total storage capacity of 180 tons and
 - (vi) Two (2) storage bins for screenings, with a total storage capacity of 38 tons; and

- (B) One (1) storage bin for Red Dog, with a total storage capacity of 60 tons, controlling particulate emissions with one (1) baghouse, identified as Filter #43, and exhausting inside the building;
- (C) Enclosed loadout area for bulk shipment via trucks and railcars, controlling particulate emissions with four (4) baghouses, identified as Filter #13, Filter #14, Filter #15, and Filter #16, and exhausting to stacks S13, S14, S15, and S16, and including:
 - (i) One (1) enclosed bucket elevator.
 - (ii) One (1) storage bin for food grade bran, with a total storage capacity of 60 tons;
 - (iii) Two (2) conveyors;
 - (iv) Enclosed pneumatic conveying; and
 - (v) Bagging operations;
 - (AA) Sewing machine(s);
 - (BB) Bagging station(s); and
 - (CC) Weighing scale(s).

Insignificant activities

- (a) Paved roads with limited public access [326 IAC 6-4, 326 IAC 6.5]

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

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

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

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, PM emissions (after control) from each of the following emission units shall not exceed the limits specified in the table below:

Emissions Unit Description (Unit ID)	Process	Baghouse or Filter #	PM Limitation (lbs/hr)
Whole Grain Receiving, Pre-cleaning, & Handling (AUMF-60787)	Wheat Intake	01	4.66
	Pre-Cleaning	02	3.95
	Silo Chain Conveyor	03	0.33
Cleaning House (AUMF-60770)	Cleaning	05	2.77
	Screenings	06	0.68
	Light Wheat Bin	17	0.05
	Unground Screenings Bin	18	0.25
	Ground Screenings Bin	19	0.05
Mill House (AUMF-60769)	Mill - Pneumatic	07	3.00
	Mill - Pneumatic	08	3.00
	Mill - Aspiration	09	2.48

Emissions Unit Description (Unit ID)	Process	Baghouse or Filter #	PM Limitation (lbs/hr)
Finished Product Handling (AUMF-60629)	Total Receiver High Ash Flour Line	20	0.05
	Start Up Bin	21	0.49
	Airlock Hopper Clear Flour	22	0.06
	Airlock Hopper Cake Flour	23	0.06
	Airlock Hopper Patent Flour	24	0.06
	Airlock Hopper Whole Wheat Flour	25	0.06
	Total Receiver High Ash Flour	26	0.03
	Airlock Hopper Flour To Packing	27	0.09
	Airlock Hopper Flour To Packing	28	0.09
	Whole Wheat Bin	29	0.37
	High Ash Bin	30	0.11
	Cake Flour Bin	31	0.37
Finished Product Loadout (AUMF-60775)	Total Receiver	10	0.48
	Flour Line Sifter To Load Out Bins	33	0.06
	Total Receiver Vacuum System	34	0.25
	Packer Aspiration Filter	35	0.18
	Patent Packing Bin	36	0.50
	Patent Packing Bin	37	0.50
	Outload Bin	39	0.50
	Outload Bin	40	0.50
	Outload Bin	41	0.50
Byproducts & Mill Feed Handling, Storage, & Loadout (AUMF 60778)	Bran Bins	12	0.93
	Mill Feed Outload Bin	13	0.30
	Mill Feed Outload Bin	14	0.30
	Mill Feed Outload Bin	15	0.30
	Mill Feed Outload Bin	16	0.30
	RED DOG Bin	43	0.16

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

D.1.2 FESOP Limits: PM10 and PM2.5, [326 IAC 2-8-4][326 IAC 2-2]

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, PM10 and PM2.5 emissions (after control) from each of the following emission units shall not exceed the limits specified in the table below:

Emissions Unit Description (Unit ID)	Process	Baghouse or Filter #	PM10 Limitation (lbs/hr)	PM2.5 Limitation (lbs/hr)
Whole Grain Receiving / Pre-cleaning / Handling (AUMF-60787)	Wheat Intake	01	2.89	2.89
	Pre-Cleaning	02	2.45	2.45
	Silo Chain Conveyor	03	0.20	0.20
Cleaning House (AUMF-60770)	Cleaning	05	1.72	1.72
	Screenings	06	0.42	0.42
	Light Wheat Bin	17	0.03	0.03
	Unground Screenings Bin	18	0.15	0.15
	Ground Screenings Bin	19	0.03	0.03

Emissions Unit Description (Unit ID)	Process	Baghouse or Filter #	PM10 Limitation (lbs/hr)	PM2.5 Limitation (lbs/hr)
Mill House (AUMF-60769)	Mill - Pneumatic	07	1.86	1.86
	Mill - Pneumatic	08	1.86	1.86
	Mill - Aspiration	09	1.54	1.54
Finished Product Handling (AUMF-60629)	Total Receiver High Ash Flour Line	20	0.03	0.03
	Start Up Bin	21	0.30	0.30
	Airlock Hopper Clear Flour	22	0.04	0.04
	Airlock Hopper Cake Flour	23	0.04	0.04
	Airlock Hopper Patent Flour	24	0.04	0.04
	Airlock Hopper Whole Wheat Flour	25	0.04	0.04
	Total Receiver High Ash Flour	26	0.02	0.02
	Airlock Hopper Flour To Packing	27	0.06	0.06
	Airlock Hopper Flour To Packing	28	0.06	0.06
	Whole Wheat Bin	29	0.23	0.23
	High Ash Bin	30	0.07	0.07
	Cake Flour Bin	31	0.23	0.23
Finished Product Loadout (AUMF-60775)	Total Receiver	10	0.30	0.30
	Flour Line Sifter To Load Out Bins	33	0.04	0.04
	Total Receiver Vacuum System	34	0.15	0.15
	Packer Aspiration Filter	35	0.11	0.11
	Patent Packing Bin	36	0.31	0.31
	Patent Packing Bin	37	0.31	0.31
	Outload Bin	39	0.31	0.31
	Outload Bin	40	0.31	0.31
	Outload Bin	41	0.31	0.31
Byproducts & Mill Feed Storage, Handling & Loadout (AUMF 60778)	Bran Bins	12	0.57	0.57
	Mill Feed Outload Bin	13	0.19	0.19
	Mill Feed Outload Bin	14	0.19	0.19
	Mill Feed Outload Bin	15	0.19	0.19
	Mill Feed Outload Bin	16	0.19	0.19
	RED DOG Bin	43	0.10	0.10

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

D.1.3 Particulate Emission Limits [326 IAC 6.5-1-2]

- (a) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from each of the emission units at this source shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)); and

- (b) Pursuant to 326 IAC 6.5-1-2(d)(2), the whole grain receiving, handling, pre-cleaning, and storage operations, collectively identified as emission unit AUMF-60787, shall comply with the following :
 - (1) Housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:
 - (A) Housekeeping practices shall be conducted as follows:
 - (i) Areas to be swept and maintained shall include, at a minimum, the following:
 - (AA) General grounds, yard, and other open areas.
 - (BB) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.
 - (CC) Grain driers with respect to accumulated particulate matter.
 - (ii) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
 - (iii) Dust from driveways, access roads, and other areas of travel shall be controlled.
 - (iv) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.
 - (B) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
 - (i) Malfunctions.
 - (ii) Breakdowns.
 - (iii) Improper adjustment.
 - (iv) Operating above the rated or designed capacity.
 - (v) Not following designed operating specifications.
 - (vi) Lack of good preventive maintenance care.
 - (vii) Lack of critical and proper spare replacement parts on hand.
 - (viii) Lack of properly trained and experienced personnel.
 - (C) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined under 326 IAC 5-1.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and any corresponding 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.1.5 Particulate Control

- (1) Each of the baghouses, identified as Filters #01, #02, and #03, controlling particulate emissions from the Receiving, Pre-Cleaning, & Handling (AUMF-60787), shall be in operation and control emissions from the wheat intake, pre-cleaning, and silo chain conveyor at all times when the wheat intake, pre-cleaning, and silo chain conveyor are in operation.
- (2) Each of the baghouses, identified as Filters #05, #06, #17, #18, and #19, controlling particulate emissions from the Cleaning House (AUMF-60770), shall be in operation and control emissions from the cleaning, screenings, light wheat bin, unground screenings bin, and ground screenings bin at all times when the cleaning, screenings, light wheat bin, unground screenings bin, and ground screenings bin are in operation.
- (3) Each of the baghouses, identified as Filters #07, #08, and #09, controlling particulate emissions from the Mill House (AUMF-60769), shall be in operation and control emissions from the Mill - pneumatic and Mill - aspiration at all times when the Mill - pneumatic and Mill - aspiration are in operation.
- (4) Each of the baghouses, identified as Filters #20, #21, #22, #23, #24, #25, #26, #27, #28, #29, #30, and #31, controlling particulate emissions from the Finished Product Handling (AUMF-60629), shall be in operation and control emissions from the total receiver high ash flour line, start up bin, airlock hopper clear flour, airlock hopper cake flour, airlock hopper patent flour, airlock hopper whole wheat flour, total receiver high ash flour, airlock hopper flour to packing, airlock hopper flour to packing, whole wheat bin, high ash bin, and cake flour bin at all times when the total receiver high ash flour line, start up bin, airlock hopper clear flour, airlock hopper cake flour, airlock hopper patent flour, airlock hopper whole wheat flour, total receiver high ash flour, airlock hopper flour to packing, airlock hopper flour to packing, whole wheat bin, high ash bin, and cake flour bin are in operation.
- (5) Each of the baghouses, identified as Filters #10, #33, #34, #35, #36, #37, #39, #40, and #41, controlling particulate emissions from the Finished Product Loadout (AUMF-60775), shall be in operation and control emissions from the total receiver, flour line sifter to load out bins, total receiver vacuum system, packer aspiration filter, patent packing bin, patent packing bin, outload bin, outload bin, outload bin at all times when the total receiver, flour line sifter to load out bins, total receiver vacuum system, packer aspiration filter, patent packing bin, patent packing bin, outload bin, outload bin, outload bin are in operation.
- (6) Each of the baghouses, identified as Filters #12, #13, #14, #15, #16, and #43, controlling particulate emissions from the Byproducts & Mill Feed, Handling, Storage, & Loadout, (AUMF 60778), shall be in operation and control emissions from the bran bins, mill feed outload, mill feed outload, mill feed outload, mill feed outload, red dog bin at all times when the bran bins, mill feed outload, mill feed outload, mill feed outload, mill feed outload, red dog bin are in operation.

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM, PM10, and PM2.5 emissions stack testing not later than 180 days after startup, utilizing methods approved by the Commissioner, for the following control devices:

Emission Unit	Process	Control ID / Stack ID
Receiving, Pre-cleaning, & Handling (AUMF-60787)	Wheat Intake	Filter #01 / S1
	Pre-cleaning	Filter #02 / S2
	Silo chain conveyor	Filter #03 / S3
Cleaning House (AUMF-60770)	Cleaning	Filter #05 / S5
	Screenings	Filter #06 / S6
Mill House (AUMF-60769)	Mill - pneumatic	Filter #07 / S7
	Mill - pneumatic	Filter #08 / S8
	Mill - aspiration	Filter #09 / S9
Finished Product Handling (AUMF-60629)	Start Up Bin	Filter #21 / vents inside
	Whole Wheat Bin	Filter #29 / vents inside
	Cake Flour Bin	Filter #31 / vents inside
Finished Product Storage (AUMF-60775)	Total Receiver	Filter #10 / S10
	Patent packing bin	Filter #36 / vents inside
	Patent packing bin	Filter #37 / vents inside
	Outload Bin	Filter #39 / vents inside
	Outload Bin	Filter #40 / vents inside
	Outload Bin	Filter #41 / vents inside
Byproducts & Mill Feed Handling, & Storage, (AUMF 60778)	Bran Bins	Filter #12 / S12
	Mill Feed Outload Bin	Filter #13 / S13
	Mill Feed Outload Bin	Filter #14 / S14
	Mill Feed Outload Bin	Filter #15 / S15
	Mill Feed Outload Bin	Filter #16 / S16

These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable particulate matter.

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

D.1.7 Visible Emissions Notations

- (a) Visible emission notations from the Receiving, Pre-cleaning, & Handling (AUMF-60787), conveyors, screens, material transfer points, Wheat Intake stack (S1) exhaust, Pre-cleaning stack (S2) exhaust, and Silo chain conveyor stack (S3) exhaust, each, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations from the Cleaning House (AUMF-60770), Cleaning stack (S5) exhaust, and Screenings stack (S6) exhaust, each, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

- (c) Visible emission notations from the Mill House (AUMF-60769), Mill - pneumatic stacks (S7 and S8) exhausts, and Mill - aspiration stack (S9) exhaust, each, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (d) Visible emission notations from the Finished Product Loadout (AUMF-60775), Total Receiver stack (S10) exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (e) Visible emission notations from the Byproducts & Mill Feed Handling, Storage, & Loadout (AUMF 60778) conveyors, screens, material transfer points, Bran Bins stack (S12) exhaust, and Mill Feed Outload stacks (S13, S14, S15, and S16) exhausts, each, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (f) 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.
- (g) 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.
- (h) 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.
- (i) 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. An abnormal visible emission notation is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.1.8 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the Finished Product Handling (AUMF-60629) Start-up Bin baghouse, identified as Filter #21, Whole Wheat Bin baghouse, identified as Filter #29, and Cake Flour Bin baghouse, identified as Filter #31, each, at least once per day when the corresponding emission unit is in operation. When, for any one reading, the pressure drop across a baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for each baghouse is a pressure drop between three (3.0) and five (5.0) inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test.
- (b) The Permittee shall record the pressure drop across the Finished Product Loadout (AUMF-60775) Total Receiver baghouse, identified as Filter #10, two (2) Patent Packing Bins baghouses, identified as Filters #36 and # 37, and three (3) Outload Bins baghouses, identified as Filters #39, #40, and #41, each, at least once per day when the corresponding emission unit is in operation. When, for any one reading, the pressure drop across a baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for each baghouse is a pressure drop between three (3.0) and five (5.0) 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 or 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(s) is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument(s) 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.1.9 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, or dust traces.

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

D.1.10 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.7(a), D.1.7(b), D.1.7(c), D.1.7(d), D.1.7(e), the Permittee shall maintain records once per day of the visible emission notations. The Permittee shall include in each of its daily records when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) To document the compliance status with Conditions D.1.8(a) and D.1.8(b), the Permittee shall maintain records once per day of the pressure drop during normal operation. The Permittee shall include in each of its daily records 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 contains the Permittee's obligations with regard to the records required by this condition.

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

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

Source Name: Whitewater Mill, LLC
Source Address: 707 Harrison Brookville Road, West Harrison, Indiana 47060
FESOP Permit No.: F029-34057-00045

**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: Whitewater Mill, LLC
Source Address: 707 Harrison Brookville Road, West Harrison, Indiana 47060
FESOP Permit No.: F029-34057-00045

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Source Name: Whitewater Mill, LLC
Source Address: 707 Harrison Brookville Road, West Harrison, Indiana 47060
FESOP Permit No.: F029-34057-00045

Months: _____ to _____ Year: _____

Page 1 of 2

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

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Whitewater Mill, LLC
707 Harrison Brookville Road
West Harrison, Indiana 47060

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 Whitewater Mill, LLC, 707 Harrison Brookville Road, West Harrison, Indiana 47060, completed construction of the wheat mill on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on January 09, 2014 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F029-34057-00045, Plant ID No. 029-00045 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

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

Signature _____
Name _____ (typed or printed)

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

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

Source Background and Description
--

Source Name:	Whitewater Mill LLC
Source Location:	707 Harrison Brookville Road, West Harrison, Indiana 47060
County:	Dearborn
SIC Code:	2041 (Flour and Other Grain Mill Products)
Operation Permit No.:	F029-34057-00045
Permit Reviewer:	Hannah L. Desrosiers

On August 12, 2014, the Office of Air Quality (OAQ) had a notice published in Journal Press, Lawrenceburg, Indiana, stating that Whitewater Mill LLC had applied for a new source construction and FESOP to construct and operate a new stationary wheat mill. The notice also stated that the OAQ proposed to issue a new source construction and FESOP for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

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

On August 15, 2014, Mr. Jon Seymour, President of Oxbow, Inc., submitted comments to IDEM, OAQ on the draft new source construction and FESOP, as follows:

Comment 1:

Flour mills are often notoriously dusty operations. After reviewing the proposed permit and the application itself, we understand that the applicant will be employing measures intended to capture 99.95% of the dust. However, because of the large volume of wheat to be processed at this site, even if a tiny fraction of the dust escapes into the air, the negative effect on water quality in the river could be significant. Flour which reaches the river water could create a paste-like substance that can affect the river ecosystem and even create a very unpleasant smell.

The permit should require the applicant to employ best available practices so as to minimize any harm to the river ecosystem to the detriment of downstream property owners, including Oxbow.

Response to Comment 1:

IDEM, OAQ recognizes that particulate matter emissions associated with the Whitewater Mill, a new wheat flour production facility, is of great personal concern to Oxbow, Inc. and other local residents. The dust concerns described above would be considered fugitive dust, which is particulate matter that crosses the property boundary of a plant at ground level.

Pursuant to IC 13-30-2-1(1) "A person may not discharge, emit, cause, allow, or threaten to discharge, emit, cause, or allow any contaminant or waste, including any noxious odor, either alone or in combination with contaminants from other sources, into the environment, in any form that causes or would cause pollution that violates or would violate rules, standards, or discharge or emission requirements adopted by the appropriate board under the environmental management laws."

The Air Pollution Control Board (APCB) is responsible for adopting rules regarding various air pollution matters. IDEM is following the air permit rules as set out in Title 326 of the Indiana Administrative Code, as passed by the APCB. As a result, this permit does not address odors because the APCB has not adopted or incorporated any state or federal rules, standards, or emission requirements for noxious odors into Title 326 of the Indiana Administrative Code.

IDEM, OAQ is required to issue air pollution control permits to sources that have indicated that they can comply with all applicable air pollution control requirements, whether or not the local government unit has made zoning or construction approvals. Therefore, particulate emissions (PM, PM10, PM2.5) and fugitive dust, all regulated air pollutants, are addressed in the permit. The permit contains the following conditions that specify emission limitations and standards, and associated compliance determination, compliance monitoring, and recordkeeping requirements that are related to particulate matter emissions and fugitive dust:

1. Condition C.1 of the permit regulates particulate emissions for processes with process weight rates less than one hundred (100) pounds per hour to less than or equal to 0.551 pounds per hour.
2. Condition C.2 of the permit limits the entire source's potential to emit criteria pollutants, under the authority of 326 IAC 2-8 (Federally Enforceable State Operating Permit (FESOP)), to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.
3. Condition C.3 of the permit regulates opacity, or the degree to which emissions reduce the transmission of light and obscure the view of an object in the background, by incorporating the requirements of 326 IAC 5-1.
4. Condition C.6 of the permit regulates fugitive dust emissions by incorporating the requirements of 326 IAC 6-4. According to this condition, 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.
5. Condition D.1.1 of the permit limits particulate matter (PM) from various processes (controlled by baghouses) at this source in order to limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable. Based on 8760 hours of operation, the limited source-wide PM emissions are 198.71 tons/yr.

Note: Under 326 IAC 1-2-52, particulate matter (PM) is defined as any airborne finely divided solid or liquid material, excluding uncombined water, with an aerodynamic diameter smaller than one hundred (100) micrometers (μm).

6. Condition D.1.2 of the permit limits PM10 and PM2.5 from various processes (controlled by baghouses) at this source in order to limit the source-wide total potential to emit PM10 and PM2.5 to less than 100 tons per 12 consecutive month period, each, to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable. Based on 8760 hours of operation, the limited source-wide PM10 emissions are 98.13 tons/yr and the limited source-wide PM2.5 emissions are 81.69 tons/yr.

Note: Under 326 IAC 1-2-52.2, PM10 means particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (μm).

Note: Under 326 IAC 1-2-52.4, PM2.5 means particulate matter with an aerodynamic diameter less than or equal to a nominal two and five-tenths (2.5) micrometers (μm),

7. Condition D.1.3 of the permit regulates particulate emissions by incorporating the requirements of 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), which limits particulate matter emissions to less than or equal to three-hundredths (0.03) grains per dry standard cubic foot (dscf), and requires specific housekeeping and maintenance procedures designed to minimize the opportunity for particulate matter to become airborne and leave the property. Buhler Inc., the company that manufactures the baghouses for this source, certifies the baghouses are designed to operate consistently at forty-four ten-thousandths (0.0044) grains per dry standard cubic foot (dscf);
8. Condition D.1.4 of the permit requires a preventive maintenance plan for the each of the mill's process units and any corresponding control devices.
9. Condition D.1.7 of the permit requires that a trained employee at the plant perform visible emission notations of each of the externally venting baghouses serving the Receiving, Pre-cleaning, & Handling, the Cleaning House, the Mill House, the Finished Product Loadout and the Byproducts & Mill Feed Handling, Storage, & Loadout once per day during normal daylight operations. If abnormal emissions are observed, the Permittee is required to take reasonable response steps to restore operation of the emissions unit (including any control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
10. Condition D.1.8 of the permit requires that the internally exhausting baghouses serving the Finished Product Handling (AUMF-60629), Start-up Bin baghouse, identified as Filter #21, Whole Wheat Bin baghouse, identified as Filter #29, and Cake Flour Bin baghouse, identified as Filter #31, and Finished Product Loadout (AUMF-60775), Total Receiver baghouse, identified as Filter #10, two (2) Patent Packing Bins baghouses, identified as Filters #36 and # 37, and three (3) Outload Bins baghouses, identified as Filters #39, #40, and #41, each, be monitored at least once a day when the corresponding emission unit is in operation to ensure that the pressure drop across each baghouse is within the normal range for the baghouse. If the reading is not within the normal range then Whitewater Mill is required to respond in accordance with Condition C.15: Response to Excursions or Exceedances (page 37 of 44 of the permit). Failure to respond constitutes a deviation from the permit.
11. Condition D.1.9 of the permit requires processes controlled by single compartment baghouse be shut down if a bag breaks or the baghouse malfunctions;

All of Whitewater Mill LLC's (Whitewater Mill) grain handling and processing systems will be equipped with dust control systems (i.e., baghouses). Dust extracted from a process by aspiration (negative pressure, suction) is ducted to a baghouse. As indicated by Whitewater Mill LLC's process design, any process air that is vented to atmosphere has passed through these baghouses.

The dust that is separated from the process air by the baghouse filters is either returned to the associated process, or stored for disposal, and not released. The pre-cleaning, cleaning and milling processes take place within a sealed building. All areas are designed to be dust free (machines are operated under negative pressure). All entrance and exit drives will be paved. Furthermore, Whitewater Mill has installed silt fences to control erosion, and the milling process will not produce any water emissions, because it is a dry process.

IDEM, OAQ will inspect the plant to determine if the Whitewater Mill is adequately controlling particulate (PM, PM10, PM2.5) and fugitive dust emissions and to verify compliance with the permit and State and Federal air pollution regulations. IDEM, OAQ believes that compliance with the permit requirements summarized above will ensure that the particulate and fugitive dust emissions from all areas of the plant will be controlled to a level that complies with State and Federal air pollution regulations.

The observed presence of odors and or emissions of dust might be indicators that the source is out of compliance with one or more of the permit conditions summarized above. IDEM, OAQ encourages residents to contact an IDEM, OAQ Compliance Inspector when they witness abnormal emissions at the source, particulate matter that crosses the property boundary of the plant at

ground level, or any other compliance related concerns with this facility. Violations observed by an IDEM Compliance Inspector would be evaluated by IDEM's Compliance and Enforcement Branch, and the appropriate action would be initiated to ensure compliance with applicable permit conditions and State and Federal air pollution regulations.

To file a complaint related to air pollution, please contact the current IDEM OAQ Compliance Inspector, Larry Howard, by telephone at (317) 233-6869 or toll free (800) 451-6027 (extension 3-6869). In addition, IDEM's Complaint Clearinghouse provides more information regarding filing complaints and is available at IDEM's website at <http://www.in.gov/idem/5274.htm>. IDEM, OAQ's Compliance Inspector will respond to any citizen complaints of visible emissions, fugitive dust, or other air pollution concern at the facility by doing a complaint inspection. In every inspection, whether the result of a complaint or not, the IDEM OAQ compliance inspector will monitor the facility to determine if it is complying with the permit. The inspector prepares a written report of each inspection. Copies of inspection reports can be obtained from the IDEM Virtual File Cabinet (VFC) Public Portal Search page at <http://108.59.49.89/Pages/Public/Search.aspx>.

To file a complaint related to land and/or water pollution, such as observed releases/spills, please contact the Emergency Response Spill Hotline, Open 24 hours a day, 7 days a week, toll free: 888-233-7745 (888-233-SPIL), whenever a spill to soil and/or water is witnessed. For more information regarding what constitutes a spill, please see the IDEM Emergency Response website at <http://www.in.gov/idem/4155.htm>

Contact has been made with the Office of Water Quality (OWQ) in an effort to provide comprehensive information on the proposed facility. At this time, applications have not been received by the OWQ. The OWQ has indicated that any required permits will be determined based on the application and proposed activities that will occur at the Whitewater Mill. Individual permits may apply to this facility as there are proposed discharges associated with process water, and a storm water permit may be applicable, provided industrial operations, as identified in 327 IAC 15-6, are exposed to storm water. For information related to OWQ permitting, please contact the Office of Water Quality (OWQ), at (800) 451-6027.

No changes were made as a result of this comment.

Comment 2:

The raw grain needed to produce flour and other end products could be unloaded in only a few days of operation, concentrating unloading dust emissions and potentially emitting a year's worth in just those few days. Also, the raw wheat handling and pre-cleaning have high potential throughput volumes and could provide for the whole year in just a few days of operation. These factors have a potential for bulk release of dust. The permit should include special limits on bulk release during any short period such as an 8 hour day. Also, the permit did not appear to include specifications for disposal of the dust once collected, and how it would be prevented from reaching the river.

Response to Comment 2:

It is true that the receiving, raw wheat handling and pre-cleaning have high potential throughput rates and could provide for the whole year's supply in a few days of operation. The Whitewater Mill is designed to store a maximum of 960,000 bushels, or 28,800 tons, of pre-cleaned raw grain. However, as indicated in the Response to Comment 1, above, permit conditions D.1.1, D.1.2, and D.1.3, all limit the potential to emit of these operations under the authority of PSD (Prevention of Significant Deterioration), FESOP (Federally Enforceable State Operating Permit), and 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County). These conditions limit the short term hourly particulate emissions (in pounds per hour) with the exception of 326 IAC 6.5-1-2, which limits the particulate concentration (in units of grains per dry standard cubic foot of outlet exhaust air) in the baghouse outlet exhaust air stream. As noted above in Response to Comment 1, item 7, the baghouses are designed to operate consistently well below the limits required by this rule.

The raw wheat unloading (from both rail and truck) and handling operations will occur within a building. The receiving pits as well as the conveying elements are aspirated. This collects any dust

and keeps the system under a slight negative pressure. The collected dust is ducted to the associated baghouse where the dust and air are separated within the bag filter system, and the dust is returned to the intake system while the cleaned air is vented to atmosphere. The wheat pre-cleaning takes place in a separate pre-cleaning building. This building has a separate air-make up unit. All pre-cleaning equipment is aspirated (machines under negative pressure) and all dust is removed using an aspiration system, which is then ducted to a baghouse. Dust and air is separated within the baghouse filters and the dust is returned to the screenings bin while the cleaned air is vented to atmosphere. The dust that is collected in the screenings bin is later sent to be ground in the mill and then reintroduced to the milling process.

No changes were made as a result of this comment. Also, see Response to Comment 1.

Comment 3:

We see no controls for spills occurring during unloading of the grain and how such spills will be controlled and disposed of so that they do not create dust or migrate to the river.

Response to Comment 3:

As indicated above in the Response to Comment 2, the raw wheat unloading and handling operations will occur within a building. The receiving pits are designed to limit grain spillage and are equipped with dust control systems. Whitewater Mill indicates that a cleaning procedure, as required by the Food and Drug Administration's regulations for food safety and good manufacturing practices (21 CFR Part 110), is in place. In the event that grain is spilled during the unloading process, the driver will sweep the spilled grain into the pit. At the end of each day, elevator personnel will clean the grain receiving areas.

Also, as indicated above in Response to Comment 1, item 7, Condition D.1.3 of the permit incorporates the requirements of 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), which aside from limiting particulate emissions also requires specific housekeeping and maintenance procedures designed to minimize the opportunity for particulate matter to become airborne and leave the property.

For more information regarding what constitutes a spill, please see the IDEM Emergency Response website at <http://www.in.gov/idem/4155.htm>.

To obtain additional information or to file a complaint related to air, land, and/or water issues, please see the Response to Comment 1, above.

No changes were made as a result of this comment.

Comment 4:

The calculation of the amount of chlorine that is permitted to escape per year at the rate of 0.01% of the amount used is 52.5 lbs/year and not the 0.184 lbs/year listed. Also, we did not see anything information pertaining to controls for storing the 525,000 lbs of chlorine used each year or controls on any escaping Chlorine from the storage area or connections to equipment in the permit or technical support documents.

Response to Comment 4:

The chlorination system is designed to pull chlorine gas from the storage tanks by means of a vacuum and meters it through specifically designed rotameters (flow meters) that are graduated to show volumetric ounces per hour of chlorine gas flow. The volume, or amount, of chlorine gas added to the flour stream will be based on each customer's specifications for specific flour characteristics, such as pH and structure forming capacity of the flour. Whitewater Mill indicates that each customer has different requirements. "Recipes", using the chlorinator settings as a guide, are used and adjustments are made, as needed, after starting a run and testing the pH of the flour. The

potential to emit (PTE) chlorine from the chlorination system has been calculated based on a worst case scenario using the maximum volume of chlorine gas per weight of flour and the bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year, combined, per year (see the "Process Bottleneck" section of the TSD, pages 10 and 11 of 23, and TSD Appendix A: Emission Calculations, page 5 of 8). As noted in the TSD, page 12 of 23, the maximum amount of chlorine gas that will be used is two (2) ounces by volume per 100 pounds of flour, but typically, it will be one (1) ounce by volume for most customers. Also, Whitewater Mill will only chlorinate at most 30% of its total production, or 65,700 tons per year of the flour. The PTE from the use of chlorine gas, based on a worst case scenario using the maximum volume of chlorine gas per weight of flour and the bottlenecked throughput, is still negligible.

As previously noted, the chlorine system is designed to work under vacuum. According to Whitewater Mill, in the event of a line breakage or leak, the system loses vacuum and chlorine flow is stopped. Also, in the event of a leak in the chlorine room and the pressure side, a chlorine sensor alarms and triggers at concentrations of one (1) part per million (ppm), activating the emergency shut off system and automatically closing the tank valves. In the event that a tank is leaking, local emergency responders will be called to contain the leak. In Whitewater Mill's case, the Harrison Fire Department will provide service. The Fire Chief has indicated that the Harrison Fire Department is Type 3 Department, which means they are self sustainable for up to 24 hours. They have 10-12 people on each shift, with 3 shifts plus County Hazmat. Six (6) officers are trained in WMD (weapons of mass destruction) response, and six (6) are trained in chlorine leak response and are Hazmat technicians.

No changes were made as a result of this comment.

Comment 5:

We understand that the draft permit limits particulate matter and greenhouse gases to less than 100 tons per twelve consecutive month period, which seems excessive to us — source operation condition C.2(a)(1). Furthermore, while we concur with source operations condition C.6 that the Permittee shall not allow fugitive dust to escape beyond its own property, once fugitive dust escapes into the atmosphere it is virtually impossible to prevent it from being blown offsite. We suggest a tougher standard to prevent the escape of fugitive dust even on-site to the extent that fugitive dust could be controlled by best available practices.

Response to Comment 5:

According to the emissions reported in the TSD Appendix A: Emission Calculations, this source qualifies for a Part 70 Permit (aka Title V Permit). However, this source has voluntarily elected to limit its potential emissions under the Federally Enforceable State Operating Permit (FESOP) program (326 IAC 2-8). Section C of the permit contains the source-wide limitations and requirements to operation under a FESOP. Accordingly, Section C requirements are common to all FESOP sources. Conversely, the limitations and requirements contained in Section D are both source specific and emission unit specific, and add refinement to the limitations and requirements contained in Section C.

For example, the following pollutants are limited as indicated below:

1. PM (particulate matter with an aerodynamic diameter smaller than one hundred (100) micrometers (μm)):

Condition C.2(b) of the permit limits the potential to emit PM from the entire source to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This requirement is intended to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Condition D.1.1 of the permit limits PM from various processes (controlled by baghouses) at this source in order to limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period to render the requirements of 326 IAC 2-2

(Prevention of Significant Deterioration (PSD)) not applicable. Based on 8760 hours of operation, the limited source-wide PM emissions are 198.71 tons/yr.

2. PM10, particulate matter particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (μm), and PM2.5, particulate matter with an aerodynamic diameter less than or equal to a nominal two and five-tenths (2.5) micrometers (μm):

Condition C.2(a)(1) of the permit limits the potential to emit PM10 and PM2.5 from the entire source to less than to less than major source levels (to less than one hundred (100) tons per twelve (12) consecutive month period) for the purpose of Section 502(a) of the Clean Air Act.

Condition D.1.2 of the permit limits PM10 and PM2.5 from various processes (controlled by baghouses) at this source in order to limit the source-wide total potential to emit PM10 and PM2.5 to less than 100 tons per 12 consecutive month period, each, to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable. Based on 8760 hours of operation, the limited source-wide PM10 emissions are 98.13 tons/yr and the limited source-wide PM2.5 emissions are 81.69 tons/yr.

3. Greenhouse Gases (GHGs):

Condition C.2(a)(4) of the permit limits the potential to emit GHGs from the entire source to less than major source levels (one hundred thousand (100,000) tons of CO2 equivalent emissions (CO2e) per twelve (12) consecutive month period).

No limit has been included in Section D of the permit because the potential to emit GHGs from the entire source is 0.00 tons year. There will be no combustion units or greenhouse gas (GHG) forming processes included in the construction of this new source.

Also, as indicated above in Response to Comment 1, fugitive particulate emissions are limited by the requirements in Conditions C.3 and C.6, and D.3 and D.7.

The federal Clean Air Act requires the U.S. EPA to set National Ambient Air Quality Standards (NAAQS) for six criteria pollutants, ozone, particulate matter, nitrogen oxides, sulfur dioxide, carbon monoxide, and lead. More information about these pollutants is available at <http://www.epa.gov/ttn/naaqs/> on U.S. EPA's website. The complete table of the NAAQS can be found at the <http://www.epa.gov/air/criteria.html> website.

IDEM has no authority to create any permit limits or measures in excess of what is legally required for a regulated source. The Indiana air permitting requirements applicable to this source are part of the state implementation plan (SIP) approved by the U.S. EPA. Environmental laws are enacted by the Indiana legislature. The legislature has also given rulemaking authority to the Indiana Environmental Rules Board. More information about the rulemaking process is available at <http://www.in.gov/idem/4087.htm> and <http://www.in.gov/idem/4710.htm> on IDEM's Website.

IDEM encourages all sources in the state to take measures to reduce negative impacts to the environment, including recycling and pollution prevention. Additional information on recycling and pollution prevention can be found at the following IDEM website: <http://www.in.gov/idem/prevention/> and <http://www.in.gov/idem/recycle/>

To file a complaint related to air, land, and/or water pollution, please see the Response to Comment 1, above.

No changes were made as a result of this comment.

Additional Changes

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

- The emission limits contained in Conditions D.1.1 and D.1.2 of the permit and the emission calculations, were revised to correct an inadvertent error. Based on the corrected limits, the limited source-wide potential to emit of PM10 is less than 100 tons per year. See ATSD Appendix A: Emission Calculations (pages 1 and 8 of 8) for updated limited PTE calculations and the tables contained below in the ATSD Section entitled PTE of the Entire Source After Issuance of the FESOP. The permit has been revised as follows:

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

Emissions Unit Description (Unit ID)	Process	Baghouse or Filter #	PM Limitation (lbs/hr)
*****	*****	*****	*****
Cleaning House (AUMF-60770)	Cleaning	05	4.162.77
*****	*****	*****	*****
Byproducts & Mill Feed Handling, Storage, & Loadout (AUMF 60778)	Bran Bins	12	1.390.93
*****	*****	*****	*****

D.1.2 FESOP Limits: PM10 and PM2.5, [326 IAC 2-8-4][326 IAC 2-2]

Emissions Unit Description (Unit ID)	Process	Baghouse or Filter #	PM10 Limitation (lbs/hr)	PM2.5 Limitation (lbs/hr)
*****	*****	*****	*****	*****
Cleaning House (AUMF-60770)	Cleaning	05	1.722.58	1.722.58
*****	*****	*****	*****	*****
Byproducts & Mill Feed Storage, Handling & Loadout (AUMF 60778)	Bran Bins	12	0.570.86	0.570.86
*****	*****	*****	*****	*****

- Condition D.1.6 has been revised for clarity, as follows:

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

- In order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM, PM10, and PM2.5 emissions stack testing not later than 180 days after startup, utilizing methods approved by the Commissioner, for the following control devices:

These tests shall be repeated at least once every five (5) years from the date of **the most recent** ~~this~~ valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable particulate matter.

No other changes have been made to the permit.

PTE of the Entire Source After Issuance of the FESOP

This table 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 revision (tons/year)									
	PM	PM10*	PM2.5*	SO2	NOx	VOC	CO	GHGs as CO2e***	Total HAPs ⁽¹⁾	Worst Single HAP ⁽¹⁾
Whole Grain Receiving, Pre-cleaning, Handling** (AUMF-60787)	39.14	24.27	24.27	0	0	0	0	0	0	NA
Whole Grain Storage - Bin Vents ⁽¹⁾ (AUMF-60787)	53.66	13.52	2.36	0	0	0	0	0	0	NA
Cleaning House** (AUMF-60770)	16.64 22.74	10.32 14.08	10.32 14.08	0	0	0	0	0	0	NA
Mill House** (AUMF-60769)	37.11	23.01	23.01	0	0	0	0	0	0	NA
Finished Product Handling** (AUMF-60629)	8.11	5.03	5.03	0	0	0	0	0	9.20E ⁻⁰⁵	9.20E ⁻⁰⁵ (chlorine)
Finished Product Storage & Loadout** (AUMF-60775)	24.61	12.60	9.96	0	0	0	0	0	0	NA
Byproducts & Mill feed storage, handling and loadout** (AUMF 60778)	19.44 24.47	9.39 10.65	6.75 8.04	0	0	0	0	0	0	NA
Total PTE of Entire Source	198.71 206.84	98.13 103.15	81.69 86.74	0	0	0	0	0	0	NA
Title V Major Source Thresholds***	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds***	250	250	250	250	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fugitive Emissions (Paved Roads)****	6.87	1.37	0.34	0	0	0	0	0	0	NA
negl. = negligible NA = Not Applicable. * 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". ** Limited PTE based upon a pound per hour emission limit to render the requirements of 326 IAC 2-2 (PSD) not applicable. ** Limited PTE based upon a pound per hour emission limit to comply with 326 IAC 2-8 (FESOP). *** The 100,000 CO2e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD. **** Fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability. See the "Fugitive Emissions" section, of this TSD, above for more detail. (1) Unlimited/Uncontrolled emissions										

The table below summarizes the potential to emit of the entire source after issuance of this (*revision or amendment*), reflecting all limits, of the emission units. (*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 After Issuance of FESOP (tons/year)									
	PM	PM10*	PM2.5*	SO2	NOx	VOC	CO	GHGs as CO2e***	Total HAPs ⁽¹⁾	Worst Single HAP ⁽¹⁾
Whole Grain Receiving, Pre-cleaning, Handling** (AUMF-60787)	39.14	24.27	24.27	0	0	0	0	0	0	NA
Whole Grain Storage - Bin Vents ⁽¹⁾ (AUMF-60787)	53.66	13.52	2.36	0	0	0	0	0	0	NA
Cleaning House** (AUMF-60770)	16.64	10.32	10.32	0	0	0	0	0	0	NA
Mill House** (AUMF-60769)	37.11	23.01	23.01	0	0	0	0	0	0	NA
Finished Product Handling** (AUMF-60629)	8.11	5.03	5.03	0	0	0	0	0	9.20E ⁻⁰⁵	9.20E ⁻⁰⁵ (chlorine)
Finished Product Storage & Loadout** (AUMF-60775)	24.61	12.60	9.96	0	0	0	0	0	0	NA
Byproducts & Mill feed storage, handling and loadout** (AUMF 60778)	19.44	9.39	6.75	0	0	0	0	0	0	NA
Total PTE of Entire Source	198.71	98.13	81.69	0	0	0	0	0	0	NA
Title V Major Source Thresholds***	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds***	250	250	250	250	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fugitive Emissions (Paved Roads)****	6.87	1.37	0.34	0	0	0	0	0	0	NA
negl. = negligible NA = Not Applicable. * 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". ** Limited PTE based upon a pound per hour emission limit to render the requirements of 326 IAC 2-2 (PSD) not applicable. ** Limited PTE based upon a pound per hour emission limit to comply with 326 IAC 2-8 (FESOP). *** The 100,000 CO2e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD. **** Fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability. See the "Fugitive Emissions" section, of this TSD, above for more detail. (1) Unlimited/Uncontrolled emissions										

IDEM Contact

- Questions regarding this proposed permit can be directed to Ms. Hannah Desrosiers 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) 233-9327 or toll free at 1-800-451-6027 extension 3-9327.
- A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

ATSD Appendix A: Emissions Calculations
Entire Source Summary

Company Name: Whitewater Mill, LLC
Address City IN Zip: 707 Harrison Brookville Road,
West Harrison, Indiana 47060
Permit No.: F029-34507-00045
Reviewer: Hannah L. Desrosiers

Emission Unit Description	Unit ID	Unlimited/Uncontrolled Potential to Emit (tons/year)										
		Criteria Pollutants							Greenhouse Gas Pollutants	Hazardous Air Pollutants		
		PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Case HAP	
Ducted/Ductable Emissions												
Whole Grain Receiving, Pre-cleaning, & Handling	AUMF-60787	12,309	7,632	7,632	0	0	0	0	0	0	0	NA
Whole Grain Storage - Bin Vents	AUMF-60787	53.66	13.52	2.36	0	0	0	0	0	0	0	NA
Cleaning House	AUMF-60770	3,331	2,065	2,065	0	0	0	0	0	0	0	NA
Mill House	AUMF-60769	27,214	16,873	16,873	0	0	0	0	0	0	0	NA
Finished Product Handling	AUMF-60629	1,190	737.84	738	0	0	0	0	0	9.20E-05	9.20E-05	(chlorine)
Finished Product Storage & Loadout	AUMF-60775	2,238	1,385	1,382	0	0	0	0	0	0	0	NA
Byproducts & Mill Feed Handling, Storage, & Loadout	AUMF-60778	1,777	1,099	1,096	0	0	0	0	0	0	0	NA
Total Unlimited/Uncontrolled Ducted/Ductable Emissions ⁽¹⁾		48,112	29,805	29,788	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(chlorine)
Fugitive Emissions ⁽¹⁾												
Paved Roads		6.87	1.37	0.34	0	0	0	0	0	0	0	NA
Total Fugitive Emissions		6.87	1.37	0.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	NA

NA = Not Applicable.

Total emissions based on rated capacity at 8,760 hours/year.

(1) 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.

Emission Unit Description	Unit ID	Unlimited/Controlled Potential to Emit - After Cyclones (tons/year)										
		Criteria Pollutants							Greenhouse Gas Pollutants	Hazardous Air Pollutants		
		PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs ⁽¹⁾	Worst Case HAP ⁽¹⁾	
Ducted/Ductable Emissions												
Whole Grain Receiving, Pre-cleaning, & Handling ⁽¹⁾	AUMF-60787	12,309	7,632	7,632	0	0	0	0	0	0	0	NA
Whole Grain Storage - Bin Vents ⁽¹⁾	AUMF-60787	53.66	13.52	2.36	0	0	0	0	0	0	0	NA
Cleaning House ⁽¹⁾	AUMF-60770	3,331	2,065	2,065	0	0	0	0	0	0	0	NA
Mill House	AUMF-60769	439.52	272.50	273	0	0	0	0	0	0	0	NA
Finished Product Handling ⁽¹⁾	AUMF-60629	1,190	738	738	0	0	0	0	0	9.20E-05	9.20E-05	(chlorine)
Finished Product Storage & Loadout ⁽¹⁾	AUMF-60775	2,238	1,385	1,382	0	0	0	0	0	0	0	NA
Byproducts & Mill Feed Handling, Storage, & Loadout ⁽¹⁾	AUMF-60778	1,777	1,099	1,096	0	0	0	0	0	0	0	NA
Total Unlimited/Uncontrolled Ducted/Ductable Emissions ⁽²⁾		21,338	13,205	13,188	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(chlorine)
Fugitive Emissions ⁽²⁾												
Paved Roads ⁽¹⁾		6.87	1.37	0.34	0	0	0	0	0	0	0	NA
Total Fugitive Emissions		6.87	1.37	0.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	NA

NA = Not Applicable.

Total emissions based on rated capacity at 8,760 hours/year.

(1) Unlimited/Uncontrolled emissions

(2) 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.

ATSD Appendix A: Emissions Calculations
Entire Source Summary

Company Name: Whitewater Mill, LLC
Address City IN Zip: 707 Harrison Brookville Road,
West Harrison, Indiana 47060
Permit No.: F029-34507-00045
Reviewer: Hannah L. Desrosiers

Emission Unit Description	Unit ID	Unlimited/Controlled Potential to Emit - After Baghouses (tons/year)										
		Criteria Pollutants							Greenhouse Gas Pollutants	Hazardous Air Pollutants		
		PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs ⁽¹⁾	Worst Case HAP ⁽¹⁾	
Ducted/Ductable Emissions												
Whole Grain Receiving, Pre-cleaning, & Handling	AUMF-60787	12.31	7.63	7.63	0	0	0	0	0	0	0	NA
Whole Grain Storage - Bin Vents ⁽¹⁾	AUMF-60787	53.66	13.52	2.36	0	0	0	0	0	0	0	NA
Cleaning House	AUMF-60770	3.33	2.07	2.07	0	0	0	0	0	0	0	NA
Mill House	AUMF-60769	5.44	3.37	3.37	0	0	0	0	0	0	0	NA
Finished Product Handling	AUMF-60629	1.19	0.74	0.74	0	0	0	0	0	9.20E-05	9.20E-05	(chlorine)
Finished Product Storage & Loadout	AUMF-60775	11.65	4.56	1.92	0	0	0	0	0	0	0	NA
Byproducts & Mill Feed Handling, Storage, & Loadout	AUMF-60778	11.18	4.27	1.63	0	0	0	0	0	0	0	NA
Total Unlimited/Uncontrolled Ducted/Ductable Emissions ⁽²⁾		98.76	36.16	19.72	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(chlorine)
Fugitive Emissions ⁽²⁾												
Paved Roads ⁽¹⁾		6.87	1.37	0.34	0	0	0	0	0	0	0	NA
Total Fugitive Emissions		6.87	1.37	0.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	NA

NA = Not Applicable.
Total emissions based on rated capacity at 8,760 hours/year.
(1) Unlimited/Uncontrolled emissions
(2) 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.

Process Description	Unit ID	Limited/Controlled Potential to Emit (tons/year)										
		Criteria Pollutants							Greenhouse Gas Pollutants	Hazardous Air Pollutants		
		PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs ⁽¹⁾	Worst Case HAP ⁽¹⁾	
Ducted/Ductable Emissions												
Whole Grain Receiving, Pre-cleaning, & Handling	AUMF-60787	39.14	24.27	24.27	0	0	0	0	0	0	0	NA
Whole Grain Storage - Bin Vents ⁽¹⁾	AUMF-60787	53.66	13.52	2.36	0	0	0	0	0	0	0	NA
Cleaning House	AUMF-60770	16.64	10.32	10.32	0	0	0	0	0	0	0	NA
Mill House	AUMF-60769	37.11	23.01	23.01	0	0	0	0	0	0	0	NA
Finished Product Handling	AUMF-60629	8.11	5.03	5.03	0	0	0	0	0	9.20E-05	9.20E-05	(chlorine)
Finished Product Storage & Loadout	AUMF-60775	24.61	12.60	9.96	0	0	0	0	0	0	0	NA
Byproducts & Mill Feed Handling, Storage, & Loadout	AUMF-60778	19.44	9.39	6.75	0	0	0	0	0	0	0	NA
Total Limited/Controlled Ducted/Ductable Emissions ⁽²⁾		198.71	98.13	81.69	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(chlorine)
Fugitive Emissions ⁽²⁾												
Paved Roads ⁽¹⁾		6.87	1.37	0.34	0	0	0	0	0	0	0	NA
Total Fugitive Emissions		6.87	1.37	0.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	NA

NA = Not Applicable.
Total emissions based on rated capacity at 8,760 hours/year.
(1) Unlimited/Uncontrolled emissions
(2) 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.

**ATSD Appendix A: Emissions Calculations
Unrestricted Potential Emissions (tons/year)
Particulate (PM/PM10/PM2.5)**

Company Name: Whitewater Mill, LLC
Address City IN Zip: 707 Harrison Brookville Road, West Harrison, Indiana 47060
Permit No.: F029-34507-00045
Reviewer: Hannah L. Desrosiers

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Unit ID	Emission Unit Description	Throughput (tons/hr)	PM Emission Factor (lb/ton)	PM10 Emission Factor (lb/ton)	PM2.5 Emission Factor (lb/ton)	PM Emissions (tons/yr)	PM10 Emissions (tons/yr)	PM2.5 Emissions (tons/yr)
Ducted/Ductable Emissions								
AUMF-60787	Whole Grain Storage - Bin Vents ^(a)	490	0.025	0.0063	0.0011	53.66	13.52	2.36

Methodology

Total emissions based on rated capacity at 8,760 hours/year.

Emission Factors are from AP 42, Chapter 9.9.1 Grain Elevators And Processes, Tables 9.9.1-1. Particulate Emission Factors for Grain Elevators and 9.9.1-2. Particulate Emission Factors for Grain Processing Facilities.

(a) Total Storage = 960,000 bushels

PM/PM10/PM2.5 Emissions (tons/yr) = Throughput (tons/hr) x Emission Factor (lb/ton) * 8760 hr/yr / 2000 lb/ton

ATSD Appendix A: Emission Calculations
Unrestricted Potential Emissions (tons/year)
Particulate (PM/PM10/PM2.5)

Company Name: Whitewater Mill, LLC
Address City IN Zip: 707 Harrison Brookville Road, West Harrison, Indiana 47060
Permit No.: F029-34507-00045
Reviewer: Hannah L. Desrosiers

Emissions Unit Description (Unit ID)	Process	Cyclone Control Efficiency (%)*	Stack ID	Baghouse or Filter #	BH Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (m³/m.)	Gas or Air Flow Rate (ft³/m.)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)	PM10 Emission Rate after Controls (lb/hr)**	PM10 Emission Rate after Controls (tons/yr)**	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM10 Emission Rate before Controls (lb/hr)**	PM10 Emission Rate before Controls (tons/yr)**
Receiving, Pre-cleaning, & Handling (AUMF-60787)	Wheat Intake	n/a	S1	01	99.9%	0.0044	770	27,192.55	1.03	4.49	0.64	2.78	1,025.55	4,491.90	635.84	2,784.98
	Pre-cleaning	n/a	S2	02	99.9%	0.0044	1304	46,050.76	1.74	7.61	1.08	4.72	1,736.77	7,607.06	1,076.80	4,716.38
	Silo chain conveyor	n/a	S3	03	99.9%	0.0044	36	1,271.34	0.05	0.21	0.03	0.13	47.95	210.01	29.73	130.21
Cleaning House (AUMF-60770)	Cleaning	n/a	S5	05	99.9%	0.0044	458	16,174.27	0.61	2.67	0.38	1.66	610.00	2,671.80	378.20	1,656.52
	Screenings	n/a	S6	06	99.9%	0.0044	75	2,648.63	0.10	0.44	0.06	0.27	99.89	437.52	61.93	271.26
	Light Wheat Bin	n/a	n/a	17	99.9%	0.0044	6	211.89	0.01	0.04	0.00	0.02	7.99	35.00	4.95	21.70
	Ung. Screenings Bin	n/a	n/a	18	99.9%	0.0044	27	953.51	0.04	0.16	0.02	0.10	35.96	157.51	22.30	97.66
	Ground Screenings Bin	n/a	n/a	19	99.9%	0.0044	5	176.58	0.01	0.03	0.00	0.02	6.66	29.17	4.13	18.08
Mill House (AUMF-60769)	Mill - pneumatic	80.0%	S7	07	99.9%	0.0044	330	11,653.95	0.44	1.93	0.27	1.19	2,197.60	9,625.50	1,362.51	5,967.81
	Mill - pneumatic	80.0%	S8	08	99.9%	0.0044	330	11,653.95	0.44	1.93	0.27	1.19	2,197.60	9,625.50	1,362.51	5,967.81
	Mill - aspiration	80.0%	S9	09	99.9%	0.0044	273	9,641.00	0.36	1.59	0.23	0.99	1,818.02	7,962.91	1,127.17	4,937.00
Finished Product Handling (AUMF-60629)	Total Receiver High Ash Flour Line	n/a	n/a	20	99.9%	0.0044	5	176.58	0.01	0.03	0.00	0.02	6.66	29.17	4.13	18.08
	Start Up Bin	n/a	n/a	21	99.9%	0.0044	54	1,907.01	0.07	0.32	0.04	0.20	71.92	315.02	44.59	195.31
	Airlock Hopper CLEAR Flour	n/a	n/a	22	99.9%	0.0044	7	247.21	0.01	0.04	0.01	0.03	9.32	40.84	5.78	25.32
	Airlock Hopper CAKE Flour	n/a	n/a	23	99.9%	0.0044	7	247.21	0.01	0.04	0.01	0.03	9.32	40.84	5.78	25.32
	Airlock Hopper PATENT Flour	n/a	n/a	24	99.9%	0.0044	7	247.21	0.01	0.04	0.01	0.03	9.32	40.84	5.78	25.32
	Airlock Hopper WHOLE WHEAT FL.	n/a	n/a	25	99.9%	0.0044	7	247.21	0.01	0.04	0.01	0.03	9.32	40.84	5.78	25.32
	Total Receiver HIGH ASH FL.	n/a	n/a	26	99.9%	0.0044	3	105.95	0.004	0.02	0.002	0.01	4.00	17.50	2.48	10.85
	Airlock Hopper FLOUR To Packing	n/a	n/a	27	99.9%	0.0044	10	353.15	0.01	0.06	0.01	0.04	13.32	58.34	8.26	36.17
	Airlock Hopper FLOUR To Packing	n/a	n/a	28	99.9%	0.0044	10	353.15	0.01	0.06	0.01	0.04	13.32	58.34	8.26	36.17
	WHOLE WHEAT Bin	n/a	n/a	29	99.9%	0.0044	41	1,447.92	0.05	0.24	0.03	0.15	54.61	239.18	33.86	148.29
	HIGH ASH Bin	n/a	n/a	30	99.9%	0.0044	12	423.78	0.02	0.07	0.01	0.04	15.98	70.00	9.91	43.40
	CAKE FLOUR Bin	n/a	n/a	31	99.9%	0.0044	41	1,447.92	0.05	0.24	0.03	0.15	54.61	239.18	33.86	148.29
	Total Receiver	n/a	S10	10	99.9%	0.0044	53	1,871.70	0.07	0.31	0.04	0.19	70.59	309.18	43.77	191.69
Finished Product Storage (AUMF-60775)	Flour line sifter to load out bins	n/a	n/a	33	99.9%	0.0044	7	247.21	0.01	0.04	0.01	0.03	9.32	40.84	5.78	25.32
	Total Receiver Vacuum System	n/a	n/a	34	99.9%	0.0044	27	953.51	0.04	0.16	0.02	0.10	35.96	157.51	22.30	97.66
	Packer aspiration filter	n/a	n/a	35	99.9%	0.0044	20	706.30	0.03	0.12	0.02	0.07	26.64	116.67	16.52	72.34
	PATENT packing bin	n/a	n/a	36	99.9%	0.0044	55	1,942.33	0.07	0.32	0.05	0.20	73.25	320.85	45.42	198.93
	PATENT packing bin	n/a	n/a	37	99.9%	0.0044	55	1,942.33	0.07	0.32	0.05	0.20	73.25	320.85	45.42	198.93
	OUTLOAD bin	n/a	n/a	39	99.9%	0.0044	55	1,942.33	0.07	0.32	0.05	0.20	73.25	320.85	45.42	198.93
	OUTLOAD bin	n/a	n/a	40	99.9%	0.0044	55	1,942.33	0.07	0.32	0.05	0.20	73.25	320.85	45.42	198.93
	OUTLOAD bin	n/a	n/a	41	99.9%	0.0044	55	1,942.33	0.07	0.32	0.05	0.20	73.25	320.85	45.42	198.93
Byproducts & Mill Feed Handling & Storage (AUMF 60778)	Bran bins	n/a	S12	12	99.9%	0.0044	153	5,403.20	0.20	0.89	0.13	0.55	203.78	892.55	126.34	553.38
	Mill Feed Outload	n/a	S13	13	99.9%	0.0044	33	1,165.40	0.04	0.19	0.03	0.12	43.95	192.51	27.25	119.36
	Mill Feed Outload	n/a	S14	14	99.9%	0.0044	33	1,165.40	0.04	0.19	0.03	0.12	43.95	192.51	27.25	119.36
	Mill Feed Outload	n/a	S15	15	99.9%	0.0044	33	1,165.40	0.04	0.19	0.03	0.12	43.95	192.51	27.25	119.36
	Mill Feed Outload	n/a	S16	16	99.9%	0.0044	33	1,165.40	0.04	0.19	0.03	0.12	43.95	192.51	27.25	119.36
	RED DOG bin	n/a	n/a	43	99.9%	0.0044	18	635.67	0.02	0.11	0.01	0.07	23.97	105.01	14.86	65.10
Totals:									6.00	26.27	3.72	16.29	10,968.03	48,039.98	6,800.18	29,784.79

NOTES
Total emissions based on rated capacity at 8,760 hours/year.
The emissions from this source have been calculated based on the control device specifications, where applicable.
The "Gas or Air Flow Rate" was provided by the source as cubic meters per minute (m³/min). For the purposes of these emissions calculations, the cubic meters per minute (m³/min) have been converted to cubic feet per minute (ft³/min).
Constant: according to Ap 42, ATSD Appendix A: Miscellaneous Data and Conversion Factors - Conversion Factors (09/85, page A22): 1 cubic meter/minute (m3/min) = 35.315 cubic feet per minute (ft3/min).
*Cyclone Control Efficiency (%) taken from the US EPA Air Pollution Control Technology Fact Sheet: Cyclones (EPA-452/F-03-005), and represents the average of the achievable control efficiency range.
** PM 2.5 emissions are assumed equal to PM10 emissions.

Methodology
Gas or Air Flow Rate (cubic feet per minute (ft3/min)) = [Gas or Air Flow Rate (cubic meters per minute (m3/min)) * 35.315]
PM Emission Rate in lbs/hr (after controls) = [(grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)]
PM Emission Rate in lbs/hr (before controls) = [(Controlled emission rate lb/hr) / (1- control efficiency)]
Mill House (AUMF-60769) PM Emission Rate in lbs/hr (before controls) = [((Controlled emission rate lb/hr) / (1- BH control efficiency)) / (1- cyclone control efficiency)]
PM10 Emission Rate in lbs/hr = [PM Emission Rate (lbs/hr) * 62/100]
Emission Rate in tons/yr = [(lbs/hr) (8760 hr/yr) (ton/2000 lb)]

**ATSD Appendix A: Emission Calculations
Unrestricted Potential Emissions (tons/year)
Hazardous Air Pollutants (HAPs) from the
Chlorine Gas Flour Bleaching System**

Company Name: Whitewater Mill, LLC
Address City IN Zip: 707 Harrison Brookville Road,
 West Harrison, Indiana 47060
Permit No.: F029-34507-00045
Reviewer: Hannah L. Desrosiers

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Material	Maximum Material Usage (oz Cl gas/lbs flour)	Maximum Material Usage (oz Cl gas/ton flour)	Maximum Throughput of Flour (tons/yr)	Maximum Material Usage (oz Cl gas/year)	Percent Chlorine Emitted from Process (%)	Potential to emit Chlorine (tons/yr)
Chlorine gas	0.02	40	219,000	8,760,000	0.01%	9.20E-05

Notes

Total emissions based on rated capacity at 8,760 hours/year.

Whitewater Mill LLC indicates that the amount of chlorine gas added to the process (i.e., the usage rate) is approx. 2 oz. per 100 lbs of finished flour.

The process is specifically designed to consume more than 99.99% of the gas.

It is assumed that the chlorine gas used in the process is 100% HAP.

Constants:

One (1) Liter (L) = 33.81402 ounces (oz)

One (1) pound (lb) = 453.59232 grams (g)

Density of chlorine gas = 3.2204 grams/Liter (g/L) at 0 °C, 1 atmosphere (14.7 psi @ sea lvl).

Reference: Perry, R.H. and Green, D. (Eds.) 1984. Perry's Chemical Engineer's Handbook, 6th Edition, page 3-78. McGraw Hill, Inc., New York, NY. (ISBN: 0-07-049479-7)

Methodology

Maximum Material Usage (oz Cl/lbs flour) = [2 oz. chlorine / 100 lbs of finished flour]

Maximum Material Usage (oz Cl gas/ton flour) = [Maximum Material Usage (oz Cl/lbs flour) * 2000 lbs/1 ton]

Maximum Material Usage (oz Cl gas/year) = [Maximum Material Usage (oz Cl gas/ton flour) * Maximum Throughput of Flour (tons/yr)]

Percent Chlorine Emitted from Process (%) = [1 - (99.99% of Chlorine Gas Consumed in Process)/100%]

PTE of Chlorine (tons/yr) = [(Maximum Material Usage (oz Cl gas/year)) * (1 L/33.81402 oz) * (Density of Chlorine Gas (g/L) * (1 lb/ (453.59232 g) * (1 ton/2000lbs) * (Percent Chlorine Emitted from Process (%))]

ATSD Appendix A: Emissions Calculations
Unrestricted Potential Emissions (tons/year)
Particulate (PM/PM10/PM2.5)

Company Name: Whitewater Mill, LLC
Address City IN Zip: 707 Harrison Brookville Road, West Harrison, Indiana 47060
Permit No.: F029-34507-00045
Reviewer: Hannah L. Desrosiers

Unit ID	Emission Unit Description	Throughput ^(a) (tons/hr)	PM Emission Factor ^(b) (lb/ton)	PM10 Emission Factor ^(b) (lb/ton)	PM2.5 Emission Factor ^(b) (lb/ton)	PM Emissions (tons/yr)	PM10 Emissions (tons/yr)	PM2.5 Emissions (tons/yr)
Ducted/Ductable Emissions								
AUMF-60775	Finished Product Loadout	25	0.086	0.029	0.0049	9.42	3.18	0.54
AUMF 60778	Byproducts & Mill Feed Loadout	25	0.086	0.029	0.0049	9.42	3.18	0.54

Methodology

Total emissions based on rated capacity at 8,760 hours/year.

- (a) The wheat milling operation, contained in the Mill House, is the limiting factor for these facilities and acts as an "operational bottleneck"; therefore, the potential to emit was calculated based on the bottleneck throughput of 25 tons of finished product (wheat flour), byproducts, and/or mill feed per hour (219,000 tons per year).
- (b) Emission Factors are from AP 42, Chapter 9.9.1 Grain Elevators And Processes, Table 9.9.1-1. Particulate Emission Factors for Grain Elevators.
The emission factors for "Truck (unspecified) (SCC 3-02-005-60)" have been used to form a worst-case estimate.

$$\text{PM/PM10/PM2.5 Emissions (tons/yr)} = \text{Throughput (tons/hr)} \times \text{Emission Factor (lb/ton)} \times 8760 \text{ hr/yr} / 2000 \text{ lb/ton}$$

ATSD Appendix A: Emission Calculations
Fugitive Dust Emissions
Paved Roads

Company Name: Whitewater Mill, LLC
Address City IN Zip: 707 Harrison Brookville Road, West Harrison, Indiana 47060
Permit No.: F029-34507-00045
Reviewer: Hannah L. Desrosiers

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 Informtation (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	50.0	1.0	50.0	40.0	2,000.0	850	0.161	8.0	2,938.0
Vehicle (leaving plant) (one-way trip)	50.0	1.0	50.0	15.0	750.0	850	0.161	8.0	2,938.0
			0		0		0	0	0
			0		0		0	0	0
Totals			100.0		2,750.0			16.1	5,875.9

Average Vehicle Weight Per Trip = 27.5 tons/trip
Average Miles Per Trip = 0.16 miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	27.5	27.5	27.5	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, 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 =	2.555	0.511	0.1255	lb/mile
Mitigated Emission Factor, Eext =	2.337	0.467	0.1147	lb/mile
Dust Control Efficiency =	0%	0%	0%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	3.75	0.75	0.18	3.43	0.69	0.17	3.43	0.69	0.17
Vehicle (leaving plant) (one-way trip)	3.75	0.75	0.18	3.43	0.69	0.17	3.43	0.69	0.17
	0	0	0	0	0	0	0	0	0
	0	0	0	0	0	0	0	0	0
Totals	7.51	1.50	0.37	6.87	1.37	0.34	6.87	1.37	0.34

Methodology

Total emissions based on rated capacity at 8,760 hours/year.
Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

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

ATSD Appendix A: Emission Calculations
Controlled Potential Emissions (tons/year)

Company Name: Whitewater Mill, LLC
Address City IN Zip: 707 Harrison Brookville Road, West Harrison, Indiana 47060
Permit No.: F029-34507-00045
Reviewer: Hannah L. Desrosiers

Emissions Unit Description (Unit ID)	Process	Stack ID	Baghouse or Filter #	Grain Loading per Actual Cubic foot of Outlet Air (grains/dry std. cub. ft.)	Gas or Air Flow Rate (m³/m.)	Gas or Air Flow Rate (ft³/m.)	Limited PM Emission Rate (lb/hr)	Limited PM Emission Rate (tons/yr)	Limited PM10 Emission Rate (lb/hr)**	Limited PM10 Emission Rate (tons/yr)**	Equivalent Control Efficiency (%)
Receiving, Pre-cleaning, & Handling (AUMF-60787)	Wheat Intake	S1	01	0.02	770	27,193	4.66	20.42	2.89	12.66	99.55%
	Pre-cleaning	S2	02	0.01	1,304	46,051	3.95	17.29	2.45	10.72	99.77%
	Silo chain conveyor	S3	03	0.03	36	1,271	0.33	1.43	0.20	0.89	99.32%
Cleaning House (AUMF-60770)	Cleaning	S5	05	0.02	458	16,174	2.77	12.14	1.72	7.53	99.55%
	Screenings	S6	06	0.03	75	2,649	0.68	2.98	0.42	1.85	99.32%
	Light Wheat Bin	n/a	17	0.03	6	212	0.05	0.24	0.03	0.15	99.32%
	Ungr. Screenings Bin	n/a	18	0.03	27	954	0.25	1.07	0.15	0.67	99.32%
	Ground Screenings Bin	n/a	19	0.03	5	177	0.05	0.20	0.03	0.12	99.32%
Mill House (AUMF-60769)	Mill - pneumatic	S7	07	0.03	330	11,654	3.00	13.13	1.86	8.14	99.86%
	Mill - pneumatic	S8	08	0.03	330	11,654	3.00	13.13	1.86	8.14	
	Mill - aspiration	S9	09	0.03	273	9,641	2.48	10.86	1.54	6.73	99.86%
Finished Product Handling (AUMF-60629)	Total Receiver High Ash Flour Line	n/a	20	0.03	5	177	0.05	0.20	0.03	0.12	99.32%
	Start Up Bin	n/a	21	0.03	54	1,907	0.49	2.15	0.30	1.33	99.32%
	Airlock Hopper CLEAR Flour	n/a	22	0.03	7	247	0.06	0.28	0.04	0.17	99.32%
	Airlock Hopper CAKE Flour	n/a	23	0.03	7	247	0.06	0.28	0.04	0.17	99.32%
	Airlock Hopper PATENT Flour	n/a	24	0.03	7	247	0.06	0.28	0.04	0.17	99.32%
	Airlock Hopper WHOLE WHEAT FL.	n/a	25	0.03	7	247	0.06	0.28	0.04	0.17	99.32%
	Total Receiver HIGH ASH FL.	n/a	26	0.03	3	106	0.03	0.12	0.02	0.07	99.32%
	Airlock Hopper FLOUR To Packing	n/a	27	0.03	10	353	0.09	0.40	0.06	0.25	99.32%
	Airlock Hopper FLOUR To Packing	n/a	28	0.03	10	353	0.09	0.40	0.06	0.25	99.32%
	WHOLE WHEAT Bin	n/a	29	0.03	41	1,448	0.37	1.63	0.23	1.01	99.32%
	HIGH ASH Bin	n/a	30	0.03	12	424	0.11	0.48	0.07	0.30	99.32%
	CAKE FLOUR Bin	n/a	31	0.03	41	1,448	0.37	1.63	0.23	1.01	99.32%
Finished Product Storage (AUMF-60775)	Total Receiver	S10	10	0.03	53	1,872	0.48	2.11	0.30	1.31	99.32%
	Flour line sifter to load out bins	n/a	33	0.03	7	247	0.06	0.28	0.04	0.17	99.32%
	Total Receiver Vacuum System	n/a	34	0.03	27	954	0.25	1.07	0.15	0.67	99.32%
	Packer aspiration filter	n/a	35	0.03	20	706	0.18	0.80	0.11	0.49	99.32%
	PATENT packing bin	n/a	36	0.03	55	1,942	0.50	2.19	0.31	1.36	99.32%
	PATENT packing bin	n/a	37	0.03	55	1,942	0.50	2.19	0.31	1.36	99.32%
	OUTLOAD bin	n/a	39	0.03	55	1,942	0.50	2.19	0.31	1.36	99.32%
	OUTLOAD bin	n/a	40	0.03	55	1,942	0.50	2.19	0.31	1.36	99.32%
Byproducts & Mill Feed Handling, & Storage (AUMF 60778)	OUTLOAD bin	n/a	41	0.03	55	1,942	0.50	2.19	0.31	1.36	99.32%
	Bran bins	S12	12	0.02	153	5,403	0.93	4.06	0.57	2.52	99.55%
	Mill Feed Outload	S13	13	0.03	33	1,165	0.30	1.31	0.19	0.81	99.32%
	Mill Feed Outload	S14	14	0.03	33	1,165	0.30	1.31	0.19	0.81	99.32%
	Mill Feed Outload	S15	15	0.03	33	1,165	0.30	1.31	0.19	0.81	99.32%
	Mill Feed Outload	S16	16	0.03	33	1,165	0.30	1.31	0.19	0.81	99.32%
	RED DOG bin	n/a	43	0.03	18	636	0.16	0.72	0.10	0.44	99.32%
Totals:							28.82	126.22	17.87	78.26	

Notes

Total emissions based on rated capacity at 8,760 hours/year.
n/a = not applicable. Unit exhausts inside the building.
Constant: according to Ap 42, ATSD Appendix A: Miscellaneous Data and Conversion Factors - Conversion Factors (09/85, page A22): 1 cubic meter/minute (m3/min) = 35.315 cubic feet per minute (ft3/min).
The "Gas or Air Flow Rate" was provided by the source as cubic meters per minute (m³/min). For the purposes of these emissions calculations, the cubic meters per minute (m³/min) have been converted to cubic feet per minute (ft³/min).
** PM 2.5 emissions are assumed equal to PM10 emissions.

Methodology

Gas or Air Flow Rate (cubic feet per minute (ft3/min)) = Gas or Air Flow Rate (cubic meters per minute (m3/min)) * 35.315
Limited PM Emission Rate (lb/hr) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)
Limited PM10 Emission Rate (lbs/hr) = [Limited PM Emission Rate (lbs/hr) * 62/100]
Limited PM/PM10 Emission Rate (tons/yr) = (lbs/hr) (8760 hr/yr) (ton/2000 lb)
Equivalent Control Efficiency (%) = [(1 - (Limited PM Emissions (tons/yr) / Unlimited PTE PM (tons/yr)))*100]

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

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

Source Description and Location

Source Name: Whitewater Mill, LLC
Source Location: 707 Harrison Brookville Road, West Harrison, Indiana 47060
County: Dearborn
SIC Code: 2041 (Flour and Other Grain Mill Products)
Operation Permit No.: F029-34057-00045
Permit Reviewer: Hannah L. Desrosiers

On January 09, 2014, the Office of Air Quality (OAQ) received an application from Whitewater Mill, LLC related to the construction and operation of a new stationary wheat mill.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Dearborn County, Harrison Township. The following attainment status designations are applicable:

Pollutant	Designation
SO ₂	Cannot be classified.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Nonattainment effective July 20, 2012, for the 2008 8-hour ozone standard for Lawrenceburg Township. Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard for the remainder of the county. ¹
PM _{2.5}	Attainment effective December 23, 2011, for the annual PM _{2.5} standard for Lawrenceburg Township. Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard for the remainder of the county. Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

(Air Pollution Control Division; 326 IAC 1-4-16; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA; filed Oct 15, 2010, 1:51 p.m.: 20101110-IR-326100342FRA; filed Jun 12, 2012, 3:22 p.m.: 20120711-IR-326120044FRA; filed Jan 30, 2013, 12:34 p.m.: 20130227-IR-326110774FRA; filed Oct 25, 2013, 2:41 p.m.: 20131120-IR-326130164FRA)

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Dearborn County, Harrison Township, has been

designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) PM_{2.5}
Dearborn County, Harrison Township, has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) SO₂
Dearborn County, Harrison Township, has been classified as attainment for SO₂. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Lead
Dearborn County, Harrison Township, has been classified as attainment or unclassifiable for lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (e) Other Criteria Pollutants
Dearborn County, Harrison Township, has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Background and Description of New Source Construction
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The Office of Air Quality (OAQ) has reviewed an application, submitted by Whitewater Mill, LLC on January 09, 2014, relating to the construction and operation of a new stationary wheat mill.

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

- (a) Whole Grain Receiving, Handling, Pre-Cleaning, and Storage Operations, identified as emission unit AUMF-60787, approved in 2014 for construction, having a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year, and consisting of the following:
 - (1) Whole Grain Receiving, with a maximum throughput capacity of 550 tons of raw wheat per hour, controlling particulate emissions with one (1) baghouse, identified as Filter #01, exhausting to stack S1, and including:
 - (A) One (1) partially enclosed truck unloading area; and
 - (i) Intake hopper(s); and
 - (ii) Enclosed conveyors;
 - (B) One (1) partially enclosed railcar unloading area.
 - (i) Intake hopper(s); and

- (ii) Enclosed conveyors;
- (2) Grain Handling, Pre-Cleaning, and Storage, with a maximum throughput capacity of 490 tons of raw wheat per hour, and including:
 - (A) Fourteen (14) enclosed conveyors, controlling particulate emissions with two (2) baghouses, identified as Filter #02 and Filter #03, exhausting to stacks S2 and S3;
 - (B) Four (4) enclosed bucket elevators;
 - (C) Enclosed headhouse distribution system;
 - (D) Two (2) intake pre-cleaning machine(s); and
 - (E) Fourteen (14) storage bins, with a total [combined] maximum storage capacity of 960,000 bushels, uncontrolled and exhausting outside the building;
- (b) Cleaning House, identified as emission unit AUMF-60770, approved in 2014 for construction, with a maximum capacity of 30 tons of raw wheat per hour and a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year, and including:
 - (1) Four (4) raw wheat bins, with a total storage capacity of 400 tons;
 - (2) Three (3) enclosed bucket elevators;
 - (3) Seven (7) enclosed conveyors;
 - (4) Grain cleaning operation, controlling particulate emissions with one (1) baghouse, identified as Filter #5, exhausting to Stack S5, and including:
 - (A) Separator(s);
 - (B) Aspirator(s);
 - (C) Magnetic Separator(s);
 - (D) Disc separator(s);
 - (E) Washer-Stoner(s);
 - (F) Scourer(s);
 - (G) Surge Bin;
 - (5) Tempering Bin(s);
 - (6) Enclosed pneumatic conveying, controlling particulate emissions with one (1) baghouse, identified as Filter #6, and exhausting to Stack S6; and
 - (7) Three (3) cleaned wheat bins, with a total storage capacity of 300 tons, including:
 - (A) One (1) light wheat bin, with a total storage capacity of 100 tons, controlling particulate emissions with one (1) baghouse, identified as Filter #17, and exhausting inside the building;

- (B) One (1) un-ground screenings bin, with a total storage capacity of 100 tons, controlling particulate emissions with one (1) baghouse, identified as Filter #18, and exhausting inside the building; and
 - (C) One (1) ground screenings bin, with a total storage capacity of 100 tons, controlling particulate emissions with one (1) baghouse, identified as Filter #19, and exhausting inside the building.
- (c) Mill House, identified as emission unit AUMF-60769, approved in 2014 for construction, with a maximum capacity of 25 tons of raw wheat per hour, including:
 - (1) Four (4) enclosed bucket elevators;
 - (2) Enclosed conveyors;
 - (3) Enclosed pneumatic conveying;
 - (4) Impact Machine(s);
 - (5) Stock hopper(s);
 - (6) Break roll(s);
 - (7) Hammer mill(s).
 - (8) Pin mill(s);
 - (9) Bran finisher(s);
 - (10) Plan sifter(s), controlling particulate emissions with two (2) baghouses, identified as Filter #07 and Filter #08, and exhausting to stacks S7 and S8;
 - (11) Purifier(s), controlling particulate emissions with one (1) baghouse, identified as Filter #09, and exhausting to stack S9; and
 - (12) High efficiency cyclone collectors.
- (d) Finished Product, Byproduct, & Mill Feed Handling, Storage, Loadout, and Shipping, approved in 2014 for construction, with a bottlenecked throughput capacity of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year:
 - (1) Finished product handling & storage, identified as emission unit AUMF-60629, including:
 - (A) Enclosed pneumatic conveying;
 - (B) Enclosed headhouse distribution system, identified as Total Receiver - High Ash Flour Line,
 - (C) Eight (8) airlock hoppers;
 - (D) One (1) micro ingredients system;
 - (E) One (1) flour blending system, including:
 - (i) Enclosed headhouse distribution system;
 - (ii) Five (5) blender/mixer/agitators;

- (iii) One (1) totally enclosed chlorine gas flour bleaching system:
 - (AA) Fourteen (14), 114 gallon, pressurized chlorine storage tanks, one (1) ton, each, for a total maximum storage capacity of 1,596 gallons or fourteen (14) tons;
 - (BB) Chlorine gas lines;
- (iv) Enclosed pneumatic conveying;
- (F) One (1) 10 ton intermediate storage bin, identified as Start-up Bin, controlling particulate emissions with one (1) baghouse, identified as #20;
- (G) Twelve (12) finished product storage bins (one of the bins is divided into two), with a total [combined] storage capacity of 1,440 tons of flour, controlling particulate emissions with twelve (12) baghouses, identified as #21, #22, #23, #24, #25, #26, #27, #28, #28, #29, #30, #31, and exhausting inside the building.
- (2) Bulk Plant and Finished Product Loadout, identified as emission unit AUMF-60775, and including:
 - (A) Enclosed pneumatic conveying;
 - (B) Enclosed headhouse distribution system, identified as Total Receiver, controlling particulate emissions with one (1) baghouse, identified as Filter #10, and exhausting to Stack S10;
 - (D) Four (4) storage bins for bulk flour load out, with a total storage capacity 810 tons, controlling particulate emissions with four (4) baghouses, identified as Filter #39, Filter #40, Filter #41, and Filter #42, and exhausting inside the building;
 - (G) One (1) storage bin for rail load out, with a total storage capacity 100 tons; and
 - (H) The bulk plant bagging operation and enclosed loadout area for bulk shipment via trucks and railcars, including:
 - (i) Enclosed pneumatic conveying, controlling particulate emissions with two (2) baghouses, identified as Filter #34 and Filter #35, exhausting inside the building;
 - (ii) Two (2) storage bins for packing flour, with a total storage capacity of 20 tons, controlling particulate emissions with two (2) baghouses, identified as Filter #36 and Filter #37, and exhausting inside the building;
 - (iii) One (1) storage bin packing food grade bran, with a total storage capacity 6 tons;
 - (iv) Sifters, controlling particulate emissions with two (2) baghouses, identified as Filter #32 and Filter #33, and exhausting inside the building;
 - (v) Scales;
 - (vi) Sewing machine(s);
 - (vii) Bagging station(s);

- (viii) Belt conveyors;
 - (ix) Metal detector(s);
 - (x) Label printer(s); and
 - (xi) Pallet wrapping station(s).
- (3) Byproducts and Mill Feed Storage, Handling, and Loadout, identified as emission unit AUMF-60778, and including:
 - (A) Byproducts and Mill Feed Storage, and Handling, controlling particulate emissions with one (1) baghouse, identified as Filter #12, exhausting to stack S12, and including:
 - (i) One (1) enclosed bucket elevator;
 - (ii) Four (4) conveyors;
 - (iii) Enclosed pneumatic conveying;
 - (iv) One (1) storage bin for food grade bran, with a total storage capacity of 60 tons;
 - (v) Three (3) storage bins for Mill Feed, with a total storage capacity of 180 tons and
 - (vi) Two (2) storage bins for screenings, with a total storage capacity of 38 tons; and
 - (B) One (1) storage bin for Red Dog, with a total storage capacity of 60 tons, controlling particulate emissions with one (1) baghouse, identified as Filter #43, and exhausting inside the building;
 - (C) Enclosed loadout area for bulk shipment via trucks and railcars, controlling particulate emissions with four (4) baghouses, identified as Filter #13, Filter #14, Filter #15, and Filter #16, and exhausting to stacks S13, S14, S15, and S16, and including:
 - (i) One (1) enclosed bucket elevator.
 - (ii) One (1) storage bin for food grade bran, with a total storage capacity of 60 tons;
 - (iii) Two (2) conveyors;
 - (iv) Enclosed pneumatic conveying; and
 - (v) Bagging operations;
 - (AA) Sewing machine(s);
 - (BB) Bagging station(s); and
 - (CC) Weighing scale(s).

(e) Insignificant activities consisting of the following:

- (1) Paved roads with limited public access [326 IAC 6-4, 326 IAC 6.5]
- (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (3) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (4) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (5) Cleaners and solvents characterized as follows:
 - (A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 °C (100 °F) or;
 - (B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 °C (68 °F); the use of which for all cleaners and solvents combined does not exceed one hundred forty-five (145) gallons per twelve (12) months;
- (6) Portable containers used for the collection, storage, or disposal of materials provided the container capacity is equal to or less than forty-six hundredths (0.46) cubic meters (121.5 gallons) and the container is closed, except when the material is added or removed;
- (7) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment; and
- (8) Closed loop heating and cooling systems.

Unpermitted Emission Units and Pollution Control Equipment

No unpermitted emission units were discovered operating at the source during this review process.

“Integral Part of the Process” Determination

Whitewater Mill, LLC will utilize cyclones and baghouses within the process. Whitewater Mill, LLC considers the cyclones as process equipment (i.e., integral to the process) and has submitted information to justify why the baghouses should be considered an integral part of the wheat mill process. The justifications submitted by the applicant and IDEM, OAQ's determinations are summarized below.

Cyclones

Whitewater Mill Justification

Whitewater Mill, LLC will use a number of high efficiency cyclones throughout the mill to collect raw material, finished product, or secondary product (byproduct). Each cyclone will be exclusively used for raw material, finished product, or byproduct recovery and each cyclone will be connected to a baghouse for particulate control. Each cyclone should be considered process equipment (i.e., integral to the process) for the purposes of the air permit.

IDEM, OAQ Determination

IDEM, OAQ has evaluated the information submitted by the applicant and agrees that for the purposes of this air permit each cyclone will be considered process equipment (i.e., integral to the process) since each cyclone will be exclusively used for raw material, finished product, or byproduct recovery and each cyclone will be connected to a baghouse for particulate control. Therefore, the potential particulate emissions from the mill process were calculated after consideration of the

cyclones for purposes of determining permitting level and 326 IAC 6.5, applicability. However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD), potential particulate emissions from the mill process were calculated before consideration of the cyclones. Operating conditions in the proposed permit will specify that the cyclones shall operate at all times when the mill process is in operation.

Baghouses

Whitewater Mill Justification

Whitewater Mill, LLC has submitted the following information to justify why the thirty-nine (39) baghouses, identified as Filter #1, #2, #3, #5, #6, #7, #8, #9, #10, #12, #13, #14, #15, #16, #17, #18, #19, #20, #21, #22, #23, #24, #25, #26, #27, #28, #29, #30, #31, #33, #34, #35, #36, #37, #39, #40, #41, and #43, should be considered an integral part of the proposed wheat mill:

(a) The process cannot operate without the control equipment:

- (1) Filter systems are core elements in grain mills. They fulfill wide variety of functions:
 - (A) Prevention of dust generation.
 - (B) Prevention of dust escaping from machinery and plant components,
 - (C) Used for cleaning impurities in the wheat like dust, husk, and chaff thru aspirators.
 - (D) Cooling or drying of product moisture.
 - (E) If filter system is not running product flow would be restricted, lines would plug up, and moisture would build up inside spouting and machines, which would be a sanitation issue.
 - (F) Wheat will not be cleaned, which would be food safety issue.
 - (G) Reduction of cleaning requirements.
 - (H) Improved working conditions.
 - (I) Reduction of dust explosion risk.
- (2) Aspiration systems are core element in grain mills and all ducting must go to the heart of the system which is the filter. They fulfill a very wide variety of functions.
 - (A) Prevention of dust generation;
 - (B) Prevention of dust escaping from machinery/plant components (healthy work environment);
 - (C) Process functions which are crucial for some of the equipment like aspirators/grain gravity separators/grain de-stoner. Negative pressure required, otherwise these machines will not work;
 - (D) Aspiration of leakage air of pneumatic conveying system and airlocks. For example, filter on airlock hopper removes false air generated by airlock and separates product which goes back in to stream. No product loss.

(b) The control equipment serves a primary purpose other than pollution control:

The filters are described as follows, separated into "6 groups" having the same purpose, and using the numbering from the spread sheet (*included as Attachment B of this TSD*).

(1) **Filters #01, #02, #05, #06, #09, #35 – process filters**

These filters are process filters for a system where various machines are connected to. These machines need a certain negative pressure be able to run and any major dust accumulation inside this machines will affect the way they work like plugged up sieves. End-target of a system is the filter where product is recovered and feedback with no loss.

(2) **Filter #03 – conveyor mounted filters**

Located directly on top of a chain conveyor. Conveyors must have aspiration, and since this unit is too far away from any of the process systems a filter is the only choice to be used. Filter product must go back in to the same conveyor to be accounted for.

(3) **Filters #07-08, #21, #34 – mill pneumatic filters**

2x filters are part of the mill pneumatic suction conveying line system. It is cooling down the product ground on the roller mills, and lowers the risk of condensation.

(4) **Filter #10, #20, #26 – total receiver filters**

Located at the end of a pressure conveying line and acts as a receiver separating the air product mixture and avoiding losses. No product loss is the key using a filter receiver.

(5) **Filters #12-19, #29-31, #36-41, #43 – bin top filters**

Typical bin top filter needed to remove dust and reduce risk of condensation inside top of the bins. Bins are fed by pressure conveying lines which heat up air/product mix during conveying and as well from the air producer called blower. Filter product goes back in to bin to avoid any loss and cross contamination.

(6) **Filters #22-25, #27-28, #33, – airlock hopper filters**

Typical airlock inlet hopper filter where the product is fed in to the pressure conveying line. Filters are a must to remove the false air generated from the airlock and return the accumulated filter product back in to the line.

(c) The control equipment has an overwhelming positive net economic effect:

The Whitewater Mill is designed to receive and process a maximum bottlenecked throughput of 438,000,000 pounds (219,000 tons) of raw materials (wheat) per year and produce a maximum of 219,000 tons of product per year. Based on the information contained in Appendix B: Cost Benefit Analysis, the annual purchase cost of raw materials will be \$3,504,000.00 per year, the annual value of finished products produced will be \$10,711,956.31 per year, and the annual value of byproducts produced will be \$16,206,004.08 per year, for a combined total of \$26,917,960.39 per year (See the Cost/Benefit Analysis table, page 1 of 5, Appendix B: Cost Benefit Analysis). The estimated economic benefit of recovering material from each baghouse is as follows:

Baghouse/ Filter ID	Projected Annual Savings (\$)
Filter #01	-8,149.80
Filter #02	-14,689.80
Filter #03	-1,047.30
Filter #05	-7,514.80
Filter #06	-3,286.50
Filter #07	13,985.00
Filter #08	13,985.00
Filter #09	42,485.00
Filter #10	45,590.00
Filter #12	3,251.00
Filter #13	796.50
Filter #14	796.50
Filter #15	796.50
Filter #16	796.50
Filter #17	-734.74
Filter #18	-1,121.50
Filter #19	-736.50
Filter #20	747.39
Filter #21	887.39

Baghouse/ Filter ID	Projected Annual Savings (\$)
Filter #22	1,547.39
Filter #23	1,547.39
Filter #24	1,547.39
Filter #25	1,547.39
Filter #26	1,377.39
Filter #27	1,547.39
Filter #28	1,547.39
Filter #29	927.39
Filter #30	1,147.39
Filter #31	927.39
Filter #33	1,547.39
Filter #34	417.39
Filter #35	677.39
Filter #36	117.39
Filter #37	117.39
Filter #39	117.39
Filter #40	117.39
Filter #41	117.39
Filter #43	-181.00

See Appendix B: Cost Benefit Analysis for a detailed analysis of each filter.

IDEM, OAQ Determination

IDEM, OAQ has evaluated the information submitted by the applicant, and has determined that although each baghouse performs some process related function, such as contributing to product collection and conveyance, cooling product, minimizing condensation, assisting with proper system operation, etc..., the primary function of each baghouse will be dust (particulate air pollution) control. The baghouses (filters) will be installed primarily to reduce airborne dust, to meet OSHA standards for combustible dust and indoor air quality, and to reduce the need for housekeeping and maintenance. In some cases, the baghouses will cost more to install and maintain than the financial benefit gained from their operation (See table above and Appendix B: Cost Benefit Analysis). In other cases, where the baghouses contribute to product conveyance and/or collection, each baghouse will capture at most 0.10% of the finished product or secondary products for the associated process unit, resulting in a financial benefit of not more than \$45,590.00 as indicated in the table above and Appendix B: Cost Benefit Analysis. In these cases, there will be a positive net economic benefit to utilizing these baghouses for product/byproduct recovery; however, compared to the projected total annual value of products and byproducts produced/sold of \$26,917,960.39 per year, each baghouse would not provide an overwhelming positive net economic effect. Finally, IDEM, OAQ has determined that in each case, the associated process could continue to operate if the filters were not in place or not properly installed or maintained.

Therefore, the permitting level will be determined using the potential to emit before each of the thirty-nine (39) baghouses, identified as Filter #1, #2, #3, #5, #6, #7, #8, #9, #10, #12, #13, #14, #15, #16, #17, #18, #19, #20, #21, #22, #23, #24, #25, #26, #27, #28, #29, #30, #31, #33, #34, #35, #36, #37, #39, #40, #41, and #43.

Process Bottleneck

According to Buhler Inc., the engineering firm contracted to design this new stationary wheat [flour] mill, this facility is specifically designed to process a maximum of 12,700 cwt (centum weight) (equivalent to 711.20 tons [short]) of raw whole wheat per day. The wheat milling operation, contained in the Mill House, is the limiting factor for this facility and acts as an "operational bottleneck", since the source will only

receive (on an annual average) as much raw material as can be processed in the mill and can only ship as much finished product (wheat flour) and related byproducts as can be produced;

Therefore, the potential to emit for the whole grain receiving, handling, pre-cleaning, and storage, identified as AUMF-60787, the cleaning house, identified as AUMF-60770, the finished product handling & storage, identified as AUMF-60629, the bulk plant and finished product loadout, identified as AUMF-60775, and the byproducts and mill feed storage, handling, and loadout, identified as AUMF-60778, was calculated based on the bottleneck throughput of 219,000 tons of finished product (wheat flour), byproducts, and/or mill feed per year, combined, from the Mill House.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Additionally, the following applies:

- (a) The potential to emit (PTE) is based on rated capacity at 8,760 hours/year, except where otherwise noted.
- (b) The potential to emit from this new source is calculated based on the control device (baghouse) specifications, where applicable:
 - (1) Based on documentation submitted by the source for the baghouses, Bühler, the company designing and manufacturing the mill, certifies the following:
 - (A) An inlet grain loading of 3 to 15 grains/ft³, and a worst case total outlet grain loading emission rate of 0.0044 grains/ft³ for flour mill particles. PM10 emissions represent 62% of the PM emissions.
 - (B) A capture/control efficiency of 99.9%; and
 - (2) IDEM has assumed that PM10 emissions (after control) represent approximately 62% of total PM emissions (after control).
 - (3) The "Gas or Air Flow Rate" was provided by the source as cubic meters per minute (m³/min). For the purposes of the emissions calculations, this has been converted to cubic feet per minute (ft³/min) using the AP 42 - Appendix A constant: 1 cubic meter/minute (m³/min) = 35.315 cubic feet per minute (ft³/min);
 - (4) Emission Factors use to calculate the potential to emit from the storage silo bin vent filters are from AP 42, Chapter 9.9.1 Grain Elevators and Processes, Table 9.9.1-1 Particulate Emission Factors for Grain Elevators and Table 9.9.1-2 Particulate Emission Factors for Grain Processing Facilities (4/2003); and
 - (5) Emission Factors use to calculate the potential to emit from the paved roads are from AP 42, Chapter 13.2.1 Paved Roads (1/2011).
- (c) The whole grain receiving area is enclosed within a four (4) sided concrete enclosure having two (2) 12' x 14' openings for truck entrance/exit. Therefore, IDEM has determined that particulate emissions from this activity could reasonably be ducted to a control device. Additionally, it is reasonable that bin vent filters could be installed on each of the whole grain storage silos. Consequently, these emissions are not considered fugitive in nature.

- (d) The potential particulate emissions (PTE) from the mill process were calculated after consideration of the cyclones for purposes of determining operating permit level and 326 IAC 6.5, applicability. However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD), potential particulate emissions from the mill process were calculated before consideration of the cyclones. *(See the "Integral Part of the Process Determination" section, above, for further clarification).*
- (e) The chlorine gas flour bleaching system will be totally/completely enclosed. The chlorine gas will be introduced into the process through the blenders/mixers/agitators. The amount of chlorine gas added to the process (approx. 2 oz. per 100 lbs of flour) will only be what is needed to produce a specific color and pH in the flour. The process is specifically designed to consume more than 99.99% of the gas, with negligible emissions. Therefore, more than 99.99% of what is added will be absorbed and will react with the flour.

Assuming that 0.01% of the chlorine does not react with the flour and is emitted to the atmosphere, the potential to emit (PTE) chlorine (a hazardous air pollutant (HAP)) would be negligible (i. e., 9.20E^{-05} tons/yr).

Since negligible amounts of chlorine gas will be emitted from the process, capture or treatment will not be required. The gas will be stored in pressurized tanks within a "chlorine building". Each tank will provide at max 1 ton (114 gallons) of storage. Process equipment includes fourteen (14), one (1) ton chlorine storage tanks (total maximum storage capacity fourteen (14) tons or 1,596 gallons), chlorine gas lines, pneumatic "blow" lines for conveying the flour, a distributor, and 5 agitators to mix the flour.

- (f) The bulk plant and finished product loadout and the byproducts and mill feed loadout systems are enclosed within a two (2) sided shed-like enclosure having two (2) 60' x 30' openings for truck/rail entrance/exit. Therefore, IDEM has determined that particulate emissions from these activities could reasonably be ducted to a control device. Consequently, these emissions are not considered fugitive in nature.
- (f) PM 2.5 emissions are assumed equal to PM10 emissions.

Permit Level Determination – FESOP

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

Pollutant	Potential To Emit (tons/year)
PM	21,338
PM10 ⁽¹⁾	13,205
PM2.5 ⁽¹⁾	13,188
SO ₂	0
NO _x	0
VOC	0
CO	0
GHGs as CO ₂ e	0
TOTAL HAPs	9.20E ⁻⁰⁵
"Worst" Single HAP	9.20E ⁻⁰⁵ (chlorine)
N/A = not applicable.	
(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".	

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of PM10 and PM2.5 are each greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued (*a New Source Construction Permit (326 IAC 2-5.1-3) and*) a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year.

PTE of the Entire Source After Issuance of the FESOP

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)									
	PM	PM10*	PM2.5*	SO2	NOx	VOC	CO	GHGs as CO2e***	Total HAPs ⁽¹⁾	Worst Single HAP ⁽¹⁾
Whole Grain Receiving, Pre-cleaning, Handling** (AUMF-60787)	39.14	24.27	24.27	0	0	0	0	0	0	NA
Whole Grain Storage - Bin Vents ⁽¹⁾ (AUMF-60787)	53.66	13.52	2.36	0	0	0	0	0	0	NA
Cleaning House** (AUMF-60770)	22.71	14.08	14.08	0	0	0	0	0	0	NA
Mill House** (AUMF-60769)	37.11	23.01	23.01	0	0	0	0	0	0	NA
Finished Product Handling** (AUMF-60629)	8.11	5.03	5.03	0	0	0	0	0	9.20E ⁻⁰⁵	9.20E ⁻⁰⁵ (chlorine)
Finished Product Storage & Loadout** (AUMF-60775)	24.61	12.60	9.96	0	0	0	0	0	0	NA
Byproducts & Mill feed storage, handling and loadout** (AUMF 60778)	21.47	10.65	8.01	0	0	0	0	0	0	NA
Total PTE of Entire Source	206.81	103.15	86.71	0	0	0	0	0	0	NA
Title V Major Source Thresholds***	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds***	250	250	250	250	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fugitive Emissions (Paved Roads)****	6.87	1.37	0.34	0	0	0	0	0	0	NA
negl. = negligible NA = Not Applicable. * 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". ** Limited PTE based upon a pound per hour emission limit to render the requirements of 326 IAC 2-2 (PSD) not applicable. ** Limited PTE based upon a pound per hour emission limit to comply with 326 IAC 2-8 (FESOP). *** The 100,000 CO2e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD. **** Fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability. See the "Fugitive Emissions" section, of this TSD, above for more detail. (1) Unlimited/Uncontrolled emissions										

PSD Minor, Emission Offset Minor, and FESOP Status

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

This new source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this

new source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

- (a) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, PM emissions (after control) from each of the following emission units shall not exceed the limits specified in the table below:

Emissions Unit Description (Unit ID)	Process	Baghouse or Filter #	PM Limitation (lbs/hr)
Whole Grain Receiving, Pre-cleaning, & Handling (AUMF-60787)	Wheat Intake	01	4.66
	Pre-Cleaning	02	3.95
	Silo Chain Conveyor	03	0.33
Cleaning House (AUMF-60770)	Cleaning	05	4.16
	Screenings	06	0.68
	Light Wheat Bin	17	0.05
	Unground Screenings Bin	18	0.25
	Ground Screenings Bin	19	0.05
Mill House (AUMF-60769)	Mill - Pneumatic	07	3.00
	Mill - Pneumatic	08	3.00
	Mill - Aspiration	09	2.48
Finished Product Handling (AUMF-60629)	Total Receiver High Ash Flour Line	20	0.05
	Start Up Bin	21	0.49
	Airlock Hopper Clear Flour	22	0.06
	Airlock Hopper Cake Flour	23	0.06
	Airlock Hopper Patent Flour	24	0.06
	Airlock Hopper Whole Wheat Flour	25	0.06
	Total Receiver High Ash Flour	26	0.03
	Airlock Hopper Flour To Packing	27	0.09
	Airlock Hopper Flour To Packing	28	0.09
	Whole Wheat Bin	29	0.37
	High Ash Bin	30	0.11
	Cake Flour Bin	31	0.37
Finished Product Loadout (AUMF-60775)	Total Receiver	10	0.48
	Flour Line Sifter To Load Out Bins	33	0.06
	Total Receiver Vacuum System	34	0.25
	Packer Aspiration Filter	35	0.18
	Patent Packing Bin	36	0.50
	Patent Packing Bin	37	0.50
	Outload Bin	39	0.50
	Outload Bin	40	0.50
	Outload Bin	41	0.50
Byproducts & Mill Feed Handling, Storage, & Loadout (AUMF 60778)	Bran Bins	12	1.39
	Mill Feed Outload Bin	13	0.30
	Mill Feed Outload Bin	14	0.30
	Mill Feed Outload Bin	15	0.30
	Mill Feed Outload Bin	16	0.30
	RED DOG Bin	43	0.16

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

- (b) In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, PM10 and PM2.5 emissions (after control) from each of the following emission units shall not exceed the limits specified in the table below:

Emissions Unit Description (Unit ID)	Process	Baghouse or Filter #	PM10 Limitation (lbs/hr)	PM2.5 Limitation (lbs/hr)
Whole Grain Receiving / Pre-cleaning / Handling (AUMF-60787)	Wheat Intake	01	2.89	2.89
	Pre-Cleaning	02	2.45	2.45
	Silo Chain Conveyor	03	0.20	0.20
Cleaning House (AUMF-60770)	Cleaning	05	2.58	2.58
	Screenings	06	0.42	0.42
	Light Wheat Bin	17	0.03	0.03
	Unground Screenings Bin	18	0.15	0.15
	Ground Screenings Bin	19	0.03	0.03
Mill House (AUMF-60769)	Mill - Pneumatic	07	1.86	1.86
	Mill - Pneumatic	08	1.86	1.86
	Mill - Aspiration	09	1.54	1.54
Finished Product Handling (AUMF-60629)	Total Receiver High Ash Flour Line	20	0.03	0.03
	Start Up Bin	21	0.30	0.30
	Airlock Hopper Clear Flour	22	0.04	0.04
	Airlock Hopper Cake Flour	23	0.04	0.04
	Airlock Hopper Patent Flour	24	0.04	0.04
	Airlock Hopper Whole Wheat Flour	25	0.04	0.04
	Total Receiver High Ash Flour	26	0.02	0.02
	Airlock Hopper Flour To Packing	27	0.06	0.06
	Airlock Hopper Flour To Packing	28	0.06	0.06
	Whole Wheat Bin	29	0.23	0.23
	High Ash Bin	30	0.07	0.07
	Cake Flour Bin	31	0.23	0.23
Finished Product Loadout (AUMF-60775)	Total Receiver	10	0.30	0.30
	Flour Line Sifter To Load Out Bins	33	0.04	0.04
	Total Receiver Vacuum System	34	0.15	0.15
	Packer Aspiration Filter	35	0.11	0.11
	Patent Packing Bin	36	0.31	0.31
	Patent Packing Bin	37	0.31	0.31
	Outload Bin	39	0.31	0.31
	Outload Bin	40	0.31	0.31
Byproducts & Mill Feed Storage, Handling & Loadout (AUMF 60778)	Outload Bin	41	0.31	0.31
	Bran Bins	12	0.86	0.86
	Mill Feed Outload Bin	13	0.19	0.19
	Mill Feed Outload Bin	14	0.19	0.19
	Mill Feed Outload Bin	15	0.19	0.19
	Mill Feed Outload Bin	16	0.19	0.19
	RED DOG Bin	43	0.10	0.10

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

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) 40 CFR 60, Subpart DD - Standards of Performance for Grain Elevators
The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60, Subpart DD (326 IAC 12), are not included in the permit, since although this source will include truck loading and unloading stations, railcar loading station and unloading stations, and grain handling and storage operations, activities consistent with a "grain elevator" as defined under 40 CFR 60.301(b), the "permanent storage capacity" of this source is 960,000 bushels, which is less than the rule applicability threshold of 1 million bushels. Therefore, the source is not considered a "grain terminal elevator", as defined under 40 CFR 60.301(c), or a "grain storage elevator", as defined under 40 CFR 60.301(f).
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) 40 CFR 63, Subpart DDDDDDD - NESHAPs for Area Sources: Prepared Feeds Manufacturing
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Sources: Prepared Feeds Manufacturing, 40 CFR 63, Subpart DDDDDDD (7D), are not included in the permit, since this source will be a wheat milling facility, producing wheat flour and related byproducts, and not a prepared feeds manufacturing facility, as defined under 40 CFR 63.11627.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (e) 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

- (a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the "PTE of the Entire Source After Issuance of the FESOP" section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the "PTE of the Entire Source After Issuance of the FESOP" section above.
- (c) 326 IAC 1-6-3 (Preventive Maintenance Plan)
Any person responsible for operating any facility required to obtain a permit under the Federally Enforceable State Operating Permit Program, 326 IAC 2-8, shall prepare and maintain a preventive maintenance plan, in accordance with 326 IAC 1-6-3(a), Preventive maintenance plans shall be submitted to the commissioner upon request and shall be subject to review and approval by the commissioner.
- (d) 326 IAC 1-7 (Stack Height)
This source has potential particulate matter emissions greater than twenty-five (25) tons per year. Therefore, pursuant to 326 IAC 1-7-1(1), this source is subject to the requirements of 326 IAC 1-7. Additionally, pursuant to 326 IAC 1-7-3 (Actual stack height provisions), all exhaust gas stacks shall be constructed using good engineering practices (GEP), as outlined in the rule.

- (e) 326 IAC 2-1.1-5 (Nonattainment New Source Review)
Dearborn County, Harrison Township, has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply, and are not included in the permit.
- (f) 326 IAC 2-3 (Emission Offset)
Dearborn County, Harrison Township, has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) do not apply, and are not included in the permit.
- (g) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the entire source is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- See the "Emission Calculations" and "Permit Level Determination – FESOP" sections, above, and Appendix A to this TSD for more details.*
- (h) 326 IAC 2-6 (Emission Reporting)
This source 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, pursuant to 326 IAC 2-6-1(b), the source is only subject to additional information requests as provided in 326 IAC 2-6-5.
- (i) 326 IAC 5-1 (Opacity Limitations)
This source will be constructed in Dearborn County, Harrison Township. Therefore, 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.
- (j) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
None of the emission units at this source are subject to the requirements of 326 IAC 6-3, pursuant to 326 IAC 6-3-1(c), because each is subject to the more stringent requirements of 326 IAC 6.5.
- (k) 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.
- (l) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, since the potential fugitive particulate emissions are less than 25 tons per year. See the "Fugitive Emissions" section above for more detail.
- (m) 326 IAC 6.5 (PM Limitations Except Lake County)
This source is located in Dearborn County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and potential particulate matter emissions are greater than 10 tons per year. Therefore, pursuant to 326 IAC 6.5-1-1(a)(2) and 326 IAC 6.5-1-2(a), this source is subject to the requirements of 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), as follows:

- (1) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from each of the emission units at this source shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)); and
- (2) Pursuant to 326 IAC 6.5-1-2(d)(2), the following shall apply to the whole grain receiving, handling, pre-cleaning, and storage operations, collectively identified as emission unit AUMF-60787:
 - (A) All grain elevators subject to this article shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:
 - (i) Housekeeping practices shall be conducted as follows:
 - (AA) Areas to be swept and maintained shall include, at a minimum, the following:
 - (aa) General grounds, yard, and other open areas.
 - (bb) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.
 - (cc) Grain driers with respect to accumulated particulate matter.
 - (BB) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
 - (CC) Dust from driveways, access roads, and other areas of travel shall be controlled.
 - (DD) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.
 - (ii) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
 - (AA) Malfunctions.
 - (BB) Breakdowns.
 - (CC) Improper adjustment.
 - (DD) Operating above the rated or designed capacity.
 - (EE) Not following designed operating specifications.
 - (FF) Lack of good preventive maintenance care.
 - (GG) Lack of critical and proper spare replacement parts on hand.
 - (HH) Lack of properly trained and experienced personnel.

- (iii) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined under 326 IAC 5-1.
- (n) 326 IAC 8 (Volatile Organic Compound Rules)
There are no 326 IAC 8 Rules applicable to any of the emission units at this source.
- (p) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (p) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring and Testing Requirements
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Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

Compliance Determination Requirements

The compliance determination requirements applicable to this source are as follows:

- (1) Each of the baghouses, identified as Filters #01, #02, and #03, controlling particulate emissions from the Receiving, Pre-Cleaning, & Handling (AUMF-60787), shall be in operation and control emissions from the wheat intake, pre-cleaning, and silo chain conveyor at all times when the wheat intake, pre-cleaning, and silo chain conveyor are in operation.
- (2) Each of the baghouses, identified as Filters #05, #06, #17, #18, and #19, controlling particulate emissions from the Cleaning House (AUMF-60770), shall be in operation and control emissions from the cleaning, screenings, light wheat bin, unground screenings bin, and ground screenings bin at all times when the cleaning, screenings, light wheat bin, unground screenings bin, and ground screenings bin are in operation.
- (3) Each of the baghouses, identified as Filters #07, #08, and #09, controlling particulate emissions from the Mill House (AUMF-60769), shall be in operation and control emissions from the Mill - pneumatic and Mill - aspiration at all times when the Mill - pneumatic and Mill - aspiration are in operation.
- (4) Each of the baghouses, identified as Filters #20, #21, #22, #23, #24, #25, #26, #27, #28, #29, #30, and #31, controlling particulate emissions from the Finished Product Handling (AUMF-60629), shall be in operation and control emissions from the total receiver high ash flour line, start up bin, airlock hopper clear flour, airlock hopper cake flour, airlock hopper patent flour, airlock hopper whole wheat flour, total receiver high ash flour, airlock hopper flour to packing, airlock hopper flour to packing, whole wheat bin, high ash bin,

and cake flour bin at all times when the total receiver high ash flour line, start up bin, airlock hopper clear flour, airlock hopper cake flour, airlock hopper patent flour, airlock hopper whole wheat flour, total receiver high ash flour, airlock hopper flour to packing, airlock hopper flour to packing, whole wheat bin, high ash bin, and cake flour bin are in operation.

- (5) Each of the baghouses, identified as Filters #10, #33, #34, #35, #36, #37, #39, #40, and #41, controlling particulate emissions from the Finished Product Loadout (AUMF-60775), shall be in operation and control emissions from the total receiver, flour line sifter to load out bins, total receiver vacuum system, packer aspiration filter, patent packing bin, patent packing bin, outload bin, outload bin, outload bin at all times when the total receiver, flour line sifter to load out bins, total receiver vacuum system, packer aspiration filter, patent packing bin, patent packing bin, outload bin, outload bin, outload bin are in operation.
- (6) Each of the baghouses, identified as Filters #12, #13, #14, #15, #16, and #43, controlling particulate emissions from the Byproducts & Mill Feed, Handling, Storage, & Loadout, (AUMF 60778), shall be in operation and control emissions from the bran bins, mill feed outload, mill feed outload, mill feed outload, mill feed outload, red dog bin at all times when the bran bins, mill feed outload, mill feed outload, mill feed outload, mill feed outload, red dog bin are in operation.

Testing Requirements

The testing requirements applicable to this source are as follows:

Testing Requirements					
Emission Unit	Process	Control ID / Stack ID	Pollutant	Timeframe for Testing	Frequency of Testing
Receiving, Pre-cleaning, & Handling (AUMF-60787)	Wheat Intake	Filter #01 / S1	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
	Pre-cleaning	Filter #02 / S2	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
	Silo chain conveyor	Filter #03 / S3	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
Cleaning House (AUMF-60770)	Cleaning	Filter #05 / S5	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
	Screenings	Filter #06 / S6	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
Mill House (AUMF-60769)	Mill - pneumatic	Filter #07 / S7	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
	Mill - pneumatic	Filter #08 / S8	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
	Mill - aspiration	Filter #09 / S9	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
Finished Product Handling (AUMF-60629)	Start Up Bin	Filter #21 / vents inside	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
	Whole Wheat Bin	Filter #29 / vents inside	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
	Cake Flour Bin	Filter #31 / vents inside	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
Finished Product Storage (AUMF-60775)	Total Receiver	Filter #10 / S10	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
	Patent packing bin	Filter #36 / vents inside	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
	Patent packing bin	Filter #37 / vents inside	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
	Outload Bin	Filter #39 / vents inside	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
	Outload Bin	Filter #40 / vents inside	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years

Testing Requirements					
Emission Unit	Process	Control ID / Stack ID	Pollutant	Timeframe for Testing	Frequency of Testing
	Outload Bin	Filter #41 / vents inside	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
Byproducts & Mill Feed Handling, & Storage, (AUMF 60778)	Bran Bins	Filter #12 / S12	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
	Mill Feed Outload Bin	Filter #13 / S13	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
	Mill Feed Outload Bin	Filter #14 / S14	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
	Mill Feed Outload Bin	Filter #15 / S15	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
	Mill Feed Outload Bin	Filter #16 / S16	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years
	Mill Feed Outload Bin	Filter #16 / S16	PM/PM10/PM2.5	Not later than 180 days after issuance of this FESOP	Once every five (5) years

Post-baghouse testing is required to demonstrate compliance with 326 IAC 2-8 (FESOP) and 326 IAC 6.5 (PM Limitations Except Lake County), and the limits that render 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (PSD), not applicable.

Compliance Monitoring Requirements

The compliance monitoring requirements applicable to this source are as follows:

Emission Unit	Process (Control)	Control ID / Stack ID	Operating Parameters	Frequency	Range	Excursions and Exceedances
Receiving, Pre-cleaning, & Handling (AUMF-60787)	Wheat Intake	Filter #01 / S1	Visible Emission Notations	Once per day	Normal / Abnormal	Response Steps
	Pre-cleaning	Filter #02 / S2	Visible Emission Notations	Once per day	Normal / Abnormal	Response Steps
	Silo chain conveyor	Filter #03 / S3	Visible Emission Notations	Once per day	Normal / Abnormal	Response Steps
	Conveyors, screens, & material transfer points,	n/a	Visible Emission Notations	Once per day	Normal / Abnormal	Response Steps
Cleaning House (AUMF-60770)	Cleaning	Filter #05 / S5	Visible Emission Notations	Once per day	Normal / Abnormal	Response Steps
	Screenings	Filter #06 / S6	Visible Emission Notations	Once per day	Normal / Abnormal	Response Steps
Mill House (AUMF-60769)	Mill - pneumatic	Filter #07 / S7	Visible Emission Notations	Once per day	Normal / Abnormal	Response Steps
	Mill - pneumatic	Filter #08 / S8	Visible Emission Notations	Once per day	Normal / Abnormal	Response Steps
	Mill - aspiration	Filter #09 / S9	Visible Emission Notations	Once per day	Normal / Abnormal	Response Steps
Finished Product Handling (AUMF-60629)	Start Up Bin	Filter #21 / vents inside	Pressure Drop	Once per day	3 to 5 inches	Response Steps
	Whole Wheat Bin	Filter #29 / vents inside	Pressure Drop	Once per day	3 to 5 inches	Response Steps
	Cake Flour Bin	Filter #31 / vents inside	Pressure Drop	Once per day	3 to 5 inches	Response Steps

Emission Unit	Process (Control)	Control ID / Stack ID	Operating Parameters	Frequency	Range	Excursions and Exceedances
Finished Product Loadout (AUMF-60775)	Total Receiver	Filter #10 / S10	Visible Emission Notations	Once per day	Normal / Abnormal	Response Steps
	Patent Packing Bin	Filter #36 / vents inside	Pressure Drop	Once per day	3 to 5 inches	Response Steps
	Patent Packing Bin	Filter #37 / vents inside	Pressure Drop	Once per day	3 to 5 inches	Response Steps
	Outload Bin	Filter #39 / vents inside	Pressure Drop	Once per day	3 to 5 inches	Response Steps
	Outload Bin	Filter #40 / vents inside	Pressure Drop	Once per day	3 to 5 inches	Response Steps
	Outload Bin	Filter #41 / vents inside	Pressure Drop	Once per day	3 to 5 inches	Response Steps
Byproducts & Mill Feed Handling, Storage, & Loadout (AUMF 60778)	Bran Bins	Filter #12 / S12	Visible Emission Notations	Once per day	Normal / Abnormal	Response Steps
	Mill Feed Outload Bin	Filter #13 / S13	Visible Emission Notations	Once per day	Normal / Abnormal	Response Steps
	Mill Feed Outload Bin	Filter #14 / S14	Visible Emission Notations	Once per day	Normal / Abnormal	Response Steps
	Mill Feed Outload Bin	Filter #15 / S15	Visible Emission Notations	Once per day	Normal / Abnormal	Response Steps
	Mill Feed Outload Bin	Filter #16 / S16	Visible Emission Notations	Once per day	Normal / Abnormal	Response Steps

These monitoring conditions are necessary because the baghouses used in conjunction with the Receiving, Pre-cleaning, & Handling (AUMF-60787), Cleaning House (AUMF-60770), Mill House (AUMF-60769), Finished Product Handling (AUMF-60629), Finished Product Loadout (AUMF-60775), and Byproducts & Mill Feed Handling, Storage, & Loadout (AUMF 60778), must each operate properly to ensure compliance with 326 IAC 2-8 (FESOP) and 326 IAC 6.5 (PM Limitations Except Lake County), and the limits that render 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permit Program) not applicable.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on January 09, 2014.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction FESOP No. F029-34057-00045. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Ms. Hannah Desrosiers 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) 233-9327 or toll free at 1-800-451-6027 extension 3-9327.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

Appendix A: Emissions Calculations
Entire Source Summary

Company Name: Whitewater Mill, LLC
Address City IN Zip: 707 Harrison Brookville Road,
West Harrison, Indiana 47060
Permit No.: F029-34507-00045
Reviewer: Hannah L. Desrosiers

Emission Unit Description	Unit ID	Unlimited/Uncontrolled Potential to Emit (tons/year)										
		Criteria Pollutants							Greenhouse Gas Pollutants	Hazardous Air Pollutants		
		PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Case HAP	
Ducted/Ductable Emissions												
Whole Grain Receiving, Pre-cleaning, & Handling	AUMF-60787	12,309	7,632	7,632	0	0	0	0	0	0	0	NA
Whole Grain Storage - Bin Vents	AUMF-60787	53.66	13.52	2.36	0	0	0	0	0	0	0	NA
Cleaning House	AUMF-60770	3,331	2,065	2,065	0	0	0	0	0	0	0	NA
Mill House	AUMF-60769	27,214	16,873	16,873	0	0	0	0	0	0	0	NA
Finished Product Handling	AUMF-60629	1,190	737.84	738	0	0	0	0	0	9.20E-05	9.20E-05	(chlorine)
Finished Product Storage & Loadout	AUMF-60775	2,238	1,385	1,382	0	0	0	0	0	0	0	NA
Byproducts & Mill Feed Handling, Storage, & Loadout	AUMF-60778	1,777	1,099	1,096	0	0	0	0	0	0	0	NA
Total Unlimited/Uncontrolled Ducted/Ductable Emissions ⁽¹⁾		48,112	29,805	29,788	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(chlorine)
Fugitive Emissions ⁽¹⁾												
Paved Roads		6.87	1.37	0.34	0	0	0	0	0	0	0	NA
Total Fugitive Emissions		6.87	1.37	0.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	NA

NA = Not Applicable.
Total emissions based on rated capacity at 8,760 hours/year.
(1) 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.

Emission Unit Description	Unit ID	Unlimited/Controlled Potential to Emit - After Cyclones (tons/year)										
		Criteria Pollutants							Greenhouse Gas Pollutants	Hazardous Air Pollutants		
		PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs ⁽¹⁾	Worst Case HAP ⁽¹⁾	
Ducted/Ductable Emissions												
Whole Grain Receiving, Pre-cleaning, & Handling ⁽¹⁾	AUMF-60787	12,309	7,632	7,632	0	0	0	0	0	0	0	NA
Whole Grain Storage - Bin Vents ⁽¹⁾	AUMF-60787	53.66	13.52	2.36	0	0	0	0	0	0	0	NA
Cleaning House ⁽¹⁾	AUMF-60770	3,331	2,065	2,065	0	0	0	0	0	0	0	NA
Mill House	AUMF-60769	439.52	272.50	273	0	0	0	0	0	0	0	NA
Finished Product Handling ⁽¹⁾	AUMF-60629	1,190	738	738	0	0	0	0	0	9.20E-05	9.20E-05	(chlorine)
Finished Product Storage & Loadout ⁽¹⁾	AUMF-60775	2,238	1,385	1,382	0	0	0	0	0	0	0	NA
Byproducts & Mill Feed Handling, Storage, & Loadout ⁽¹⁾	AUMF-60778	1,777	1,099	1,096	0	0	0	0	0	0	0	NA
Total Unlimited/Uncontrolled Ducted/Ductable Emissions ⁽²⁾		21,338	13,205	13,188	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(chlorine)
Fugitive Emissions ⁽²⁾												
Paved Roads ⁽¹⁾		6.87	1.37	0.34	0	0	0	0	0	0	0	NA
Total Fugitive Emissions		6.87	1.37	0.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	NA

NA = Not Applicable.
Total emissions based on rated capacity at 8,760 hours/year.
(1) Unlimited/Uncontrolled emissions
(2) 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.

Appendix A: Emissions Calculations
Entire Source Summary

Company Name: Whitewater Mill, LLC
Address City IN Zip: 707 Harrison Brookville Road,
West Harrison, Indiana 47060
Permit No.: F029-34507-00045
Reviewer: Hannah L. Desrosiers

Emission Unit Description	Unit ID	Unlimited/Controlled Potential to Emit - After Baghouses (tons/year)										
		Criteria Pollutants							Greenhouse Gas Pollutants	Hazardous Air Pollutants		
		PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs ⁽¹⁾	Worst Case HAP ⁽¹⁾	
Ducted/Ductable Emissions												
Whole Grain Receiving, Pre-cleaning, & Handling	AUMF-60787	12.31	7.63	7.63	0	0	0	0	0	0	0	NA
Whole Grain Storage - Bin Vents ⁽¹⁾	AUMF-60787	53.66	13.52	2.36	0	0	0	0	0	0	0	NA
Cleaning House	AUMF-60770	3.33	2.07	2.07	0	0	0	0	0	0	0	NA
Mill House	AUMF-60769	5.44	3.37	3.37	0	0	0	0	0	0	0	NA
Finished Product Handling	AUMF-60629	1.19	0.74	0.74	0	0	0	0	0	9.20E-05	9.20E-05	(chlorine)
Finished Product Storage & Loadout	AUMF-60775	11.65	4.56	1.92	0	0	0	0	0	0	0	NA
Byproducts & Mill Feed Handling, Storage, & Loadout	AUMF-60778	11.18	4.27	1.63	0	0	0	0	0	0	0	NA
Total Unlimited/Uncontrolled Ducted/Ductable Emissions ⁽²⁾		98.76	36.16	19.72	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(chlorine)
Fugitive Emissions ⁽²⁾												
Paved Roads ⁽¹⁾		6.87	1.37	0.34	0	0	0	0	0	0	0	NA
Total Fugitive Emissions		6.87	1.37	0.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	NA

NA = Not Applicable.
Total emissions based on rated capacity at 8,760 hours/year.
(1) Unlimited/Uncontrolled emissions
(2) 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.

Process Description	Unit ID	Limited/Controlled Potential to Emit (tons/year)										
		Criteria Pollutants							Greenhouse Gas Pollutants	Hazardous Air Pollutants		
		PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs ⁽¹⁾	Worst Case HAP ⁽¹⁾	
Ducted/Ductable Emissions												
Whole Grain Receiving, Pre-cleaning, & Handling	AUMF-60787	39.14	24.27	24.27	0	0	0	0	0	0	0	NA
Whole Grain Storage - Bin Vents ⁽¹⁾	AUMF-60787	53.66	13.52	2.36	0	0	0	0	0	0	0	NA
Cleaning House	AUMF-60770	22.71	14.08	14.08	0	0	0	0	0	0	0	NA
Mill House	AUMF-60769	37.11	23.01	23.01	0	0	0	0	0	0	0	NA
Finished Product Handling	AUMF-60629	8.11	5.03	5.03	0	0	0	0	0	9.20E-05	9.20E-05	(chlorine)
Finished Product Storage & Loadout	AUMF-60775	24.61	12.60	9.96	0	0	0	0	0	0	0	NA
Byproducts & Mill Feed Handling, Storage, & Loadout	AUMF-60778	21.47	10.65	8.01	0	0	0	0	0	0	0	NA
Total Limited/Controlled Ducted/Ductable Emissions ⁽²⁾		206.81	103.15	86.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(chlorine)
Fugitive Emissions ⁽²⁾												
Paved Roads ⁽¹⁾		6.87	1.37	0.34	0	0	0	0	0	0	0	NA
Total Fugitive Emissions		6.87	1.37	0.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	NA

NA = Not Applicable.
Total emissions based on rated capacity at 8,760 hours/year.
(1) Unlimited/Uncontrolled emissions
(2) 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.

Appendix A: Emissions Calculations
Unrestricted Potential Emissions (tons/year)
Particulate (PM/PM10/PM2.5)

Company Name: Whitewater Mill, LLC
Address City IN Zip: 707 Harrison Brookville Road, West Harrison, Indiana 47060
Permit No.: F029-34507-00045
Reviewer: Hannah L. Desrosiers

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Unit ID	Emission Unit Description	Throughput (tons/hr)	PM Emission Factor (lb/ton)	PM10 Emission Factor (lb/ton)	PM2.5 Emission Factor (lb/ton)	PM Emissions (tons/yr)	PM10 Emissions (tons/yr)	PM2.5 Emissions (tons/yr)
Ducted/Ductable Emissions								
AUMF-60787	Whole Grain Storage - Bin Vents ^(a)	490	0.025	0.0063	0.0011	53.66	13.52	2.36

Methodology

Total emissions based on rated capacity at 8,760 hours/year.

Emission Factors are from AP 42, Chapter 9.9.1 Grain Elevators And Processes, Tables 9.9.1-1. Particulate Emission Factors for Grain Elevators and 9.9.1-2. Particulate Emission Factors for Grain Processing Facilities.

(a) Total Storage = 960,000 bushels

PM/PM10/PM2.5 Emissions (tons/yr) = Throughput (tons/hr) x Emission Factor (lb/ton) * 8760 hr/yr / 2000 lb/ton

Appendix A: Emission Calculations
Unrestricted Potential Emissions (tons/year)
Particulate (PM/PM10/PM2.5)

Company Name: Whitewater Mill, LLC
Address City IN Zip: 707 Harrison Brookville Road, West Harrison, Indiana 47060
Permit No.: F029-34507-00045
Reviewer: Hannah L. Desrosiers

Emissions Unit Description (Unit ID)	Process	Cyclone Control Efficiency (%)*	Stack ID	Baghouse or Filter #	BH Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (m³/m.)	Gas or Air Flow Rate (ft³/m.)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)	PM10 Emission Rate after Controls (lb/hr)**	PM10 Emission Rate after Controls (tons/yr)**	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM10 Emission Rate before Controls (lb/hr)**	PM10 Emission Rate before Controls (tons/yr)**
Receiving, Pre-cleaning, & Handling (AUMF-60787)	Wheat Intake	n/a	S1	01	99.9%	0.0044	770	27,192.55	1.03	4.49	0.64	2.78	1,025.55	4,491.90	635.84	2,784.98
	Pre-cleaning	n/a	S2	02	99.9%	0.0044	1304	46,050.76	1.74	7.61	1.08	4.72	1,736.77	7,607.06	1,076.80	4,716.38
	Silo chain conveyor	n/a	S3	03	99.9%	0.0044	36	1,271.34	0.05	0.21	0.03	0.13	47.95	210.01	29.73	130.21
Cleaning House (AUMF-60770)	Cleaning	n/a	S5	05	99.9%	0.0044	458	16,174.27	0.61	2.67	0.38	1.66	610.00	2,671.80	378.20	1,656.52
	Screenings	n/a	S6	06	99.9%	0.0044	75	2,648.63	0.10	0.44	0.06	0.27	99.89	437.52	61.93	271.26
	Light Wheat Bin	n/a	n/a	17	99.9%	0.0044	6	211.89	0.01	0.04	0.00	0.02	7.99	35.00	4.95	21.70
	Ungr. Screenings Bin	n/a	n/a	18	99.9%	0.0044	27	953.51	0.04	0.16	0.02	0.10	35.96	157.51	22.30	97.66
	Ground Screenings Bin	n/a	n/a	19	99.9%	0.0044	5	176.58	0.01	0.03	0.00	0.02	6.66	29.17	4.13	18.08
Mill House (AUMF-60769)	Mill - pneumatic	80.0%	S7	07	99.9%	0.0044	330	11,653.95	0.44	1.93	0.27	1.19	2,197.60	9,625.50	1,362.51	5,967.81
	Mill - pneumatic	80.0%	S8	08	99.9%	0.0044	330	11,653.95	0.44	1.93	0.27	1.19	2,197.60	9,625.50	1,362.51	5,967.81
	Mill - aspiration	80.0%	S9	09	99.9%	0.0044	273	9,641.00	0.36	1.59	0.23	0.99	1,818.02	7,962.91	1,127.17	4,937.00
Finished Product Handling (AUMF-60629)	Total Receiver High Ash Flour Line	n/a	n/a	20	99.9%	0.0044	5	176.58	0.01	0.03	0.00	0.02	6.66	29.17	4.13	18.08
	Start Up Bin	n/a	n/a	21	99.9%	0.0044	54	1,907.01	0.07	0.32	0.04	0.20	71.92	315.02	44.59	195.31
	Airlock Hopper CLEAR Flour	n/a	n/a	22	99.9%	0.0044	7	247.21	0.01	0.04	0.01	0.03	9.32	40.84	5.78	25.32
	Airlock Hopper CAKE Flour	n/a	n/a	23	99.9%	0.0044	7	247.21	0.01	0.04	0.01	0.03	9.32	40.84	5.78	25.32
	Airlock Hopper PATENT Flour	n/a	n/a	24	99.9%	0.0044	7	247.21	0.01	0.04	0.01	0.03	9.32	40.84	5.78	25.32
	Airlock Hopper WHOLE WHEAT FL.	n/a	n/a	25	99.9%	0.0044	7	247.21	0.01	0.04	0.01	0.03	9.32	40.84	5.78	25.32
	Total Receiver HIGH ASH FL.	n/a	n/a	26	99.9%	0.0044	3	105.95	0.004	0.02	0.002	0.01	4.00	17.50	2.48	10.85
	Airlock Hopper FLOUR To Packing	n/a	n/a	27	99.9%	0.0044	10	353.15	0.01	0.06	0.01	0.04	13.32	58.34	8.26	36.17
	Airlock Hopper FLOUR To Packing	n/a	n/a	28	99.9%	0.0044	10	353.15	0.01	0.06	0.01	0.04	13.32	58.34	8.26	36.17
	WHOLE WHEAT Bin	n/a	n/a	29	99.9%	0.0044	41	1,447.92	0.05	0.24	0.03	0.15	54.61	239.18	33.86	148.29
	HIGH ASH Bin	n/a	n/a	30	99.9%	0.0044	12	423.78	0.02	0.07	0.01	0.04	15.98	70.00	9.91	43.40
	CAKE FLOUR Bin	n/a	n/a	31	99.9%	0.0044	41	1,447.92	0.05	0.24	0.03	0.15	54.61	239.18	33.86	148.29
Finished Product Storage (AUMF-60775)	Total Receiver	n/a	S10	10	99.9%	0.0044	53	1,871.70	0.07	0.31	0.04	0.19	70.59	309.18	43.77	191.69
	Flour line sifter to load out bins	n/a	n/a	33	99.9%	0.0044	7	247.21	0.01	0.04	0.01	0.03	9.32	40.84	5.78	25.32
	Total Receiver Vacuum System	n/a	n/a	34	99.9%	0.0044	27	953.51	0.04	0.16	0.02	0.10	35.96	157.51	22.30	97.66
	Packer aspiration filter	n/a	n/a	35	99.9%	0.0044	20	706.30	0.03	0.12	0.02	0.07	26.64	116.67	16.52	72.34
	PATENT packing bin	n/a	n/a	36	99.9%	0.0044	55	1,942.33	0.07	0.32	0.05	0.20	73.25	320.85	45.42	198.93
	PATENT packing bin	n/a	n/a	37	99.9%	0.0044	55	1,942.33	0.07	0.32	0.05	0.20	73.25	320.85	45.42	198.93
	OUTLOAD bin	n/a	n/a	39	99.9%	0.0044	55	1,942.33	0.07	0.32	0.05	0.20	73.25	320.85	45.42	198.93
	OUTLOAD bin	n/a	n/a	40	99.9%	0.0044	55	1,942.33	0.07	0.32	0.05	0.20	73.25	320.85	45.42	198.93
Byproducts & Mill Feed Handling & Storage (AUMF 60778)	OUTLOAD bin	n/a	n/a	41	99.9%	0.0044	55	1,942.33	0.07	0.32	0.05	0.20	73.25	320.85	45.42	198.93
	Bran bins	n/a	S12	12	99.9%	0.0044	153	5,403.20	0.20	0.89	0.13	0.55	203.78	892.55	126.34	553.38
	Mill Feed Outload	n/a	S13	13	99.9%	0.0044	33	1,165.40	0.04	0.19	0.03	0.12	43.95	192.51	27.25	119.36
	Mill Feed Outload	n/a	S14	14	99.9%	0.0044	33	1,165.40	0.04	0.19	0.03	0.12	43.95	192.51	27.25	119.36
	Mill Feed Outload	n/a	S15	15	99.9%	0.0044	33	1,165.40	0.04	0.19	0.03	0.12	43.95	192.51	27.25	119.36
	Mill Feed Outload	n/a	S16	16	99.9%	0.0044	33	1,165.40	0.04	0.19	0.03	0.12	43.95	192.51	27.25	119.36
	RED DOG bin	n/a	n/a	43	99.9%	0.0044	18	635.67	0.02	0.11	0.01	0.07	23.97	105.01	14.86	65.10
Totals:									6.00	26.27	3.72	16.29	10,968.03	48,039.98	6,800.18	29,784.79

NOTES
Total emissions based on rated capacity at 8,760 hours/year.
The emissions from this source have been calculated based on the control device specifications, where applicable.
The "Gas or Air Flow Rate" was provided by the source as cubic meters per minute (m³/min). For the purposes of these emissions calculations, the cubic meters per minute (m³/min) have been converted to cubic feet per minute (ft³/min).
Constant: according to Ap 42, Appendix A: Miscellaneous Data and Conversion Factors - Conversion Factors (09/85, page A22): 1 cubic meter/minute (m³/min) = 35.315 cubic feet per minute (ft³/min).
*Cyclone Control Efficiency (%) taken from the US EPA Air Pollution Control Technology Fact Sheet: Cyclones (EPA-452/F-03-005), and represents the average of the achievable control efficiency range.
** PM 2.5 emissions are assumed equal to PM10 emissions.

Methodology
Gas or Air Flow Rate (cubic feet per minute (ft3/min)) = [Gas or Air Flow Rate (cubic meters per minute (m3/min)) * 35.315]
PM Emission Rate in lbs/hr (after controls) = [(grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)]
PM Emission Rate in lbs/hr (before controls) = [(Controlled emission rate lb/hr) / (1- control efficiency)]
Mill House (AUMF-60769) PM Emission Rate in lbs/hr (before controls) = [((Controlled emission rate lb/hr) / (1- BH control efficiency)) / (1- cyclone control efficiency)]
PM10 Emission Rate in lbs/hr = [PM Emission Rate (lbs/hr) * 62/100]
Emission Rate in tons/yr = [(lbs/hr) (8760 hr/yr) (ton/2000 lb)]

Appendix A: Emission Calculations
Unrestricted Potential Emissions (tons/year)
Hazardous Air Pollutants (HAPs) from the
Chlorine Gas Flour Bleaching System

Company Name: Whitewater Mill, LLC
Address City IN Zip: 707 Harrison Brookville Road,
 West Harrison, Indiana 47060
Permit No.: F029-34507-00045
Reviewer: Hannah L. Desrosiers

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Material	Maximum Material Usage (oz Cl gas/lbs flour)	Maximum Material Usage (oz Cl gas/ton flour)	Maximum Throughput of Flour (tons/yr)	Maximum Material Usage (oz Cl gas/year)	Percent Chlorine Emitted from Process (%)	Potential to emit Chlorine (tons/yr)
Chlorine gas	0.02	40	219,000	8,760,000	0.01%	9.20E-05

Notes

Total emissions based on rated capacity at 8,760 hours/year.

Whitewater Mill LLC indicates that the amount of chlorine gas added to the process (i.e., the usage rate) is approx. 2 oz. per 100 lbs of finished flour.

The process is specifically designed to consume more than 99.99% of the gas.

It is assumed that the chlorine gas used in the process is 100% HAP.

Constants:

One (1) Liter (L) = 33.81402 ounces (oz)

One (1) pound (lb) = 453.59232 grams (g)

Density of chlorine gas = 3.2204 grams/Liter (g/L) at 0 °C, 1 atmosphere (14.7 psi @ sea lvl).

Reference: Perry, R.H. and Green, D. (Eds.) 1984. Perry's Chemical Engineer's Handbook, 6th Edition, page 3-78. McGraw Hill, Inc., New York, NY. (ISBN: 0-07-049479-7)

Methodology

Maximum Material Usage (oz Cl/lbs flour) = [2 oz. chlorine / 100 lbs of finished flour]

Maximum Material Usage (oz Cl gas/ton flour) = [Maximum Material Usage (oz Cl/lbs flour) * 2000 lbs/1 ton]

Maximum Material Usage (oz Cl gas/year) = [Maximum Material Usage (oz Cl gas/ton flour) * Maximum Throughput of Flour (tons/yr)]

Percent Chlorine Emitted from Process (%) = [1 - (99.99% of Chlorine Gas Consumed in Process)/100%]

PTE of Chlorine (tons/yr) = [(Maximum Material Usage (oz Cl gas/year)) * (1 L/33.81402 oz) * (Density of Chlorine Gas (g/L) * (1 lb/ (453.59232 g) * (1 ton/2000lbs) * (Percent Chlorine Emitted from Process (%))]

Appendix A: Emissions Calculations
Unrestricted Potential Emissions (tons/year)
Particulate (PM/PM10/PM2.5)

Company Name: Whitewater Mill, LLC
Address City IN Zip: 707 Harrison Brookville Road, West Harrison, Indiana 47060
Permit No.: F029-34507-00045
Reviewer: Hannah L. Desrosiers

Unit ID	Emission Unit Description	Throughput ^(a) (tons/hr)	PM Emission Factor ^(b) (lb/ton)	PM10 Emission Factor ^(b) (lb/ton)	PM2.5 Emission Factor ^(b) (lb/ton)	PM Emissions (tons/yr)	PM10 Emissions (tons/yr)	PM2.5 Emissions (tons/yr)
Ducted/Ductable Emissions								
AUMF-60775	Finished Product Loadout	25	0.086	0.029	0.0049	9.42	3.18	0.54
AUMF 60778	Byproducts & Mill Feed Loadout	25	0.086	0.029	0.0049	9.42	3.18	0.54

Methodology

Total emissions based on rated capacity at 8,760 hours/year.

- (a) The wheat milling operation, contained in the Mill House, is the limiting factor for these facilities and acts as an "operational bottleneck"; therefore, the potential to emit was calculated based on the bottleneck throughput of 25 tons of finished product (wheat flour), byproducts, and/or mill feed per hour (219,000 tons per year).
- (b) Emission Factors are from AP 42, Chapter 9.9.1 Grain Elevators And Processes, Table 9.9.1-1. Particulate Emission Factors for Grain Elevators.
The emission factors for "Truck (unspecified) (SCC 3-02-005-60)" have been used to form a worst-case estimate.

$$\text{PM/PM10/PM2.5 Emissions (tons/yr)} = \text{Throughput (tons/hr)} \times \text{Emission Factor (lb/ton)} \times 8760 \text{ hr/yr} / 2000 \text{ lb/ton}$$

Appendix A: Emission Calculations
Fugitive Dust Emissions
Paved Roads

Company Name: Whitewater Mill, LLC
Address City IN Zip: 707 Harrison Brookville Road, West Harrison, Indiana 47060
Permit No.: F029-34507-00045
Reviewer: Hannah L. Desrosiers

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 Informtation (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	50.0	1.0	50.0	40.0	2,000.0	850	0.161	8.0	2,938.0
Vehicle (leaving plant) (one-way trip)	50.0	1.0	50.0	15.0	750.0	850	0.161	8.0	2,938.0
			0		0		0	0	0
			0		0		0	0	0
Totals			100.0		2,750.0			16.1	5,875.9

Average Vehicle Weight Per Trip = 27.5 tons/trip
Average Miles Per Trip = 0.16 miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	27.5	27.5	27.5	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, 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 =	2.555	0.511	0.1255	lb/mile
Mitigated Emission Factor, Eext =	2.337	0.467	0.1147	lb/mile
Dust Control Efficiency =	0%	0%	0%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	3.75	0.75	0.18	3.43	0.69	0.17	3.43	0.69	0.17
Vehicle (leaving plant) (one-way trip)	3.75	0.75	0.18	3.43	0.69	0.17	3.43	0.69	0.17
	0	0	0	0	0	0	0	0	0
	0	0	0	0	0	0	0	0	0
Totals	7.51	1.50	0.37	6.87	1.37	0.34	6.87	1.37	0.34

Methodology

Total emissions based on rated capacity at 8,760 hours/year.
Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

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

Appendix A: Emission Calculations
Controlled Potential Emissions (tons/year)

Company Name: Whitewater Mill, LLC
Address City IN Zip: 707 Harrison Brookville Road, West Harrison, Indiana 47060
Permit No.: F029-34507-00045
Reviewer: Hannah L. Desrosiers

Emissions Unit Description (Unit ID)	Process	Stack ID	Baghouse or Filter #	Grain Loading per Actual Cubic foot of Outlet Air (grains/dry std. cub. ft.)	Gas or Air Flow Rate (m³/m.)	Gas or Air Flow Rate (ft³/m.)	Limited PM Emission Rate (lb/hr)	Limited PM Emission Rate (tons/yr)	Limited PM10 Emission Rate (lb/hr)**	Limited PM10 Emission Rate (tons/yr)**	Equivalent Control Efficiency (%)
Receiving, Pre-cleaning, & Handling (AUMF-60787)	Wheat Intake	S1	01	0.02	770	27,193	4.66	20.42	2.89	12.66	99.55%
	Pre-cleaning	S2	02	0.01	1,304	46,051	3.95	17.29	2.45	10.72	99.77%
	Silo chain conveyor	S3	03	0.03	36	1,271	0.33	1.43	0.20	0.89	99.32%
Cleaning House (AUMF-60770)	Cleaning	S5	05	0.03	458	16,174	4.16	18.22	2.58	11.29	99.32%
	Screenings	S6	06	0.03	75	2,649	0.68	2.98	0.42	1.85	99.32%
	Light Wheat Bin	n/a	17	0.03	6	212	0.05	0.24	0.03	0.15	99.32%
	Ungr. Screenings Bin	n/a	18	0.03	27	954	0.25	1.07	0.15	0.67	99.32%
	Ground Screenings Bin	n/a	19	0.03	5	177	0.05	0.20	0.03	0.12	99.32%
Mill House (AUMF-60769)	Mill - pneumatic	S7	07	0.03	330	11,654	3.00	13.13	1.86	8.14	99.86%
	Mill - pneumatic	S8	08	0.03	330	11,654	3.00	13.13	1.86	8.14	
	Mill - aspiration	S9	09	0.03	273	9,641	2.48	10.86	1.54	6.73	99.86%
Finished Product Handling (AUMF-60629)	Total Receiver High Ash Flour Line	n/a	20	0.03	5	177	0.05	0.20	0.03	0.12	99.32%
	Start Up Bin	n/a	21	0.03	54	1,907	0.49	2.15	0.30	1.33	99.32%
	Airlock Hopper CLEAR Flour	n/a	22	0.03	7	247	0.06	0.28	0.04	0.17	99.32%
	Airlock Hopper CAKE Flour	n/a	23	0.03	7	247	0.06	0.28	0.04	0.17	99.32%
	Airlock Hopper PATENT Flour	n/a	24	0.03	7	247	0.06	0.28	0.04	0.17	99.32%
	Airlock Hopper WHOLE WHEAT FL.	n/a	25	0.03	7	247	0.06	0.28	0.04	0.17	99.32%
	Total Receiver HIGH ASH FL.	n/a	26	0.03	3	106	0.03	0.12	0.02	0.07	99.32%
	Airlock Hopper FLOUR To Packing	n/a	27	0.03	10	353	0.09	0.40	0.06	0.25	99.32%
	Airlock Hopper FLOUR To Packing	n/a	28	0.03	10	353	0.09	0.40	0.06	0.25	99.32%
	WHOLE WHEAT Bin	n/a	29	0.03	41	1,448	0.37	1.63	0.23	1.01	99.32%
	HIGH ASH Bin	n/a	30	0.03	12	424	0.11	0.48	0.07	0.30	99.32%
	CAKE FLOUR Bin	n/a	31	0.03	41	1,448	0.37	1.63	0.23	1.01	99.32%
Finished Product Storage (AUMF-60775)	Total Receiver	S10	10	0.03	53	1,872	0.48	2.11	0.30	1.31	99.32%
	Flour line sifter to load out bins	n/a	33	0.03	7	247	0.06	0.28	0.04	0.17	99.32%
	Total Receiver Vacuum System	n/a	34	0.03	27	954	0.25	1.07	0.15	0.67	99.32%
	Packer aspiration filter	n/a	35	0.03	20	706	0.18	0.80	0.11	0.49	99.32%
	PATENT packing bin	n/a	36	0.03	55	1,942	0.50	2.19	0.31	1.36	99.32%
	PATENT packing bin	n/a	37	0.03	55	1,942	0.50	2.19	0.31	1.36	99.32%
	OUTLOAD bin	n/a	39	0.03	55	1,942	0.50	2.19	0.31	1.36	99.32%
	OUTLOAD bin	n/a	40	0.03	55	1,942	0.50	2.19	0.31	1.36	99.32%
Byproducts & Mill Feed Handling, & Storage (AUMF 60778)	OUTLOAD bin	n/a	41	0.03	55	1,942	0.50	2.19	0.31	1.36	99.32%
	Bran bins	S12	12	0.03	153	5,403	1.39	6.09	0.86	3.77	99.32%
	Mill Feed Outload	S13	13	0.03	33	1,165	0.30	1.31	0.19	0.81	99.32%
	Mill Feed Outload	S14	14	0.03	33	1,165	0.30	1.31	0.19	0.81	99.32%
	Mill Feed Outload	S15	15	0.03	33	1,165	0.30	1.31	0.19	0.81	99.32%
	Mill Feed Outload	S16	16	0.03	33	1,165	0.30	1.31	0.19	0.81	99.32%
	RED DOG bin	n/a	43	0.03	18	636	0.16	0.72	0.10	0.44	99.32%
	Totals:						30.67	134.32	19.01	83.28	

Notes

Total emissions based on rated capacity at 8,760 hours/year.

n/a = not applicable. Unit exhausts inside the building.

Constant: according to Ap 42, Appendix A: Miscellaneous Data and Conversion Factors - Conversion Factors (09/85, page A22): 1 cubic meter/minute (m³/min) = 35.315 cubic feet per minute (ft³/min).

The "Gas or Air Flow Rate" was provided by the source as cubic meters per minute (m³/min). For the purposes of these emissions calculations, the cubic meters per minute (m³/min) have been converted to cubic feet per minute (ft³/min).

** PM 2.5 emissions are assumed equal to PM10 emissions.

Methodology

Gas or Air Flow Rate (cubic feet per minute (ft3/min)) = Gas or Air Flow Rate (cubic meters per minute (m3/min)) * 35.315

Limited PM Emission Rate (lb/hr) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Limited PM10 Emission Rate (lbs/hr) = [Limited PM Emission Rate (lbs/hr) * 62/100]

Limited PM/PM10 Emission Rate (tons/yr) = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Equivalent Control Efficiency (%) = [(1 - (Limited PM Emissions (tons/yr) / Unlimited PTE PM (tons/yr)))*100]

**Appendix B: Cost Benefit Analysis
for the "Integral to Process" Determination
Source-wide Summary**

Company Name: Whitewater Mill, LLC
Address City IN Zip: 707 Harrison Brookville Road, West Harrison, Indiana 47060
Permit No.: F029-34507-00045
Reviewer: Hannah L. Desrosiers

Process Area Description (Process ID)	Affected Process	Baghouse or Filter ID	Total Annual Savings from Material Recovery per Baghouse/Filter (\$/yr)	Total Combined Annual Savings per Process Area (\$/yr)
Receiving / Precleaning / Handling / (AUMF-60787)	Wheat Intake	01	-\$8,149.80	-\$23,886.90
	Pre-cleaning	02	-\$14,689.80	
	Silo chain conveyor	03	-\$1,047.30	
Cleaning House (AUMF-60770)	Cleaning	05	-\$7,514.80	-\$13,394.03
	Screenings	06	-\$3,286.50	
	Light Wheat Bin	17	-\$734.74	
	Ungr. Screenings Bin	18	-\$1,121.50	
	Ground Screenings Bin	19	-\$736.50	
Mill House (AUMF-60769)	Mill - pneumatic	07	\$13,985.00	\$70,455.00
	Mill - pneumatic	08	\$13,985.00	
	Mill - aspiration	09	\$42,485.00	
Finished Product Handling (AUMF-60629)	Total Receiver	20	\$747.39	\$15,298.70
	Start Up Bin	21	\$887.39	
	Airlock Hopper	22	\$1,547.39	
	Airlock Hopper	23	\$1,547.39	
	Airlock Hopper	24	\$1,547.39	
	Airlock Hopper	25	\$1,547.39	
	Total Receiver	26	\$1,377.39	
	Airlock Hopper	27	\$1,547.39	
	Airlock Hopper	28	\$1,547.39	
	WHOLE WHEAT Bin	29	\$927.39	
	HIGH ASH Bin	30	\$1,147.39	
	CAKE FLOUR Bin	31	\$927.39	
Finished Product Loadout (AUMF-60775)	Total Receiver	10	\$45,590.00	\$48,819.13
	Flour line sifter to load out bins	33	\$1,547.39	
	Total Receiver Vacuum System	34	\$417.39	
	Packer aspiration filter	35	\$677.39	
	PATENT packing bin	36	\$117.39	
	PATENT packing bin	37	\$117.39	
	OUTLOAD bin	39	\$117.39	
	OUTLOAD bin	40	\$117.39	
	OUTLOAD bin	41	\$117.39	
Byproducts & Mill Feed Handling, Storage, & Loadout (AUMF-60778)	Bran bins	12	\$3,251.00	\$6,256.00
	Mill Feed Outload	13	\$796.50	
	Mill Feed Outload	14	\$796.50	
	Mill Feed Outload	15	\$796.50	
	Mill Feed Outload	16	\$796.50	
	RED DOG bin	43	-\$181.00	
Source-wide Combined Annual Savings from Recovery of Materials* (\$/yr):				\$103,547.90

Cost/Benefit Analysis	
Total Annual Value of Product Produced/Sold (\$/yr):	\$10,711,956.31
Total Annual Value of Byproduct Produced/Sold (\$/yr):	\$16,206,004.08
Total Annual Value of Products and Byproducts Produced/Sold (\$/yr):	\$26,917,960.39
Total Annual Direct Material Cost (\$/yr):	\$3,504,000.00
Total Annual Difference Between the Direct Material Cost and the Value of Products and Byproducts Produced/Sold (\$/yr):	\$23,413,960.39

Notes
The direct material cost, and value of product and byproduct, is assumed equal to the cost of raw materials, and value of recovered product and byproducts supplied by the source.

Methodology
Source-wide Combined Annual Savings from Recovery of Materials* (\$/yr) = [Σ(Total Combined Annual Savings per Process Area (\$/yr))]
Total Annual Value of Products and Byproducts Produced/Sold (\$/yr) = [Total Annual Value of Product Produced/Sold (\$/yr) + Total Annual Value of Byproduct Produced/Sold (\$/yr)]
Total Annual Difference Between the Direct Material Cost and the Value of Products and Byproducts Produced/Sold (\$/yr) = [Total Annual Value of Products and Byproducts Produced/Sold (\$/yr) - Total Annual Direct Material Cost (\$/yr)]

Appendix B: Cost Benefit Analysis for the "Integral to Process" Determination
for Raw Material Recovery

Company Name: Whitewater Mill, LLC
Source Address: 707 Harrison- Brookville Rd., West Harrison, IN 47060
Permit Number: F029-34057-00045
Reviewer: Hannah L. Desrosiers

Process Area (Process ID)		Receiving / Precleaning / Handling (AUMF-60787)			Cleaning House (AUMF-60770)				
Affected Process		Wheat Intake	Pre-cleaning	Silo chain conveyor	Cleaning	Screenings	Light Wheat Bin	Ungr. Screenings Bin	Ground Screenings Bin
Baghouse/Filter ID		#01	#02	#03	#05	#06	#17	#18	#19
Initial Investment									
Baghouse/Dust Collector (including installation and bags/filters)	\$	70,000.00	128,000	8,000	63,000	27,000	5,000	8,000	5,000
	\$								
	\$								
Total Initial Investment Costs	\$	70,000.00	128,000.00	8,000.00	63,000.00	27,000.00	5,000.00	8,000.00	5,000.00
Anticipated Life of the Equipment	yrs	10	10	10	10	10	10	10	10
Total Initial Investment annualized over anticipated life of equipment	\$/yr	7,000.00	12,800.00	800.00	6,300.00	2,700.00	500.00	800.00	500.00
Operations & Maintenance									
Bags/Filters (Annual Replacement Cost)	\$/yr	950.00	1,640.00	150.00	1,040.00	260	60.00	120.00	60.00
Estimated repairs	\$/yr	150.00	180.00	130.00	150.00	130	80.00	100.00	80.00
Electrical demand	\$/yr	100.00	120.00	80.00	100.00	125	75.00	80.00	75.00
Labor @ \$25/Hr *25Hrs	\$/yr	125.00	125.00	62.50	100.00	75	25.00	25.00	25.00
Total Annual Operations & Maintenance Costs	\$/yr	1,325.00	2,065.00	422.50	1,390.00	590.00	240.00	325.00	240.00
Total Annual Costs of the Baghouse/Dust Collector	\$/yr	8,325.00	14,865.00	1,222.50	7,690.00	3,290.00	740.00	1,125.00	740.00
Savings: Raw Material Recovery									
Estimated amount of raw material used in associated process*	lbs/yr	438,000,000	438,000,000	438,000,000	438,000,000	8,760,000	13,140,000	8,760,000	8,760,000
Percentage of raw material that is recovered	%	0.005%	0.005%	0.005%	0.005%	0.005%	0.005%	0.005%	0.005%
Estimated amount of raw material recovered	lbs/yr	21,900.00	21,900.00	21,900.00	21,900.00	438.00	657.00	438.00	438.00
Cost of raw material	\$/lb	0.008	0.008	0.008	0.008	0.008	0.008	0.008	0.008
Annual value of recovered raw material	\$/yr	175.20	175.20	175.20	175.20	3.50	5.26	3.50	3.50
Total Annual Costs	\$/yr	8,325.00	14,865.00	1,222.50	7,690.00	3,290.00	740.00	1,125.00	740.00
Total Annual Savings from Raw Material Recovery	\$/yr	-8,149.80	-14,689.80	-1,047.30	-7,514.80	-3,286.50	-734.74	-1,121.50	-736.50
Total Annual Direct Material Cost		\$/yr	3,504,000.00						
Total Combined Annual Savings from Raw Material Recovery		\$/yr	-37,280.93						

Notes

Constant: The centum weight (cwt), also known as the hundredweight (UK), is a unit of mass that is equal to 50.80 kilograms (112 pounds UK). 1 hundredweight (UK) = 0.0559999997531 short tn. 1 [short] ton = 2000 lbs.
Whitewater Mill, LLC anticipates operating 24 hrs/day, 5 days/week and 52 weeks/yr, for ; 260 days/yr, and 6,240.00 hours/yr.
* This wheat milling facility is specifically designed to process a maximum of 12,700 cwt of raw whole wheat per day. This equates to 711.20 [short] tons, or 1,422,400 pounds per day, and 259,588 tons, or 519,175,998 lbs, of raw whole wheat per year. However, Whitewater Mill, LLC indicates that the bottlenecked throughput capacity of the mill is 25 tons of raw whole wheat per hour, or 219,000 tons, or 438,000,000 pounds, per year. Finally, based on the operating schedule indicated in the application, the Whitewater Mill will operate 260 days/yr and produce 184,912 [short] tons, or 369,823,998 pounds, per year.

Methodology

Total Initial Investment Costs (\$) = [Σ (Initial Investment Costs)]
Total Initial Investment annualized over anticipated life of equipment (\$/yr) = [Total Initial Investment Costs (\$) / Anticipated Life of the Equipment (yrs)]
Total Annual Operations & Maintenance Costs (\$/yr) = [Σ (Operations & Maintenance Costs (\$/yr))]
Total Annual Costs of the Baghouse/Dust Collector (\$/yr) = [Total Initial Investment annualized over anticipated life of equipment (\$/yr) + Total Annual Operations & Maintenance Costs (\$/yr)]
Estimated amount of raw material recovered (lbs/yr) = [Estimated amount of raw material used in associated process (lbs/yr) * Percentage of raw material that is recovered (%)]
Annual value of recovered raw material (\$/lb) = [Estimated amount of raw material recovered (lbs/yr) * Cost of raw material (\$/lb)]
Total Annual Savings from Raw Material Recovery (\$/yr) = [Annual value of recovered raw material (\$/lb) - Total Annual Costs (\$/yr)]
Total Annual Direct Material Cost (\$/yr) = [Estimated amount of raw material received (tons/yr) * Cost of raw material (\$/lb)]
Total Combined Annual Savings from Raw Material Recovery (\$/yr) = [Σ (Total Annual Savings from Raw Material Recovery (\$/yr))]

Appendix B: Cost Benefit Analysis for the "Integral to Process" Determination for Product Recovery

Company Name: Whitewater Mill, LLC
Source Address: 707 Harrison- Brookville Rd., West Harrison, IN 47060
Permit Number: F029-34057-00045
Reviewer: Hannah L. Desrosiers

Process Area (Process ID)		Mill House (AUMF-60769)			Finished Product Handling (AUMF-60629)											
Affected Process		Mill - pneumatic	Mill - pneumatic	Mill - aspiration	Total Receiver High Ash Flour Line	Start Up Bin	Airlock Hopper Clear Flour	Airlock Hopper Cake Flour	Airlock Hopper Patent Flour	Airlock Hopper Whole Wheat Flour	Total Receiver High Ash Four	Airlock Hopper Flour To Packing	Airlock Hopper Flour To Packing	Whole Wheat Bin	High Ash Bin	Cake Flour Bin
Baghouse/Filter ID		#07	#08	#09	#20	#21	#22	#23	#24	#25	#26	#27	#28	#29	#30	#31
Initial Investment																
Baghouse/Dust Collector (including installation and bags/filters)	\$	65,000	65,000	57,000	11,000	9,000	3,500	3,500	3,500	3,500	5,000	3,500	3,500	8,600	7,500	8,600
	\$															
	\$															
Total Investment Costs	\$	65,000.00	65,000.00	57,000.00	11,000.00	9,000.00	3,500.00	3,500.00	3,500.00	3,500.00	5,000.00	3,500.00	3,500.00	8,600.00	7,500.00	8,600.00
Anticipated Life of the Equipment	yrs	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10
Total Initial Investment annualized over anticipated life of equipment	\$/yr	6,500.00	6,500.00	5,700.00	1,100.00	900.00	350.00	350.00	350.00	350.00	500.00	350.00	350.00	860.00	750.00	860.00
Operations & Maintenance																
Bags/Filters (Annual Replacement Cost)	\$/yr	1,040.00	1,040	780	90	150	40	40	40	40	60	40	40	150	40	150
Estimated repairs	\$/yr	150.00	150	130	100	100	100	100	100	100	100	100	100	100	100	100
Electrical demand	\$/yr	100.00	100	80	80	80	80	80	80	80	80	80	80	80	80	80
Labor @ \$25/Hr *40Hrs	\$/yr	125.00	125	100	25	25	25	25	25	25	25	25	25	25	25	25
Total Annual Operations & Maintenance Costs	\$/yr	1,415.00	1,415.00	1,090.00	295.00	355.00	245.00	245.00	245.00	245.00	265.00	245.00	245.00	355.00	245.00	355.00
Total Annual Costs of the Baghouse/Dust Collector																
	\$/yr	7,915.00	7,915.00	6,790.00	1,395.00	1,255.00	595.00	595.00	595.00	595.00	765.00	595.00	595.00	1,215.00	995.00	1,215.00
Savings: Product Recovery																
Estimated amount of product produced in associated process	lbs/yr	146,000,000	146,000,000	328,500,000	14,282,608	14,282,608	14,282,608	14,282,608	14,282,608	14,282,608	14,282,608	14,282,608	14,282,608	14,282,608	14,282,608	14,282,608
Percentage of product produced that is recovered	%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%
Estimated amount of product collected	lbs/yr	146,000.00	146,000.00	328,500.00	14,282.61	14,282.61	14,282.61	14,282.61	14,282.61	14,282.61	14,282.61	14,282.61	14,282.61	14,282.61	14,282.61	14,282.61
Value of recovered product	\$/lb	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15
Annual value of recovered product	\$/yr	21,900.00	21,900.00	49,275.00	2,142.39	2,142.39	2,142.39	2,142.39	2,142.39	2,142.39	2,142.39	2,142.39	2,142.39	2,142.39	2,142.39	2,142.39
Total Annual Costs	\$/yr	7,915.00	7,915.00	6,790.00	1,395.00	1,255.00	595.00	595.00	595.00	595.00	765.00	595.00	595.00	1,215.00	995.00	1,215.00
Total Annual Savings from Product Recovery	\$/yr	13,985.00	13,985.00	42,485.00	747.39	887.39	1,547.39	1,547.39	1,547.39	1,547.39	1,377.39	1,547.39	1,547.39	927.39	1,147.39	927.39

Total Annual Value of Product Produced/Sold	\$/yr	10,711,956.31
Total Combined Annual Savings from Product Recovery	\$/yr	134,572.83

Notes
Constant: The centum weight (cwt), also known as the hundredweight (UK), is a unit of mass that is equal to 50.80 kilograms (112 pounds UK). 1 hundredweight (UK) = 0.0559999997531 short tn. 1 [short] ton = 2000 lbs.
Whitewater Mill, LLC anticipates operating 24 hrs/day, 5 days/week and 52 weeks/yr, for 260 days/yr, ε 6,240.00 hours/yr.
This wheat milling facility is specifically designed to process a maximum of 12,700 cwt of raw whole wheat per day. This equates to 711.20 [short] tons, or 1,422,400 pounds per day, and 259,588 tons, or 519,175,998 lbs, of raw whole wheat per year. Whitewater Mill, LLC indicates that the bottlenecked throughput capacity of the mill is 219,000 tons, or 437,999,037 lbs, of raw whole wheat per year.
Finally, based on the operating schedule indicated in the application, the Whitewater Mill will operate 260 days/yr and produce 184,912 [short] tons, or 369,823,998 pounds, per year.

Methodology
Total Initial Investment Costs (\$) = [Σ (Initial Investment Costs)]
Total Initial Investment annualized over anticipated life of equipment (\$/yr) = [Total Initial Investment Costs (\$) / Anticipated Life of the Equipment (yrs)]
Total Annual Operations & Maintenance Costs (\$/yr) = [Σ (Operations & Maintenance Costs (\$/yr))]
Total Annual Costs of the Baghouse/Dust Collector (\$/yr) = [Total Initial Investment annualized over anticipated life of equipment (\$/yr) + Total Annual Operations & Maintenance Costs (\$/yr)]
Estimated amount of product recovered (lbs/yr) = [Estimated amount of product produced in associated process (lbs/yr) * Percentage of raw material that is recovered (%)]
Annual value of recovered product (\$/lb) = [Estimated amount of product recovered (lbs/yr) * Value of recovered product (\$/lb)]
Total Annual Savings from Product Recovery (\$/yr) = [Annual value of recovered product (\$/lb) - Total Annual Costs (\$/yr)]
Total Annual Value of Product Produced/Sold (\$/yr) = [(Σ (Estimated amount of product produced in associated process: Patent packing bins #37 + #38 + Outload Bins #39 + #40 + #41 (lbs/yr)) * Value of recovered product (\$/lb)
Total Combined Annual Savings from Product Recovery (\$/yr) = [Σ (Total Annual Savings from Product Recovery (\$/yr))]

**Appendix B: Cost Benefit Analysis for the "Integral to Process" Determination
for Product Recovery (continued)**

Page 4 of 5; TSD App B

Company Name: Whitewater Mill, LLC
Source Address: 707 Harrison- Brookville Rd., West Harrison, IN 47060
Permit Number: F029-34057-00045
Reviewer: Hannah L. Desrosiers

Process Area (Process ID)		Finished Product Loadout (AUMF-60775)								
Affected Process		Total Receiver	Flour line sifter to load out bins	Total Receiver Vacuum System	Packer aspiration filter	Patent packing bin	Patent packing bin	Outload bin	Outload bin	Outload bin
Baghouse/Filter ID		#10	#33	#34	#35	#36	#37	#39	#40	#41
Initial Investment										
Baghouse/Dust Collector (including installation and bags/filters)	\$	33,000	3,500	14,000	12,000	17,000	17,000	17,000	17,000	17,000
	\$									
	\$									
Total Investment Costs	\$	33,000.00	3,500.00	14,000.00	12,000.00	17,000.00	17,000.00	17,000.00	17,000.00	17,000.00
Anticipated Life of the Equipment	yrs	10	10	10	10	10	10	10	10	10
Total Initial Investment annualized over anticipated life of equipment	\$/yr	3,300.00	350.00	1,400.00	1,200.00	1,700.00	1,700.00	1,700.00	1,700.00	1,700.00
Operations & Maintenance										
Bags/Filters (Annual Replacement Cost)	\$/yr	180	40	120	60	120	120	120	120	120
Estimated repairs	\$/yr	100	100	100	100	100	100	100	100	100
Electrical demand	\$/yr	80	80	80	80	80	80	80	80	80
Labor @ \$25/Hr *40Hrs	\$/yr	25	25	25	25	25	25	25	25	25
Total Annual Operations & Maintenance Costs	\$/yr	385.00	245.00	325.00	265.00	325.00	325.00	325.00	325.00	325.00
Total Annual Costs of the Baghouse/Dust Collector	\$/yr	3,685.00	595.00	1,725.00	1,465.00	2,025.00	2,025.00	2,025.00	2,025.00	2,025.00
Savings: Product Recovery										
Estimated amount of product produced in associated process	lbs/yr	328,500,000	14,282,608	14,282,608	14,282,608	14,282,608	14,282,608	14,282,608	14,282,608	14,282,608
Percentage of product produced that is recovered	%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%
Estimated amount of product collected	lbs/yr	328,500.00	14,282.61	14,282.61	14,282.61	14,282.61	14,282.61	14,282.61	14,282.61	14,282.61
Value of recovered product	\$/lb	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15
Annual value of recovered product	\$/yr	49,275.00	2,142.39	2,142.39	2,142.39	2,142.39	2,142.39	2,142.39	2,142.39	2,142.39
Total Annual Costs	\$/yr	3,685.00	595.00	1,725.00	1,465.00	2,025.00	2,025.00	2,025.00	2,025.00	2,025.00
Total Annual Savings from Product Recovery	\$/yr	45,590.00	1,547.39	417.39	677.39	117.39	117.39	117.39	117.39	117.39

Notes

Constant: The centum weight (cwt), also known as the hundredweight (UK), is a unit of mass that is equal to 50.80 kilograms (112 pounds UK). 1 hundredweight (UK) = 0.055999997531 short tn. 1 [short] ton = 2000 lbs.
Whitewater Mill, LLC anticipates operating 24 hrs/day, 5 days/week and 52 weeks/yr, for a tc 260 days/yr, an 6,240.00 hours/yr.
This wheat milling facility is specifically designed to process a maximum of 12,700 cwt of raw whole wheat per day. This equates to 711.20 [short] tons, or 1,422,400 pounds per day, and 259,588 tons, or 519,175,998 lbs, of raw whole wheat per year. Whitewater Mill, LLC indicates that the bottlenecked throughput capacity of the mill is 219,000 tons, or 437,999,037 lbs, of raw whole wheat per year. Finally, based on the operating schedule indicated in the application, the Whitewater Mill will operate 260 days/yr and produce 184,912 [short] tons, or 369,823,998 pounds, per year.

Methodology

Total Initial Investment Costs (\$) = [Σ (Initial Investment Costs)]
Total Initial Investment annualized over anticipated life of equipment (\$/yr) = [Total Initial Investment Costs (\$) / Anticipated Life of the Equipment (yrs)]
Total Annual Operations & Maintenance Costs (\$/yr) = [Σ (Operations & Maintenance Costs (\$/yr))]
Total Annual Costs of the Baghouse/Dust Collector (\$/yr) = [Total Initial Investment annualized over anticipated life of equipment (\$/yr) + Total Annual Operations & Maintenance Costs (\$/yr)]
Estimated amount of product recovered (lbs/yr) = [Estimated amount of product produced in associated process (lbs/yr) * Percentage of raw material that is recovered (%)]
Annual value of recovered product (\$/lb) = [Estimated amount of product recovered (lbs/yr) * Value of recovered product (\$/lb)]
Total Annual Savings from Product Recovery (\$/yr) = [Annual value of recovered product (\$/lb) - Total Annual Costs (\$/yr)]
Total Annual Value of Product (\$/yr) = [(Σ (Estimated amount of product produced in associated process: Patent packing bins #37 + #38 + Outload Bins #39 + #40 + #41 (lbs/yr)) * Value of recovered product (\$/lb)
Total Combined Annual Savings from Product Recovery (\$/yr) = [Σ (Total Annual Savings from Product Recovery (\$/yr))]

**Appendix B: Cost Benefit Analysis for the "Integral to Process" Determination
for Byproduct Recovery**

Page 5 of 5; TSD App B

Company Name: Whitewater Mill, LLC
Source Address: 707 Harrison- Brookville Rd., West Harrison, IN 47060
Permit Number: F029-34057-00045
Reviewer: Hannah L. Desrosiers

Process Area (Process ID)		Byproducts & Mill Feed Handling, Storage, and Loadout (AUMF-60778)					
Affected Process		Bran bin	Mill Feed Outload Bin	Mill Feed Outload Bin	Mill Feed Outload Bin	Mill Feed Outload Bin	RED DOG bin
Baghouse/Filter ID		#12	#13	#14	#15	#16	#43
Initial Investment							
Baghouse/Dust Collector (including installation and bags/filters)	\$	36,000.00	7,000	7,000	7,000	7,000	12,000
	\$						
	\$						
Total Investment Costs	\$	36,000.00	7,000.00	7,000.00	7,000.00	7,000.00	12,000.00
Anticipated Life of the Equipment	yrs	10	10	10	10	10	10
Total Initial Investment annualized over anticipated life of equipment	\$/yr	3,600.00	700.00	700.00	700.00	700.00	1,200.00
Operations & Maintenance							
Bags/Filters (Annual Replacement Cost)	\$/yr	390.00	160	160	160	160	90
Estimated repairs	\$/yr	100.00	100	100	100	100	100
Electrical demand	\$/yr	80.00	80	80	80	80	80
Labor @ \$25/Hr *6Hrs	\$/yr	25.00	25	25	25	25	25
Total Annual Operations & Maintenance Costs	\$/yr	595.00	365.00	365.00	365.00	365.00	295.00
Total Annual Costs of the Baghouse/Dust Collector	\$/yr	4,195.00	1,065.00	1,065.00	1,065.00	1,065.00	1,495.00
Savings: Byproduct Recovery							
Estimated amount of Byproduct produced in associated process	lbs/yr	93,075,026.50	23,268,756	23,268,756	23,268,756	23,268,756	16,425,000
Percentage of Byproduct produced that is recovered	%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%
Estimated amount of Byproduct collected	lbs/yr	93,075.03	23,268.76	23,268.76	23,268.76	23,268.76	16,425.00
Value of recovered Byproduct	\$/lb	0.08	0.08	0.08	0.08	0.08	0.08
Annual value of recovered Byproduct	\$/yr	7,446.00	1,861.50	1,861.50	1,861.50	1,861.50	1,314.00
Total Annual Costs	\$/yr	4,195.00	1,065.00	1,065.00	1,065.00	1,065.00	1,495.00
Total Annual Savings from Byproduct Recovery	\$/yr	3,251.00	796.50	796.50	796.50	796.50	-181.00
Total Annual Value of Byproduct Produced/Sold							
	\$/yr	16,206,004.08					
Total Combined Annual Savings from Byproduct Recovery							
	\$/yr	6,256.00					

Notes

Constant: The centum weight (cwt), also known as the hundredweight (UK), is a unit of mass that is equal to 50.80 kilograms (112 pounds UK). 1 hundredweight (UK) = 0.0559999997531 short tn. 1 [short] ton = 2000 lbs.

Whitewater Mill, LLC anticipates operating 24 hrs/day, 5 days/week and 52 weeks/yr, for a total of 260 days/yr, and 6,240.00 hours/yr.

This wheat milling facility is specifically designed to process a maximum of 12,700 cwt of raw whole wheat per day. This equates to 711.20 [short] tons, or 1,422,400 pounds per day, and 259,588 tons, or 519,175,998 lbs, of raw whole wheat per year. Whitewater Mill, LLC indicates that the bottlenecked throughput capacity of the mill is 219,000 tons, or 437,999,037 lbs, of raw whole wheat per year. Finally, based on the operating schedule indicated in the application, the Whitewater Mill will operate 260 days/yr and produce 184,912 [short] tons, or 369,823,998 pounds, per year.

Methodology

Total Initial Investment Costs (\$) = [Σ (Initial Investment Costs)]

Total Initial Investment annualized over anticipated life of equipment (\$/yr) = [Total Initial Investment Costs (\$) / Anticipated Life of the Equipment (yrs)]

Total Annual Operations & Maintenance Costs (\$/yr) = [Σ (Operations & Maintenance Costs (\$/yr))]

Total Annual Costs of the Baghouse/Dust Collector (\$/yr) = [Total Initial Investment annualized over anticipated life of equipment (\$/yr) + Total Annual Operations & Maintenance Costs (\$/yr)]

Annual value of recovered Byproduct (\$/lb) = [Estimated amount of Byproduct recovered (lbs/yr) * Value of recovered Byproduct (\$/lb)]

Total Annual Savings from Byproduct Recovery (\$/yr) = [Annual value of recovered Byproduct (\$/lb) - Total Annual Costs (\$/yr)]

Total Annual Value of Byproduct Produced/Sold (\$/yr) = [(Σ (Estimated amount of Byproduct produced in associated process: Bran bin #12, + Millfeed Outload Bins #13 + #14 + #15 + #16, + RED DOG Bin #43 (lbs/yr)) * Value of recovered Byproduct (\$/lb)

Total Combined Annual Savings from Byproduct Recovery (\$/yr) = [Σ (Total Annual Savings from Byproduct Recovery (\$/yr))]



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Sunil Maheshwari
Whitewater Mill, LLC
PO Box 670
Tuetopolis, IL 62467

DATE: September 25, 2014

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

SUBJECT: Final Decision
FESOP
029-34057-00045

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

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

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

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

Final Applicant Cover letter.dot 6/13/2013



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

September 25, 2014

TO: North Dearborn Branch Library

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

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

Applicant Name: Whitewater Mill, LLC
Permit Number: 029-34057-00045

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

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

Enclosures
Final Library.dot 6/13/2013


Mail Code 61-53

IDEM Staff	AWELLS 9/25/2014 Whitewater Mill LLC 029-34057-00045 Final		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	 Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Sunil Maheshwari Whitewater Mill LLC PO Box 670 Tuetopolis IL 62467 (Source CAATS)									
2		Michael & Monica Ramsey 9931 Old SR 56 Aurora IN 47001 (Affected Party)									
3		Dearborn County Commissioner 215 B West High Street Lawrenceburg IN 47025 (Local Official)									
4		Dearborn County Health Department 215-b W. Hight St, County Admin Building Lawrenceburg IN 47025-1910 (Health Department)									
5		Mr. John Teaney P.O. Box 494 10837 Aurora IN 47001 (Affected Party)									
6		Robin & Vic Willoughby 311 Broadway Street Aurora IN 47001 (Affected Party)									
7		James & Mary Hassett 7199 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)									
8		Ken & Jackie Greive 4685 E. Laughery Creek Road Aurora IN 47001 (Affected Party)									
9		Marlin M. Guss, Jr. 10400 Millstone Dr, P.O. Box 272 Aurora IN 47001 (Affected Party)									
10		Mrs. Shirley Greive 4412 E. Laughery Aurora IN 47001 (Affected Party)									
11		Ms. Patricia Huff 10095 Old SR 56 Aurora IN 47001 (Affected Party)									
12		Sam & Nancy Valone 3826 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)									
13		Mrs. Melanie Bushorn 4172 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)									
14		West Harrison Town Council 100 Railroad Ave. West Harrison IN 47060 (Local Official)									
15		Jon Seymour Whitewater Mill, LLC PO Box 4172 Lawrenceburg IN 47025 (Affected Party)									

Total number of pieces Listed by Sender 14	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Mail Code 61-53

IDEM Staff	AWELLS 9/25/2014 Whitewater Mill LLC 029-34057-00045 Final		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	 Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		North Dearborn Branch Library 25969 Dole Road West Harrison IN 47060 (Library)									
2											
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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