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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To:	Interested Parties
Date:	October 7, 2014
From:	Matthew Stuckey, Chief Permits Branch Office of Air Quality
Source Name:	PacMoore Process Technologies
Permit Level:	FESOP
Permit Number:	109-34458-00062
Source Location:	100 PacMoore Parkway, Mooresville, Indiana
Type of Action Taken:	Modification at an existing source Changes that are administrative in nature

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 34458.

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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October 7, 2014

Chris Hallman
PacMoore Process Technologies
100 PacMoore Parkway
Mooresville, IN 46158

Re: 109-34458-00062
First Significant Revision to
F109-30338-00062

Dear Chris Hallman:

PacMoore Process Technologies was issued a Federally Enforceable State Operating Permit (FESOP) No. 109-30338-00062 on July 29, 2011 for a stationary dry food grade materials manufacturing facility located at 100 PacMoore Pkwy, Mooresville, IN 46158. On April 21, 2014, the Office of Air Quality (OAQ) received an application from the source requesting the construction of a new baghouse, two (2) bag dumping stations, two (2) mix tanks, and a fluid bed dryer. Additionally, the company is requesting that its existing packaging stations be established as moveable units, which could be located at any given line on a case by case as needed basis, and finally, a number of administrative corrections have been requested to clarify the operations at this existing source. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

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

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 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.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Ms. Hannah Desrosiers, of my staff, at (317) 233-9327 or toll free at 1-800-451-6027 extension 3-9327.

Sincerely,

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

Attachments: Technical Support Document and revised permit
NB/hd
cc: File - Morgan County
Morgan County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch

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

PacMoore Process Technologies
100 PacMoore Pkwy
Mooresville, Indiana 46158

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

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

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

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

Operation Permit No. F109-30338-00062	
Original signed by: Alfred C. Dumaual, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: July 29, 2011 Expiration Date: July 29, 2016
First Administrative Amendment No. F109-33076-00062, issued June 11, 2013; First Significant Permit Revision No. F109-33209-00062, issued July 25, 2013.	
Second Significant Permit Revision No. 109-34458-00062	
Issued by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 7, 2014 Expiration Date: July 29, 2016

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SECTION A SOURCE SUMMARY

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

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

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

Source Address:	100 PacMoore Pkwy, Mooresville, Indiana 46158
General Source Phone Number:	(317) 831-2666
SIC Code:	2099
County Location:	Morgan
Source Location Status:	Nonattainment for SO2 standard Attainment for all other 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) One (1) Blend Room, identified as Blend Room 1, constructed in 2006 and permitted in 2011, consisting of a sifter, mixer, and packaging station docking station, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, equipped with a baghouse, identified as BH1, to control particulate matter emissions from the sifter, and a baghouse, identified as BH2, to control particulate matter emissions from a docked moveable packaging station, both baghouses exhaust inside the building;

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

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

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

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

(f) One (1) Rail/Truck Unloading, identified as Rail/Truck Unloading, constructed in 2006 and permitted in 2011, with a maximum throughput capacity of 10,000 lbs dry food-grade materials/hour, with materials conveyed to a silo equipped with a bin vent, identified as BV1, venting indoors, and materials transferred to a packaging station docking station, equipped with a a baghouse, identified as BH11, to control particulate matter emissions from a docked moveable packaging station, and exhausting inside the building;

(g) One (1) Baler, identified as Baler, constructed in 2006 and permitted in 2011, to compact a maximum capacity of 12,500 lbs of used product bags/hour, equipped with a baghouse, identified as BH12, to control particulate matter emissions, and exhausting inside the building;

(h) One (1) Pilot Spray Dryer, identified as Pilot Spray Dryer, constructed in 2007 and permitted in 2011, with a maximum throughput capacity of 60 lbs dry food-grade materials/hour, consisting of an electric heater, an integral product recovery cyclone, identified as C0, and a baghouse, identified as BH14, to control particulate emissions, exhausting outside the building;

(i) One (1) Spray Dryer Line, identified as Spray Dryer 1, with a maximum/bottlenecked throughput capacity of 1,960 lbs dry food-grade materials/hour, and including:

(1) Two (2) Bag Dump Stations, identified as Bag Dump 1 and Bag Dump 2, constructed in 2012 and permitted in 2014, having a combined maximum throughput capacity of 2000 lbs dry food-grade materials/hour, and a total combined process weight of 5,000 lbs of wet and dry materials/hr, controlling particulate matter emissions with one (1) baghouse, identified as BH17, and exhausting outside the building;

(2) Two (2) Mix Tanks, identified as Mix Tank 1 and Mix Tank 2, constructed in 2012 and permitted in 2014, having a total combined maximum throughput capacity of 2000 lbs dry food-grade materials/hour, and a total combined process weight of 5,000 lbs of wet and dry materials/hr, controlling particulate matter emissions with one (1) baghouse, identified as BH17, and exhausting outside the building;

(3) One (1) Spray Dryer, identified as Spray Dryer 1, constructed in 2011, having a maximum throughput capacity of 2,000 lbs dry food-grade materials/hour, and a total process weight of 5,000 lbs of wet and dry materials/hr, equipped with one (1) 6.4 MMBtu/hr natural gas-fired dryer with low-NOx burners, and one (1) large integral product recovery cyclone, identified as C1, controlling particulate matter emissions with one (1) baghouse, identified as BH13, and exhausting outside the building;

(4) One (1) Fluid Bed Dryer, identified as Fluid Bed Dryer, constructed in 2011 and permitted in 2014, having a combined maximum throughput capacity of 1,960 lbs dry food-grade materials/hour, and a total process weight of 4,900 lbs of wet and dry materials/hr, equipped with a small integral product recovery cyclone, identified as C2, controlling particulate matter emissions with one (1) baghouse, identified as BH18, and exhausting outside the building; and

This Fluid Bed Dryer acts as an operational bottleneck for this line, limiting material throughput to 1,960 lbs dry food-grade materials/hour.

(5) One (1) packaging station docking station, controlling particulate matter emissions with one (1) baghouse, identified as BH13, and exhausting outside the building.

(j) One (1) Milling Line, identified as Grinding Mill 1, including the following:

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

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

(3) One (1) receiving bin, identified as Large Receiving Bin, constructed in 2013, with a maximum capacity of 1,500 lbs dry food grade materials, equipped with a baghouse, identified as BH16, to control particulate matter emissions, and exhausting outside the building; and

(4) One (1) packaging station docking station, controlling particulate matter emissions with one (1) baghouse, identified as BH19, and exhausting inside the building.

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

This stationary source also includes the following insignificant activities:

(a) One (1) natural gas-fired boiler, identified as boiler 1, constructed in 2006, permitted in 2011, with a maximum heat input capacity of 0.2 MMBtu/hr, uncontrolled and exhausting inside the building;

(b) One (1) natural gas-fired water heater, constructed in 2006, permitted in 2011, with a maximum heat input capacity of 0.66 MMBtu/hr, uncontrolled and exhausting inside the building; and

(c) Fourteen (14) moveable final product packaging stations, as follows:

(1) one (1) moveable packaging station, identified as 032, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an “as needed” basis;

(2) one (1) moveable packaging station, identified as 035, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an “as needed” basis;

(3) one (1) moveable packaging station, identified as 051, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an “as needed” basis;

(4) one (1) moveable packaging station, identified as 054, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(5) one (1) moveable packaging station, identified as 062, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(6) one (1) moveable packaging station, identified as 063, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(7) one (1) moveable packaging station, identified as 064, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(8) one (1) moveable packaging station, identified as 066, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(9) one (1) moveable packaging station, identified as 067, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(10) one (1) moveable packaging station, identified as 068, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(11) one (1) moveable packaging station, identified as 069, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(12) one (1) moveable packaging station, identified as 00166, constructed in 2013, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(13) one (1) moveable packaging station, identified as 00170, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(14) one (1) moveable packaging station, identified as 00172, constructed in 2011, with a maximum throughput capacity of 2,000 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

Note: Each of the above-listed moveable packaging stations may be moved throughout the plant and are connected to a given line, as needed, as appropriate to the packaging requirements for the order being filled.

(d) Package marking (LP-1) with potential VOC uncontrolled emissions from ink usage meeting the exemption levels under 326 IAC 2-7-1(21)(A) and (B).

(e) Paved roads with no controls.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

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

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

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

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

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

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

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

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

(1) That this permit contains a material mistake.

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

(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 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

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

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

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(b) The address for report submittal is:

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

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

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

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

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

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

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

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

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

(f) One (1) Rail/Truck Unloading, identified as Rail/Truck Unloading, constructed in 2006 and permitted in 2011, with a maximum throughput capacity of 10,000 lbs dry food-grade materials/hour, with materials conveyed to a silo equipped with a bin vent, identified as BV1, venting indoors, and materials transferred to a packaging station docking station, equipped with a a baghouse, identified as BH11, to control particulate matter emissions from a docked moveable packaging station, and exhausting inside the building;

(g) One (1) Baler, identified as Baler, constructed in 2006 and permitted in 2011, to compact a maximum capacity of 12,500 lbs of used product bags/hour, equipped with a baghouse, identified as BH12, to control particulate matter emissions, and exhausting inside the building;

(h) One (1) Pilot Spray Dryer, identified as Pilot Spray Dryer, constructed in 2007 and permitted in 2011, with a maximum throughput capacity of 60 lbs dry food-grade materials/hour, consisting of an electric heater, an integral product recovery cyclone, identified as C0, and a baghouse, identified as BH14, to control particulate emissions, exhausting outside the building;

(i) One (1) Spray Dryer Line, identified as Spray Dryer 1, with a maximum/bottlenecked throughput capacity of 1,960 lbs dry food-grade materials/hour, and including:

(1) Two (2) Bag Dump Stations, identified as Bag Dump 1 and Bag Dump 2, constructed in 2012 and permitted in 2014, having a combined maximum throughput capacity of 2000 lbs dry food-grade materials/hour, and a total combined process weight of 5,000 lbs of wet and dry materials/hr, controlling particulate matter emissions with one (1) baghouse, identified as BH17, and exhausting outside the building;

(2) Two (2) Mix Tanks, identified as Mix Tank 1 and Mix Tank 2, constructed in 2012 and permitted in 2014, having a combined maximum throughput capacity of 2000 lbs dry food-grade materials/hour, and a total combined process weight of 5,000 lbs of wet and dry materials/hr, controlling particulate matter emissions with one (1) baghouse, identified as BH17, and exhausting outside the building;

(3) One (1) Spray Dryer, identified as Spray Dryer 1, constructed in 2011, having a maximum throughput capacity of 2,000 lbs dry food-grade materials/hour, and a total process weight of 5,000 lbs of wet and dry materials/hr, equipped with one (1) 6.4 MMBtu/hr natural gas-fired dryer with low-NOx burners, and one (1) large integral product recovery cyclone, identified as C1, controlling particulate matter emissions with one (1) baghouse, identified as BH13, and exhausting outside the building;

(4) One (1) Fluid Bed Dryer, identified as Fluid Bed Dryer, constructed in 2011 and permitted in 2014, having a combined maximum throughput capacity of 1,960 lbs dry food-grade materials/hour, and a total process weight of 4,900 lbs of wet and dry materials/hr, equipped with a small integral product recovery cyclone, identified as C2, controlling particulate matter emissions with one (1) baghouse, identified as BH18, and exhausting outside the building; and

This Fluid Bed Dryer acts as an operational bottleneck for this line, limiting material throughput to 1,960 lbs dry food-grade materials/hour.

(5) One (1) packaging station docking station, controlling particulate matter emissions with one (1) baghouse, identified as BH13, and exhausting outside the building.

(j) One (1) Milling Line, identified as Grinding Mill 1, including the following:

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

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

(3) One (1) receiving bin, identified as Large Receiving Bin, constructed in 2013, with a maximum capacity of 1,500 lbs dry food grade materials, equipped with a baghouse, identified as BH16, to control particulate matter emissions, and exhausting outside the building; and

(4) One (1) packaging station docking station, controlling particulate matter emissions with one (1) baghouse, identified as BH19, and exhausting inside the building.

Insignificant Activities

(c) Fourteen (14) moveable final product packaging stations, as follows:

(1) one (1) moveable packaging station, identified as 032, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(2) one (1) moveable packaging station, identified as 035, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(3) one (1) moveable packaging station, identified as 051, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(4) one (1) moveable packaging station, identified as 054, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(5) one (1) moveable packaging station, identified as 062, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(6) one (1) moveable packaging station, identified as 063, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(7) one (1) moveable packaging station, identified as 064, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(8) one (1) moveable packaging station, identified as 066, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(9) one (1) moveable packaging station, identified as 067, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(10) one (1) moveable packaging station, identified as 068, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(11) one (1) moveable packaging station, identified as 069, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(12) one (1) moveable packaging station, identified as 00166, constructed in 2013, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(13) one (1) moveable packaging station, identified as 00170, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(14) one (1) moveable packaging station, identified as 00172, constructed in 2011, with a maximum throughput capacity of 2,000 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

Note: Each of the above-listed moveable packaging stations may be moved throughout the plant and are connected to a given line, as needed, as appropriate to the packaging requirements for the order being filled.

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

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

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

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (PSD), and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable, PM, PM10, and PM2.5 emissions from the Blend Rooms, Re-Pack Rooms, Bulk Loadout, Rail/Truck Unloading, Baler, the Spray Dryer, the Grinding Mill Receiving Bins, , and associated docking stations shall not exceed the emission limits listed in the table below:

Unit	Control Device	PM/PM10/PM2.5 Emission Limit (lbs/hr)
Blend Room 1	BH1	1.245
Blend Room 1 docking station	BH2	1.245
Blend Room 2	BH3	1.245
Blend Room 2 docking station	BH4	1.245
Re-Pack Room 3	BH5	1.245
Re-Pack Room 3 docking station	BH5	1.245
Re-Pack Room 2	BH7	1.245
Re-Pack Room 2 docking station	BH7	1.245
Bulk Loadout	BH9	1.245
Bulk Loadout docking station	BH10	1.245
Rail/Truck Unloading	BH11	1.245
Rail/Truck Unloading docking station	BV1	0.343
Baler	BH12	1.245
Spray Dryer 1 - Spray Dryer & docking station	BH13	0.080
Pilot Spray Dryer	BH14	0.009
Grinding Mill 1 - Small Receiving Bin	BH15	0.042
Grinding Mill 1 - Large Receiving Bin and Grinding Mill	BH16	0.943

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

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

D.1.2 Particulate Emission Limitations [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable, PM, PM10, and PM2.5 emissions from the Spray Dryer 1, Bag Dump & Mix Tanks, and Fluid Bed Dryer, and the Grinding Mill 1 docking station shall not exceed the emission limits listed in the table below:

Unit	Control Device	PM/PM10/PM2.5 Emission Limit (lbs/hr)
Spray Dryer 1 - Bag Dump & Mix Tanks	BH17	1.245
Spray Dryer 1 - Fluid Bed Dryer	BH18	0.861
Grinding Mill 1 - docking station	BH19	0.078

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

D.1.3 Particulate Emissions Limitations.for Manufacturing Processes [326 IAC 6-3-2]

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

Process (Control Device)	Maximum Process Weight Rate (tons/hr)	326 IAC 6-3-2 Allowable Particulate Emissions (lbs/hr)
Blend Room 1 (BH1)	3.13	8.81
Blend Room 1 docking station (BH2)	3.13	8.81
Blend Room 2 (BH3)	3.13	8.81
Blend Room 2 docking station (BH4)	3.13	8.81
Re-Pack Room 3 (BH5)	6.25	14.00
Re-Pack Room 3 docking station (BH6)	6.25	14.00
Re-Pack Room 2 (BH7)	6.25	14.00
Re-Pack Room 2 docking station (BH8)	6.25	14.00
Bulk Loadout (BH9)	5.00	12.05
Bulk Loadout docking station (BH10)	5.00	12.05
Rail/Truck Unloading (BH11)	5.00	12.05
Rail/Truck Unloading docking station (BV1)	5.00	12.05
Baler (BH12)	6.25	14.00
Spray Dryer 1 - Spray Dryer & docking station (BH13)	2.50	7.58
Pilot Spray Dryer (BH14)	0.03	0.551
Grinding Mill 1 - Small Receiving Bin (BH15)	0.75	3.38
Grinding Mill 1 - Large Receiving Bin and Grinding Mill (BH16)	0.75	3.38
Spray Dryer 1 - Bag Dump & Mix Tanks (BH17)	2.50	7.58
Spray Dryer 1 - Fluid Bed Dryer (BH18)	2.45	7.47
Grinding Mill 1 - docking station (BH19)	0.75	3.38

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

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

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

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

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

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

Compliance Determination Requirements

D.1.5 Particulate Control

(a) In order to comply with Conditions D.1.1, D.1.2, and D.1.3, each of the following emission units shall be controlled at all times by the associated baghouses listed below at all times that the associated processes are in operation:

Process	Baghouse
Blend Room 1	BH1 and BH2
Blend Room 2	BH3 and BH4
Re-Pack Room 3	BH5 and BH6
Re-Pack Room 2	BH7 and BH8
Bulk Loadout	BH9 and BH10

Process	Baghouse
Rail/Truck Unloading	BV1 and BH11
Baler	BH12
Pilot Spray Dryer	BH14
Spray Dryer 1 Line	BH13, BH17, and BH18
Grinding Mill 1 Line	BH15, BH16, and BH19

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

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.1.2 and D.1.3, the Permittee shall perform PM, PM10, and PM2.5 testing of the baghouse (BH13), controlling particulate emissions from the Spray Dryer 1 - Spray Dryer & docking station, not later than 180 days after issuance of Significant Permit Revision No. 109-34458-00062, utilizing methods approved by the Commissioner.

(b) In order to demonstrate compliance with Conditions D.1.2 and D.1.3, the Permittee shall perform PM, PM10, and PM2.5 testing of the baghouse (BH18), controlling particulate emissions from the Spray Dryer 1 Fluid Bed Dryer, not later than 180 days after startup, utilizing methods approved by the Commissioner.

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

(a) Visible emission notations from the baghouses stack exhausts BH13, BH14, BH15, BH16, BH17, and BH18, shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

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

D.1.8 Parametric Monitoring

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

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

D.1.9 Baghouse Inspections

(a) An inspection shall be performed semiannually of internally exhausting baghouses BH1 and BH2 controlling particulate emissions from Blend Room 1;

(b) An inspection shall be performed semiannually of internally exhausting baghouses BH3 and BH4 controlling particulate emissions from Blend Room 2;

(c) An inspection shall be performed semiannually of internally exhausting baghouses BH5 and BH6 controlling particulate emissions from Re-Pack Room 3;

(d) An inspection shall be performed semiannually of internally exhausting baghouses BH7 and BH8 controlling particulate emissions from Re-Pack Room 2;

(e) An inspection shall be performed semiannually of internally exhausting baghouses BH9 and BH10 controlling particulate emissions from Bulk Loadout;

(f) An inspection shall be performed semiannually of internally exhausting baghouses BV1 and BH11 controlling particulate emissions from Rail/Truck Unloading;

(g) An inspection shall be performed semiannually of internally exhausting baghouse BH12 controlling particulate emissions from the Baler; and

(h) An inspection shall be performed semiannually of internally exhausting baghouse BH19 controlling particulate emissions from the Grinding Mill 1 - packaging station docking station;

Baghouse maintenance, including replacement of defective bags, shall be implemented as needed to ensure proper function of the control device(s). Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.10 Broken or Failed Bag Detection

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

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies

as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.1.11 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the baghouses exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of the visible emission notation (e.g., the process did not operate that day).

(b) To document the compliance status with Condition D.1.8(a), the Permittee shall maintain daily records of the pressure drop across the baghouse (BH13) used in conjunction with the Spray Dryer 1 spray dryer & docking station during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).

(c) To document the compliance status with Condition D.1.8(b), the Permittee shall maintain daily records of the pressure drop across the baghouse (BH19) used in conjunction with the Grinding Mill 1 docking station during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).

(d) To document the compliance status with Conditions D.1.9(a) through (h), the Permittee shall maintain records of the results of the semiannual inspections required under Conditions D.1.9(a) through (h); and

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

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

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

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

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

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

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

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

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

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

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

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

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

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

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

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

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

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

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

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

PacMoore Process Technologies
100 PacMoore Pkwy
Mooresville, Indiana 46158

Affidavit of Construction

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

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

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

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

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

5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature_____

Date_____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana

on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature_____

Name_____ (typed or printed)

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	PacMoore Process Technologies
Source Location:	100 PacMoore Pkwy, Mooresville, IN 46158
County:	Morgan
SIC Code:	2099 (Food Preparations, Not Elsewhere Classified)
Operation Permit No.:	F 109-30338-00062
Operation Permit Issuance Date:	July 29, 2011
Significant Permit Revision No.:	109-34458-00062
Permit Reviewer:	Hannah L. Desrosiers

On April 21, 2014, the Office of Air Quality (OAQ) received an application from PacMoore Process Technologies related to a modification to an existing stationary dry food grade materials manufacturing facility.

Existing Approvals

The source was issued FESOP No. 109-30338-00062 on July 29, 2011. The source has since received the following approvals:

(a) Administrative Amendment No. 109-33076-00062, issued on June 11, 2013; and

(b) Significant Permit Revision No. 109-33209-00062, issued on July 25, 2013.

County Attainment Status

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

Pollutant	Designation
SO_2	Non-attainment effective October 4, 2013, for the Clay Township and Washington Township. Better than national standards for the remainder of county.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Attainment effective July 11, 2013, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	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 1-4-56; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA; filed May 14, 2008, 2:36 p.m.: 20080611-IR-326070840FRA; 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. Morgan County, Clay 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) PM2.5

Morgan County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Note: Morgan County was designated as nonattainment for the annual PM2.5 standard, effective April 5, 2005. Morgan County was later redesignated as attainment for the annual PM2.5 standard on July 11, 2013. On March 11, 2011, PacMoore Process Technologies was issued a new source construction FESOP. At that time, PacMoore Process Technologies elected to accept enforceable limits on PM2.5, to remain a minor source under 326 IAC 2-1.1-5 (Nonattainment New Source Review). Pursuant to the anti-backsliding provision of the Clean Air Act (CAA) (Section 172(e)), limitations established to render 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable under an area's previous nonattainment designation cannot be relaxed if the area becomes attainment. Therefore, the existing PM2.5 emission limits are being maintained in the permit.

(c) SO2

U.S. EPA, in the Federal Register Notice 78 FR 47191 dated August 5, 2013, has designated Morgan County, Clay Township, as nonattainment for SO_2. Therefore, SO_2 emissions were reviewed pursuant to the requirements of Emission Offset, 326 IAC 2-3.

(d) Lead

Morgan County, Clay Township, has been classified as attainment or unclassifiable in Indiana for Lead. Therefore, Lead emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(e) Other Criteria Pollutants

Morgan County, Clay 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.

Status of the Existing Source

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

This PTE table is taken directly from page 5 of 12 of the TSD for Significant Permit Revision No. 109-33209-00062, issued on July 25, 2013.

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

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".
**The 100,000 CO_2e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

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

(b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3) and 326 IAC 2-1.1-5 (Nonattainment New Source Review), because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.

Note: Morgan County was designated as nonattainment for the annual PM2.5 standard, effective April 5, 2005. Morgan County was later redesignated as attainment for the annual PM2.5 standard on July 11, 2013. On March 11, 2011, PacMoore Process Technologies was issued a new source construction FESOP. At that time, PacMoore Process Technologies elected to accept enforceable limits on PM2.5, to remain a minor source under 326 IAC 2-1.1-5 (Nonattainment New Source Review). Pursuant to the anti-backsliding provision of the Clean Air Act (CAA) (Section 172(e)), limitations established to render 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable under an area's previous nonattainment designation cannot be relaxed if the area becomes attainment. Therefore, the existing PM2.5 emission limits are being maintained in the permit.

(c) The source wide GHG emissions are less than one hundred thousand (<100,000) tons of CO_2 equivalent (CO_2e) emissions per year. GHG emissions do not affect the source PSD status.

(d) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs 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. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by PacMoore Process Technologies on April 21, 2014, relating to the construction of a new baghouse, two (2) bag dumping stations, two (2) mix tanks, and a fluid bed dryer. Additionally, the company is requesting that its existing packaging stations be established as moveable units, which could be located at any given line on a case by case as needed basis, and finally, a number of administrative corrections have been requested to clarify the operations at this existing source.

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

(a) One (1) packaging station docking station, controlling particulate matter emissions with one (1) baghouse, identified as BH19, and exhausting inside the building.

The following is a list of the modified emission unit(s) and pollution control device(s):

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

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

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

(d) One (1) Baler, identified as Baler, constructed in 2006 and permitted in 2011, to compact a maximum capacity of 12,500 lbs of used product bags/hour, equipped with a baghouse, identified as BH12, to control particulate matter emissions, and exhausting inside the building;

(e) One (1) Spray Dryer, identified as Spray Dryer 1, constructed in 2011, having a maximum throughput capacity of 2,000 lbs dry food-grade materials/hour, and a total process weight of 5,000 lbs of wet and dry materials/hr, equipped with one (1) 6.4 MMBtu/hr natural gas-fired dryer with low-NOx burners, and one (1) large integral product recovery cyclone, identified as C1, controlling particulate matter emissions with one (1) baghouse, identified as BH13, and exhausting outside the building;

The following is a list of the unpermitted emission units:

(a) One (1) Spray Dryer Line, identified as Spray Dryer 1, with a maximum/bottlenecked throughput capacity of 1,960 lbs dry food-grade materials/hour, and including:

(1) Two (2) Bag Dump Stations, identified as Bag Dump 1 and Bag Dump 2, constructed in 2012 and permitted in 2014, having a combined maximum throughput capacity of 2000 lbs dry food-grade materials/hour, and a total combined process weight of 5,000 lbs of wet and dry materials/hr, controlling particulate matter emissions with one (1) baghouse, identified as BH17, and exhausting outside the building;

(2) Two (2) Mix Tanks, identified as Mix Tank 1 and Mix Tank 2, constructed in 2012 and permitted in 2014, having a combined maximum throughput capacity of 2000 lbs dry food-grade materials/hour, and a total combined process weight of 5,000 lbs of wet and dry materials/hr, controlling particulate matter emissions with one (1) baghouse, identified as BH17, and exhausting outside the building;

(3) One (1) Fluid Bed Dryer, identified as Fluid Bed Dryer, constructed in 2011 and permitted in 2014, having a combined maximum throughput capacity of 1,960 lbs dry food-grade materials/hour, and a total process weight of 4,900 lbs of wet and dry materials/hr, equipped with a small integral product recovery cyclone, identified as C2, controlling particulate matter emissions with one (1) baghouse, identified as BH18, and exhausting outside the building; and

This Fluid Bed Dryer acts as an operational bottleneck for this line, limiting material throughput to 1,960 lbs dry food-grade materials/hour.

(4) One (1) packaging station docking station, controlling particulate matter emissions with one (1) baghouse, identified as BH13, and exhausting outside the building.

The following is a list of insignificant activities:

(1) Package marking (LP-1) with potential VOC uncontrolled emissions from ink usage meeting the exemption levels under 326 IAC 2-7-1(21)(A) and (B).

"Integral Part of the Process" Determination

The Permittee has submitted the following information to justify why the cyclones serving the Spray Dryer 1 - Fluid Bed Dryer, Spray Dryer 1 - Spray Dryer & Docking Station, and the Pilot Spray Dryer, should be considered integral parts of the Spray Dryer 1 and the Pilot Spray Dryer Process Lines:

(1) The Control Equipment Serves a Primary Purpose Other than Pollution Control
The basic principle of operation for a spray dryer or fluid bed dryer involves the blending of solids with a liquid and passing this slurry through a hot air stream where the mixture is heated until the liquid is evaporated. The air stream is travelling at high velocity and the Best Available Technology (BAT) to separate the product from the air stream is the use of a cyclone which provides the separation of the solids using centrifugal force where the particles impact the walls of the cyclone and gravity allows the particles to drop out the bottom of the cyclone while the fines are discharged from the top of the cyclone and on to a pollution control device. In this case, the pollution control device is a baghouse on all three systems. In the spray dryer 1 line, after the spray dryer, the fluid bed dryer uses another air stream of hot air to further dry the product to meet required specifications and once again this air stream carries the product into a cyclone where the separation of the product takes place and the remaining fines in the air stream are sent to a baghouse.

(2) The Process Can Not Operate Without the Control Equipment
The cyclones recover 98% of the product that passes through them based on the design by GEA Process Engineering who designed the Spray Dryers and the cyclones for the Spray Dryers and the Fluid Bed Dryer. Without the use of these cyclones, there would be no product recovery and the product would be sent on to the pollution control devices (baghouses) where there is a high potential for contaminants to enter the product.

IDEM, OAQ has evaluated the information submitted and agrees that the cyclones serving the Spray Dryer 1 - Fluid Bed Dryer, Spray Dryer 1 - Spray Dryer & Docking Station, and the Pilot Spray Dryer, should be considered an integral part of the Spray Dryer 1 and the Pilot Spray Dryer Process Lines. This determination is based on the fact that each cyclone will be used exclusively for product recovery (i.e., functions as process equipment) and each cyclone will be connected to a baghouse for particulate control. Therefore, the potential to emit particulates (PM, PM10, and PM2.5) from the Spray Dryer 1 - Fluid Bed Dryer, Spray Dryer 1 - Spray Dryer & Docking Station, and the Pilot Spray Dryer were calculated after consideration of the cyclones serving the Spray Dryer 1 - Fluid Bed Dryer, Spray Dryer 1 - Spray Dryer & Docking Station, and the Pilot Spray Dryer, for purposes of determining permitting level and 326 IAC 6-3 applicability. However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD), potential particulate (PM, PM10, and PM2.5) emissions from the Spray Dryer 1 - Fluid Bed Dryer, Spray Dryer 1 - Spray Dryer & Docking Station, and the Pilot Spray Dryer were calculated before consideration of the cyclones serving the Spray Dryer 1 - Fluid Bed Dryer, Spray Dryer 1 - Spray Dryer & Docking Station, and the Pilot Spray Dryer. Operating conditions in the proposed permit will specify that the cyclones serving the Spray Dryer 1 - Fluid Bed Dryer, Spray Dryer 1 - Spray Dryer & Docking Station, and the Pilot Spray Dryer shall operate at all times when the Spray Dryer 1 - Fluid Bed Dryer, Spray Dryer 1 - Spray Dryer & Docking Station, and/or the Pilot Spray Dryer are in operation, as applicable.

Enforcement Issues

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

Process Bottleneck

According to PacMoore Process Technologies, the Fluid Bed Dryer acts as an operational bottleneck for the Spray Dryer Line, limiting material throughput to 1,960 lbs dry food-grade materials/hour.

Emission Calculations

See Appendix A.1 and Appendix A.2 of this TSD for detailed emission calculations.

The following applies as a result of this revision:

1. On Friday, November 29, 2013, as published in 70 FR 230, EPA amended the Greenhouse Gas Reporting Rule's table of global warming potentials (GWPs) to revise the values for certain greenhouse gases. These changes became effective on January 1, 2014. Therefore, IDEM has revised the emission calculations and updated the permit accordingly.

   Additionally, the emissions calculations were updated to include greenhouse gases (GHGs) emissions from the hot oil heater process. This has resulted in a slight change to the "worst case" PTE from the boiler/water heater. *See the Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year) table below*.

   These are Title I changes.

2. The potential to emit particulates (PM, PM10, and PM2.5) from the Spray Dryer 1 - Fluid Bed Dryer, Spray Dryer 1 - Spray Dryer & Docking Station, and the Pilot Spray Dryer were calculated before consideration of the cyclones serving the Spray Dryer 1 - Fluid Bed Dryer, Spray Dryer 1 - Spray Dryer & Docking Station, and the Pilot Spray Dryer, for purposes of determining Prevention of Significant Deterioration (PSD) applicability. However, for purposes of determining permitting level and 326 IAC 6-3 applicability the potential particulate (PM, PM10, and PM2.5) emissions from the Spray Dryer 1 - Fluid Bed Dryer, Spray Dryer 1 - Spray Dryer & Docking Station, and the Pilot Spray Dryer were

calculated after consideration of the cyclones serving the Spray Dryer 1 - Fluid Bed Dryer, Spray Dryer 1 - Spray Dryer & Docking Station, and the Pilot Spray Dryer. *See the "Integral Part of the Process" Determination" Section, above, for more details.*

These are Title I changes.

3. IDEM has determined that the moveable packaging stations are not stand alone emission units, since it is only when a packaging station is connected to a docking station that it receives materials and gains the potential to emit. The potential to emit (PTE) from each docking station/packaging station unit has been determined based on the docking station baghouse characteristics, such as air flow rate and outlet grain loading.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)									
	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO_2e	Total HAPs	Worst Single HAP
Spray Dryer 1 - Bag Dump & Mix Tanks (BH17)	75.09	75.09	75.09	0	0	0	0	0	0	NA
Spray Dryer 1 - Fluid Bed Dryer (BH18)	171.70*	171.70*	171.70*	0	0	0	0	0	0	NA
Grinding Mill 1 - Packaging Station Docking Station (BH19)	46.93	46.93	46.93	0	0	0	0	0	0	NA
Package Marking Ink (LP-1)	0	0	0	0	0	$7.1E^{-03}$	0	0	negl.	negl.
Total PTE of Proposed Revision	**293.71**	**293.71**	**293.71**	**0**	**0**	$7.1E^{-03}$	**0**	**0**	**0**	**NA**

NA = not applicable
*PTE (unlimited/controlled) after consideration of integral product recovery cyclone for purposes of determining permit level under 326 IAC 2-8-11.1 (Permit Revisions).

This FESOP is being revised through a FESOP Significant Permit Revision for the following reasons:

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

2. Pursuant to 326 IAC 2-8-11.1(f), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the addition of emission limitations to preserve the FESOP Status of this source.

PTE of the Entire Source After Issuance of the FESOP Revision

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

	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)									
Process/ Emission Unit	PM	PM10*	PM2.5*	SO_2	NOx	VOC	CO	GHGs as CO_2e**	Total HAPs	Worst Single HAP
Boiler/Water Heater	$7.0E^{-03}$	0.03	0.03	2.2^{E-03}	0.37	0.02	0.31	446	7.0^{E-03}	6.6^{E-03} (Hexane)
Spray Dryer (combustion)	0.05	0.21	0.21	0.02	2.75	0.15	2.31	3,31**7**~~8~~	0.05	0.05 (Hexane)
Blend Room**s** 1 & 2, Re-pack Room**s** 3 & 2, Bulk Loadout, Rail/Truck, Ba~~i~~ler, Pilot Spray Dryer, ~~and~~ Spray Dryer 1 **Line, and Grinding Mill 1 Line**.**	**80.85** ~~67.34~~	**80.85** ~~67.34~~	**80.85** ~~67.34~~	0.0	0.0	0.0	0.0	0.0	0.0	0.0
~~Receiving Bins~~	~~4.31~~	~~4.31~~	~~4.31~~	~~0.0~~	~~0.0~~	~~0.0~~	~~0.0~~	~~0.0~~	~~0.0~~	~~0.0~~
Package Marking Ink (LP-1)	**0**	**0**	**0**	0	0	$7.1E^{-03}$	0	0	negl.	negl.
Total PTE of Non-fugitive Emissions	**80.91** ~~71.71~~	**81.09** ~~71.89~~	**81.09** ~~71.89~~	0.02	3.12	0.17	2.62	3,76**34**	0.06	0.06 (Hexane)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds***	250	250	~~NA~~ **250**	~~250~~ **NA**	250	250	250	NA	NA	NA
Subject to Regulation	NA	NA	NA	NA	NA	NA	NA	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds****	NA	NA	~~100~~ **NA**	~~NA~~ **100**	NA	NA	NA	NA	NA	NA
Fugitive Emissions Paved Roads	0.43	0.09	0.02	0.00	0.00	0.00	0.00	0.00	0.00	NA

NA = not applicable negl. = negligible
*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
**The Grinding Mill 1 Line includes the Receiving Bins. See the "Description of Proposed Revision" Section Above.
***The 100,000 CO_2e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.
****Morgan County was designated as nonattainment for the annual PM2.5 standard, effective April 5, 2005. Morgan County was later redesignated as attainment for the annual PM2.5 standard on July 11, 2013. On March 11, 2011, PacMoore Process Technologies was issued a new source construction FESOP. At that time, PacMoore Process Technologies elected to accept enforceable limits on PM2.5, to remain a minor source under 326 IAC 2-1.1-5 (Nonattainment New Source Review). Pursuant to the anti-backsliding provision of the Clean Air Act (CAA) (Section 172(e)), limitations established to render 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable under an area's previous nonattainment designation cannot be relaxed if the area becomes attainment. Therefore, the existing PM2.5 emission limits are being maintained in the permit.

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

is made practically enforceable in the permit. *(Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted).*

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of the FESOP Revision (tons/year)									
	PM	**PM10***	**PM2.5***	**SO_2**	**NOx**	**VOC**	**CO**	**GHGs as CO_2e*** **	**Total HAPs**	**Worst Single HAP**
Boiler/Water Heater	$7.0E^{-03}$	0.03	0.03	2.2^{E-03}	0.37	0.02	0.31	446	7.0^{E-03}	6.6^{E-03} (Hexane)
Spray Dryer (combustion)	0.05	0.21	0.21	0.02	2.75	0.15	2.31	3,317	0.05	0.05 (Hexane)
Blend Rooms 1 & 2, Re-pack Rooms 3 & 2, Bulk Loadout, Rail/Truck, Baler, Pilot Spray Dryer, Spray Dryer 1 Line, and Grinding Mill 1 Line**.	80.85	80.85	80.85	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Package Marking Ink (LP-1)	**0**	**0**	**0**	0	0	$7.1E^{-03}$	0	0	negl.	negl.
Total PTE of Non-fugitive Emissions	**80.91**	**81.09**	**81.09**	**0.02**	**3.12**	**0.17**	**2.62**	**3,763**	**0.06**	**0.06 (Hexane)**
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	NA	250	250	250	NA	NA	NA
Subject to Regulation	NA	NA	NA	NA	NA	NA	NA	100,000	NA	NA
**** Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	100	NA	NA	NA	NA	NA	NA
Fugitive Emissions Paved Roads	0.09	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	NA

NA = not applicable negl. = negligible
*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
**The Grinding Mill 1 Line includes the Receiving Bins. See the "Description of Proposed Revision" Section Above.
***The 100,000 CO_2e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.
****Morgan County was designated as nonattainment for the annual PM2.5 standard, effective April 5, 2005. Morgan County was later redesignated as attainment for the annual PM2.5 standard on July 11, 2013. On March 11, 2011, PacMoore Process Technologies was issued a new source construction FESOP. At that time, PacMoore Process Technologies elected to accept enforceable limits on PM2.5, to remain a minor source under 326 IAC 2-1.1-5 (Nonattainment New Source Review). Pursuant to the anti-backsliding provision of the Clean Air Act (CAA) (Section 172(e)), limitations established to render 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable under an area's previous nonattainment designation cannot be relaxed if the area becomes attainment. Therefore, the existing PM2.5 emission limits are being maintained in the permit.

PSD Minor, Emission Offset Minor, and FESOP Status

This modification to an existing PSD minor stationary source will not change the PSD minor status, because:

(1) The potential to emit of all PSD regulated pollutants, excluding GHGs, from the entire source will continue to be less than the PSD major source threshold levels.

(2) The GHG emissions from the entire source will continue to be less than one hundred thousand (100,000) tons of CO_2 equivalent (CO_2e) emissions per year

Therefore, pursuant to 326 IAC 2-2, the GHG emissions are not subject to regulation and the PSD requirements do not apply.

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

Note: Morgan County was designated as nonattainment for the annual PM2.5 standard, effective April 5, 2005. Morgan County was later redesignated as attainment for the annual PM2.5 standard on July 11, 2013. On March 11, 2011, PacMoore Process Technologies was issued a new source construction FESOP. At that time, PacMoore Process Technologies elected to accept enforceable limits on PM2.5, to remain a minor source under 326 IAC 2-1.1-5 (Nonattainment New Source Review). Pursuant to the anti-backsliding provision of the Clean Air Act (CAA) (Section 172(e)), limitations established to render 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable under an area's previous nonattainment designation cannot be relaxed if the area becomes attainment. Therefore, the existing PM2.5 emission limits are being maintained in the permit.

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. In addition, the potential to emit GHGs as CO2e are less than 100,000 tons per year, and 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 the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

This existing source has accepted the following federally enforceable limits:

(1) PM

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

Unit	Control Device	PM Emission Limit (lbs/hr)	Limit - Existing, New, or Modified
Blend Room 1	BH1	1.245	existing
Blend Room 1 docking station	BH2	1.245	existing
Blend Room 2	BH3	1.245	existing
Blend Room 2 docking station	BH4	1.245	existing
Re-Pack Room 3	BH5	1.245	existing
Re-Pack Room 3 docking station	BH5	1.245	existing
Re-Pack Room 2	BH7	1.245	existing
Re-Pack Room 2 docking station	BH7	1.245	existing
Bulk Loadout	BH9	1.245	existing
Bulk Loadout docking station	BH10	1.245	existing
Rail/Truck Unloading	BH11	1.245	existing
Rail/Truck Unloading docking station	BV1	0.343	existing
Baler	BH12	1.245	existing
Spray Dryer 1 spray dryer & docking station	BH13	0.080	modified
Pilot Spray Dryer	BH14	0.009	modified
Grinding Mill 1 Small Receiving Bin	BH15	0.042	existing
Grinding Mill 1 Large Receiving Bin and Grinding Mill	BH16	0.943	existing
Spray Dryer 1 Bag Dump & Mix Tanks	**BH17**	**1.245**	**new**
Spray Dryer 1 Fluid Bed Dryer	**BH18**	**0.007**	**new**
Grinding Mill 1 docking station	**BH19**	**0.778**	**new**

The addition of new emission limits is a Title I change.

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.

(2) Criteria Pollutants - PM10 and PM2.5

(A) In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable, the source shall comply with the following limits:

Unit	Control Device	PM10/PM2.5 Emission Limit (lbs/hr)
Blend Room 1	BH1	1.245
Blend Room 1 docking station	BH2	1.245
Blend Room 2	BH3	1.245
Blend Room 2 docking station	BH4	1.245
Re-Pack Room 3	BH5	1.245
Re-Pack Room 3 docking station	BH5	1.245
Re-Pack Room 2	BH7	1.245
Re-Pack Room 2 docking station	BH7	1.245
Bulk Loadout	BH9	1.245
Bulk Loadout docking station	BH10	1.245
Rail/Truck Unloading docking station	BH11	1.245
Rail/Truck Unloading	BV1	0.343
Baler	BH12	1.245
Grinding Mill 1 **-** Small Receiving Bin	BH15	0.042
Grinding Mill 1 **-** Large Receiving Bin and Grinding Mill	BH16	0.943

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

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

These are existing limits for this source.

(B) In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable, the source shall comply with the following limits:

Unit	Control Device	PM10/PM2.5 Emission Limit (lbs/hr)	Limit - Existing, New, or Modified
Spray Dryer 1 - Spray Dryer & docking station	BH13	0.080	modified
Pilot Spray Dryer	BH14	0.009	modified

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 emissions of PM10 and PM2.5 to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

These are revised emission limits for this source. This is a Title I change.

(C) In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable, the source shall comply with the following limits:

Unit	Control Device	PM10/PM2.5 Emission Limit (lbs/hr)
Spray Dryer 1 **-** Bag Dump & Mix Tanks	BH17	1.245
Spray Dryer 1 **-** Fluid Bed Dryer	BH18	0.078
Grinding Mill 1 **-** docking station	BH19	0.778

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 emissions of PM10 and PM2.5 to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

These are new emission limits for this source. This is a Title I change.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60, Subpart DD (326 IAC 12), are not included for this proposed revision, since this source is not considered a grain elevator as defined in section 60.301 of Subpart DD. This source operates a dry food grade manufacturing process to sift, blend, dry, extrude, and repackage ingredients and products such as starch, protein, gum, and fiber for the food, retail, and pharmaceutical markets.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

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

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

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

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

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

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

(a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). *See the "PTE of the Entire Source After Issuance of the FESOP Revision" Section above.*

(b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because:

(1) The potential to emit of all PSD regulated pollutants, excluding GHGs, from the entire source will continue to be less than the PSD major source threshold levels.

(2) The GHG emissions from the entire source will continue to be less than one hundred thousand (100,000) tons of CO_2 equivalent (CO_2e) emissions per year

Therefore, pursuant to 326 IAC 2-2, the GHG emissions are not subject to regulation and the PSD requirements do not apply. *See the "PTE of the Entire Source After Issuance of the FESOP Revision" Section above*.

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

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

(e) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the *(new/modified unit(s))* 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.

(f) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, pursuant to 326 IAC 2-6-1(b), the source is only subject to additional information requests as provided for in 326 IAC 2-6-5.

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

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

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

(l) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are applicable to each of the below-listed emission units, since each has potential particulate emissions greater than five hundred fifty-one thousandths (0.551) pound per hour. Therefore, pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate shall not exceed the corresponding pound per hour limitations listed in the table below:

Process (Control Device)	Maximum Process Weight Rate (tons/hr)	326 IAC 6-3-2 Allowable Particulate Emissions (lbs/hr)	Limit - Existing or New
Blend Room 1 (BH1)	3.13	8.81	existing
Blend Room 1 docking station (BH2)	3.13	8.81	existing
Blend Room 2 (BH3)	3.13	8.81	existing
Blend Room 2 docking station (BH4)	3.13	8.81	existing
Re-Pack Room 3 (BH5)	6.25	14.00	existing
Re-Pack Room 3 docking station (BH6)	6.25	14.00	existing
Re-Pack Room 2 (BH7)	6.25	14.00	existing
Re-Pack Room 2 docking station (BH8)	6.25	14.00	existing
Bulk Loadout (BH9)	5.00	12.05	existing
Bulk Loadout docking station (BH10)	5.00	12.05	existing
Rail/Truck Unloading (BH11)	5.00	12.05	existing
Rail/Truck Unloading docking station (BV1)	5.00	12.05	existing
Baler (BH12)	6.25	14.00	existing
Spray Dryer 1 **-** Spray Dryer & docking station (BH13)	2.50	7.58	existing
Pilot Spray Dryer (BH14)	0.03	0.551	existing
Grinding Mill 1 **-** Small Receiving Bin (BH15)	0.75	3.38	existing
Grinding Mill 1 **-** Large Receiving Bin and Grinding Mill (BH16)	0.75	3.38	existing
Spray Dryer 1 - Bag Dump & Mix Tanks (BH17)	**2.50**	**7.58**	**new**
Spray Dryer 1 - Fluid Bed Dryer (BH18)	**2.45**	**7.47**	**new**
Grinding Mill 1 - docking station (BH19)	**0.75**	**3.38**	**new**

The addition of new emission limits is a Title I change.

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

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

The control equipment shall be in operation at all times the associated above-listed emission unit is in operation, in order to comply with these limits.

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

(h) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The Package marking (LP-1) operation is otherwise regulated under 326 IAC 8-2-5 (Paper coating operations); therefore the requirements of 326 IAC 8-1-6 do not apply to the Package marking (LP-1) operation, and are not included in the permit.

(i) 326 IAC 8-2-5 (Paper coating operations)
Potential and actual uncontrolled VOC potential emissions from the Package marking (LP-1) operation are less than fifteen (15) pounds per day; therefore, the requirements of 326 IAC 326 IAC 8-2-5 do not apply to the Package marking (LP-1) operation, and are not included in the permit.

(j) There are no other 326 IAC 8 Rules that are applicable to the Package marking (LP-1) operation.

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

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

Compliance Determination, Monitoring and Testing Requirements

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

(1) In order to comply with the PM, PM10, and PM2.5 limitations in the permit, the baghouse (BH17) serving the Spray Dryer 1 - Bag Dump & Mix Tank stations shall be in operation and control emissions from the Bag Dump & Mix Tank stations at all times when any of the Bag Dump and Mix Tank stations are in operation.

(2) In order to comply with the PM, PM10, and PM2.5 limitations in the permit, the baghouse (BH18) serving the Spray Dryer 1 - Fluid Bed Dryer shall be in operation and control emissions from the Fluid Bed Dryer at all times when the Fluid Bed Dryer is in operation.

(3) In order to comply with the PM, PM10, and PM2.5 limitations in the permit, the baghouse (BH19) serving the Grinding Mill 1 - docking station shall be in operation and control emissions from a docked moveable packaging station at all times whenever a packaging station is docked and in operation.

(b) The testing requirements applicable to this proposed revision are as follows:

Testing Requirements				
Emission Unit	**Control Device**	**Pollutant**	**Timeframe for Testing**	**Frequency of Testing**
Spray Dryer 1 - Spray Dryer & docking station (1)	Baghouse BH13	PM/PM10/PM2.5	Not later than 180 days after issuance of this revision	Once every 5 years
Spray Dryer 1 - Fluid Bed Dryer (1)	Baghouse BH18	PM/PM10/PM2.5	Not later than 180 days after issuance of this revision	Once every 5 years

(1) Post-baghouse testing is required to confirm compliance with 326 IAC 2-8 (FESOP), and the limits that render 326 IAC 2-2 (PSD), 326 IAC 2-7 (Part 70 Permit Program), and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable. The uncontrolled/ unlimited potential to emit particulate from each unit before integral product recovery cyclone (C1 & C2) is greater than 8,000 tons per year, and after cyclone is greater than 150 tons per year, well above the PSD and TV permitting thresholds, and a very high control efficiency (99.8%) is required to comply with State and Federal regulations.

(2) Testing is not included for the baghouses serving the Spray Dryer 1 - Bag Dump & Mix Tanks (BH17) since the uncontrolled/unlimited PTE from the unit is below the PSD and TV permitting thresholds (75.09 tons/yr) and a fairly low control efficiency (76.1%) is required to comply with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

(3) Testing is not included for the baghouses serving the Grinding Mill 1 - docking station (BH19), since the uncontrolled/unlimited PTE from the unit is well below the PSD and TV permitting thresholds (69.93 tons/yr) and a low control efficiency of 62.2% is required to comply with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

(c) The compliance monitoring requirements applicable to this proposed revision are as follows:

Emission Unit/Control	Operating Parameters	Frequency	Range	Excursions and Exceedances
Baghouse BH17	Visible Emissions	Once per day	Normal / Abnormal	Response Steps
Baghouse BH18	Visible Emissions	Once per day	Normal / Abnormal	Response Steps
Baghouse BH19	Inspections	Semi-annually	Normal / Abnormal	Response Steps

These monitoring conditions are necessary because the baghouses serving the Spray Dryer 1 - Bag Dump & Mix Tank stations (BH17), the Spray Dryer 1 - Fluid Bed Dryer (BH18), and the Grinding Mill 1 - docking station (BH19), each must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes), 326 IAC 2-8 (FESOP), and the limits that render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permit Program not applicable.

Note: Semiannual baghouse inspections have been added for all baghouses venting inside the building, where the control device is necessary to ensure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes), 326 IAC 2-8 (FESOP), and the limits that render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permit Program not applicable. In many cases the limits also render the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable.

No existing compliance requirements will change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in the FESOP as revised by FESOP Significant Permit Revision No. 109-33209-00062, issued on July 25, 2013.

Proposed Changes

The following changes listed below are due to the proposed revision:

1. Sections A.2 - Emission Units and Pollution Control Equipment Summary, and Section D.1 - Emissions Unit Operation Conditions have been revised to include emission unit descriptions for the Spray Dryer 1 Bag Dump & Mix Tank stations, the Spray Dryer 1 Fluid Bed Dryer, and the Grinding Mill 1 docking station;

2. Condition A.3 - Insignificant Activities has been revised to include a description of the Package Marking (LP-1) operation;

3. Condition D.1.1 - Particulate Emission Limitations has been revised to correct rule applicability references;

4. A new Condition D.1.2 - Particulate Emission Limitations has been added to include the pounds per hour PM/PM10/PM2.5 emission limitations for the Spray Dryer 1 Bag Dump & Mix Tank stations, the Spray Dryer 1 Fluid Bed Dryer, and the Grinding Mill 1 docking station;

5. Condition D.1.2 - Particulate Emission Limitations Manufacturing Processes, renumbered as D.1.3, has been revised to include the pounds per hour 326 IAC 6-3-2 Allowable Particulate Emissions for the Spray Dryer 1 Bag Dump & Mix Tank stations, the Spray Dryer 1 Fluid Bed Dryer, and the Grinding Mill 1 docking station. Additionally, the Maximum Process Weight Rate (tons/hr) and 326 IAC 6-3-2 Allowable Particulate Emissions (lbs/hr) for the Spray Dryer 1 spray dryer & docking station (BH13) have been updated;

6. Condition D.1.4 - Particulate Control, renumbered as D.1.5, has been revised to include reference to the baghouses serving the Spray Dryer 1 "Line" and the Grinding Mill 1 "Line";

7. A new Condition D.1.6 - Testing, has been added to incorporate post-baghouse testing for the Spray Dryer 1 Fluid Bed Dryer;

8. Condition D.1.5 - Visible Emission Notations, renumbered as D.1.7, has been revised to include reference to baghouses BH17 and BH18, serving the Spray Dryer 1 Bag Dump & Mix Tank stations and Spray Dryer 1 Fluid Bed Dryer ; and

9. A new Condition D.1.9 - Baghouse Inspections has been added to include the compliance monitoring requirements for baghouse BH19, serving the Grinding Mill 1 docking station;

10. Condition D.1.8 - Record Keeping Requirements, renumbered as D.1.11, has been revised to include recordkeeping of the semi-annual inspections for baghouse BH19, serving the Grinding Mill 1 docking station;

IDEM, OAQ made additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions:

1. Effective July 11, 2013, Morgan County was designated as attainment for the annual $PM_{2.5}$ standard. Additionally, effective October 4, 2013 Morgan County Clay Township was designated non-attainment for the 1 hour SO_2 standard. Condition A.1 - General Information has been revised;

2. IDEM is changing the Condition C.11 - Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin;

3. IDEM has clarified Condition C.12 - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range;

4. Throughout the permit, emission unit descriptions have been revised for clarity. Additionally, Section A.2 - Emission Units and Pollution Control Equipment Summary, and Section D.1 - Emissions Unit Operation Conditions have been revised to include separate emission unit descriptions for the existing moveable packaging stations;

5. Condition D.1.9 - Baghouse Inspections has been revised to include semi-annual baghouse inspections for each of the baghouses that vent indoors (BH1 through BH12, and BV1) to ensure compliance with the FESOP Limits contained in condition D.1.1; and

6. Condition D.1.8 - Record Keeping Requirements has been revised to include recordkeeping of the semi-annual inspections for each of the baghouses that vent indoors (BH1 through BH12, and BV1) to ensure compliance with the FESOP Limits contained in condition D.1.1;

Unaffected permit conditions have been re-numbered and the Table of Contents updated, as applicable. The Permit has been revised as follows, with deleted language shown as ~~strikeouts~~ and new language **bolded**.

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

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

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Source Location Status: ~~Nonattainment for PM2.5 standard~~
Nonattainment for SO2 standard

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

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

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

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

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

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

a docked moveable packaging station, both baghouses **exhaust inside the building**~~vent indoors~~;

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

(f) One (1) Rail/Truck Unloading, identified as Rail/Truck Unloading, constructed in 2006 **and**~~,~~ permitted in 2011, with a maximum throughput capacity of 10,000 lbs dry food-grade materials/hour, with materials conveyed to a silo equipped with a bin vent, identified as BV1, venting indoors, and materials transferred to a packaging station **docking station, equipped with a** ~~controlled by~~ a baghouse, identified as BH11, **to control particulate matter emissions from a docked moveable packaging station, and exhausting inside the building**~~venting indoors~~;

(g) One (1) Bai~~l~~er, identified as Bai~~l~~er, constructed in 2006 **and**~~,~~ permitted in 2011, to compact a maximum capacity of 12,500 lbs of used product bags**/hour, equipped** with a baghouse, identified as BH12, to control particulate matter emission**s**, **and exhausting inside the building**~~venting outdoors~~;

(h) One (1) Pilot Spray Dryer, identified as Pilot Spray Dryer, constructed in 2007 **and**~~,~~ permitted in 2011, with a maximum throughput capacity of 60 lbs dry food-grade materials/hour, consisting of an electric heater, a**n integral product recovery** cyclone ~~to collect final product~~**, identified as C0,** and a baghouse, identified as BH14**,** to control particulate emission**s**, **exhausting outside the building**~~venting outdoors~~;

(i) One (1) Spray Dryer Line, identified as Spray Dryer 1, with a maximum/bottlenecked throughput capacity of 1,960 lbs dry food-grade materials/hour, and including:

(1) Two (2) Bag Dump Stations, identified as Bag Dump 1 and Bag Dump 2, constructed in 2012 and permitted in 2014, having a combined maximum throughput capacity of 2000 lbs dry food-grade materials/hour, and a total combined process weight of 5,000 lbs of wet and dry materials/hr, controlling particulate matter emissions with one (1) baghouse, identified as BH17, and exhausting outside the building;

(2) Two (2) Mix Tanks, identified as Mix Tank 1 and Mix Tank 2, constructed in 2012 and permitted in 2014, having a combined maximum throughput capacity of 2000 lbs dry food-grade materials/hour, and a total combined process weight of 5,000 lbs of wet and dry materials/hr, controlling particulate matter emissions with one (1) baghouse, identified as BH17, and exhausting outside the building;

(~~i~~**3**) One (1) Spray Dryer, identified as Spray Dryer 1, **constructed**~~approved for construction~~ in 2011, ~~with~~ **having** a maximum throughput capacity of ~~5~~**2**,000 lbs dry food-grade materials/hour, **and a total process weight of 5,000 lbs of wet and dry materials/hr,** ~~consisting of a~~ **equipped with one (1)** 6.4 MMBtu/hr natural gas-fired dryer with low-NOx burners, **and one (1) large integral product recovery** cyclone, identified as C1, ~~to collect final product,~~ **controlling particulate matter emissions with one (1)** ~~and a~~ baghouse, identified as BH13, ~~to control particulate emissions,~~ **and exhausting outside the building**~~venting outdoors~~;

(4) One (1) Fluid Bed Dryer, identified as Fluid Bed Dryer, constructed in 2011 and permitted in 2014, having a combined maximum throughput capacity of 1,960 lbs dry food-grade materials/hour, and a total process weight of 4,900 lbs of wet and dry materials/hr, equipped with a small integral product recovery cyclone, identified as C2, controlling particulate matter emissions with one (1) baghouse, identified as BH18, and exhausting outside the building; and

This Fluid Bed Dryer acts as an operational bottleneck for this line, limiting material throughput to 1,960 lbs dry food-grade materials/hour.

(5) One (1) packaging station docking station, controlling particulate matter emissions with one (1) baghouse, identified as BH13, and exhausting outside the building.

(j) One (1) Milling Line, identified as Grinding Mill 1, including the following:

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

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

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

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

(4) One (1) packaging station docking station, controlling particulate matter emissions with one (1) baghouse, identified as BH19, and exhausting inside the building.

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

This stationary source also includes the following insignificant activities:

(a) One (1) **natural gas-fired** boiler, identified as boiler 1, constructed in 2006, permitted in 2011, with a maximum heat input capacity of 0.2 MMBtu/hr**, uncontrolled and exhausting inside the building**;

(b) One (1) **natural gas-fired** water heater, constructed in 2006, permitted in 2011, with a maximum heat input capacity of 0.66 MMBtu/hr**, uncontrolled and exhausting inside the building**; and

(c) Fourteen (14) moveable final product packaging stations, as follows:

(1) one (1) moveable packaging station, identified as 032, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse.

This unit is connected to any given line docking station on an "as needed" basis;

(2) one (1) moveable packaging station, identified as 035, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(3) one (1) moveable packaging station, identified as 051, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(4) one (1) moveable packaging station, identified as 054, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(5) one (1) moveable packaging station, identified as 062, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(6) one (1) moveable packaging station, identified as 063, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(7) one (1) moveable packaging station, identified as 064, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(8) one (1) moveable packaging station, identified as 066, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(9) one (1) moveable packaging station, identified as 067, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse.

This unit is connected to any given line docking station on an "as needed" basis;

(10) one (1) moveable packaging station, identified as 068, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(11) one (1) moveable packaging station, identified as 069, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(12) one (1) moveable packaging station, identified as 00166, constructed in 2013, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(13) one (1) moveable packaging station, identified as 00170, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(14) one (1) moveable packaging station, identified as 00172, constructed in 2011, with a maximum throughput capacity of 2,000 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

Note: Each of the above-listed moveable packaging stations may be moved throughout the plant and are connected to a given line, as needed, as appropriate to the packaging requirements for the order being filled.

(d) Package marking (LP-1) with potential VOC uncontrolled emissions from ink usage meeting the exemption levels under 326 IAC 2-7-1(21)(A) and (B).

(~~c~~**e**) Paved roads with no controls.

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

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

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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.**

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

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

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

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

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

(e) One (1) Bulk Loadout, identified as Bulk Loadout, constructed in 2006 **and**~~,~~ permitted in 2011, consisting of a sifter~~, mixer,~~ and packaging station **docking station**, with a maximum throughput

capacity of 10,000 lbs dry food-grade materials/hour**, equipped** with a baghouse, identified as BH9, to control particulate matter emissions from the sifter**,** and a baghouse, identified as BH10, to control particulate matter emissions from ~~the~~ **a docked moveable** packaging station, both baghouses **exhaust inside the building**~~vent indoors~~;

(f) One (1) Rail/Truck Unloading, identified as Rail/Truck Unloading, constructed in 2006 **and**~~,~~ permitted in 2011, with a maximum throughput capacity of 10,000 lbs dry food-grade materials/hour, with materials conveyed to a silo equipped with a bin vent, identified as BV1, venting indoors, and materials transferred to a packaging station **docking station, equipped with a** ~~controlled by~~ a baghouse, identified as BH11, **to control particulate matter emissions from a docked moveable packaging station, and exhausting inside the building**~~venting indoors~~;

(g) One (1) Ba~~i~~ler, identified as Ba~~i~~ler, constructed in 2006 **and**~~,~~ permitted in 2011, to compact a maximum capacity of 12,500 lbs of used product bags**/hour, equipped** with a baghouse, identified as BH12, to control particulate matter emission**s**, **and exhausting outside the building**~~venting outdoors~~;

(h) One (1) Pilot Spray Dryer, identified as Pilot Spray Dryer, constructed in 2007 **and**~~,~~ permitted in 2011, with a maximum throughput capacity of 60 lbs dry food-grade materials/hour, consisting of an electric heater, a**n integral product recovery** cyclone ~~to collect final product~~**, identified as C0,** and a baghouse, identified as BH14**,** to control particulate emission**s**, **exhausting outside the building**~~venting outdoors~~;

(i) One (1) Spray Dryer Line, identified as Spray Dryer 1, with a maximum/bottlenecked throughput capacity of 1,960 lbs dry food-grade materials/hour, and including:

(1) Two (2) Bag Dump Stations, identified as Bag Dump 1 and Bag Dump 2, constructed in 2012 and permitted in 2014, having a combined maximum throughput capacity of 2000 lbs dry food-grade materials/hour, and a total combined process weight of 5,000 lbs of wet and dry materials/hr, controlling particulate matter emissions with one (1) baghouse, identified as BH17, and exhausting outside the building;

(2) Two (2) Mix Tanks, identified as Mix Tank 1 and Mix Tank 2, constructed in 2012 and permitted in 2014, having a combined maximum throughput capacity of 2000 lbs dry food-grade materials/hour, and a total combined process weight of 5,000 lbs of wet and dry materials/hr, controlling particulate matter emissions with one (1) baghouse, identified as BH17, and exhausting outside the building;

(~~i~~**3**) One (1) Spray Dryer, identified as Spray Dryer 1, **constructed**~~approved for construction~~ in 2011, ~~with~~ **having** a maximum throughput capacity of ~~5~~**2**,000 lbs dry food-grade materials/hour, **and a total process weight of 5,000 lbs of wet and dry materials/hr,** ~~consisting of a~~ **equipped with one (1)** 6.4 MMBtu/hr natural gas-fired dryer with low-NOx burners, **and one (1) large integral product recovery** cyclone, identified as C1, ~~to collect final product,~~ **controlling particulate matter emissions with one (1)** ~~and a~~ baghouse, identified as BH13, ~~to control particulate emissions,~~ **and exhausting outside the building**~~venting outdoors~~;

(4) One (1) Fluid Bed Dryer, identified as Fluid Bed Dryer, constructed in 2011 and permitted in 2014, having a combined maximum throughput capacity of 1,960 lbs dry food-grade materials/hour, and a total process weight of 4,900 lbs of wet and dry materials/hr, equipped with a small integral product recovery cyclone, identified as C2, controlling particulate matter emissions with one (1) baghouse, identified as BH18, and exhausting outside the building; and

This Fluid Bed Dryer acts as an operational bottleneck for this line, limiting material throughput to 1,960 lbs dry food-grade materials/hour.

(5) One (1) packaging station docking station, controlling particulate matter emissions with baghouse BH13, and exhausting outside the building.

(j) One (1) Milling Line, identified as Grinding Mill 1, including the following:

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

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

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

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

(4) One (1) packaging station docking station, controlling particulate matter emissions baghouse BH19, and exhausting inside the building.

Insignificant Activities

(c) Fourteen (14) moveable final product packaging stations, as follows:

(1) one (1) moveable packaging station, identified as 032, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(2) one (1) moveable packaging station, identified as 035, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(3) one (1) moveable packaging station, identified as 051, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(4) one (1) moveable packaging station, identified as 054, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour,

controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(5) one (1) moveable packaging station, identified as 062, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(6) one (1) moveable packaging station, identified as 063, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(7) one (1) moveable packaging station, identified as 064, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(8) one (1) moveable packaging station, identified as 066, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(9) one (1) moveable packaging station, identified as 067, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(10) one (1) moveable packaging station, identified as 068, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(11) one (1) moveable packaging station, identified as 069, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(12) one (1) moveable packaging station, identified as 00166, constructed in 2013, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(13) one (1) moveable packaging station, identified as 00170, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse

and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

(14) one (1) moveable packaging station, identified as 00172, constructed in 2011, with a maximum throughput capacity of 2,000 lbs dry food-grade materials/hour, controlling particulate matter emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

Note: Each of the above-listed moveable packaging stations may be moved throughout the plant and are connected to a given line, as needed, as appropriate to the packaging requirements for the order being filled.

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

Pursuant to 326 IAC 2-8-4 (FESOP), and i~~I~~n order to render the requirements of **326 IAC 2-7 (Part 70 Permits),** 326 IAC 2-2 (PSD)**,** and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable ~~and pursuant to 326 IAC 2-8-4 (FESOP), the~~ PM, PM10, and PM2.5 emissions from the Blend Rooms, Re-Pack Rooms, Bulk Loadout, Rail/Truck Unloading, Ba~~i~~ler, the Spray Dryer~~s~~, the **Grinding Mill** Receiving Bins, and ~~Grinding Mill~~**, associated docking stations** shall not exceed the emission limits listed in the table below:

Unit	Control Device	PM/PM10/PM2.5 Emission Limit (lbs/hr)
Blend Room 1	BH1	1.245
Blend Room 1 **docking station**	BH2	1.245
Blend Room 2	BH3	1.245
Blend Room 2 **docking station**	BH4	1.245
Re-Pack Room 3	BH5	1.245
Re-Pack Room 3 **docking station**	BH5	1.245
Re-Pack Room 2	BH7	1.245
Re-Pack Room 2 **docking station**	BH7	1.245
Bulk Loadout	BH9	1.245
Bulk Loadout **docking station**	BH10	1.245
Rail/Truck **Unloading**	BV1	0.343
Rail/Truck **Unloading docking station**	BH11	1.245
Ba~~i~~ler	BH12	1.245
Spray Dryer 1 **- Spray Dryer & docking station**	BH13	0.~~080~~**878**
Pilot Spray Dryer	BH14	0.01**8**~~0~~
Grinding Mill 1 - Small Receiving Bin	BH15	0.042
Grinding Mill 1 - Large Receiving Bin and Grinding Mill	BH16	0.943

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D.1.2 Particulate Emission Limitations [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable, PM, PM10, and PM2.5 emissions from the Spray Dryer 1, Bag Dump & Mix Tanks, and Fluid Bed Dryer, and the Grinding Mill 1 docking station shall not exceed the emission limits listed in the table below:

Unit	Control Device	PM/PM10/PM2.5 Emission Limit (lbs/hr)
Spray Dryer 1 - Bag Dump & Mix Tanks	**BH17**	**1.245**
Spray Dryer 1 - Fluid Bed Dryer	**BH18**	**0.861**
Grinding Mill 1 - docking station	**BH19**	**0.778**

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

D.1.~~2~~**3** Particulate Emissions Limitations for Manufacturing Processes [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2, the particulate from **the** Blend Rooms, Re-Pack Rooms, Bulk Loadout, Rail/Truck Unloading, Ba~~i~~ler, the Spray Dryers, the Receiving Bins, ~~and~~ Grinding Mill**, and associated docking stations** shall be limited by the following:

Process (Control Device)	Maximum Process Weight Rate (tons/hr)	326 IAC 6-3-2 Allowable Particulate Emissions (lbs/hr)
Blend Room 1 (BH1)	3.13	8.81
Blend Room 1 **docking station (**BH2)	3.13	8.81
Blend Room 2 (BH3)	3.13	8.81
Blend Room 2 **docking station** (BH4)	3.13	8.81
Re-Pack Room 3 (BH5)	6.25	14.00
Re-Pack Room 3 **docking station** (BH6)	6.25	14.00
Re-Pack Room 2 (BH7)	6.25	14.00
Re-Pack Room 2 **docking station** (BH8)	6.25	14.00
Bulk Loadout (BH9)	5.00	12.05
Bulk Loadout **docking station** (BH10)	5.00	12.05
Rail/Truck Unloading (BH11)	5.00	12.05
Rail/Truck Unloading **docking station** (BV1)	5.00	12.05
Ba~~i~~ler (BH12)	6.25	14.00
Spray Dryer 1 **- Spray dryer & Docking station** (BH13)	2.50	7.58
Pilot Spray Dryer (BH14)	0.03	0.551
Grinding Mill 1 - Small Receiving Bin (BH15)	0.75	3.38
Grinding Mill 1 - Large Receiving Bin and Grinding Mill (BH16)	0.75	3.38
Spray Dryer 1 - Bag Dump & Mix Tanks (BH17)	**2.50**	**7.58**
Spray Dryer 1 - Fluid Bed Dryer (BH18)	**2.45**	**7.47**
Grinding Mill 1 - docking station (BH19)	**0.75**	**3.38**

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D.1.~~3~~**4** Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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D.1.~~4~~**5** Particulate Control

(a) In order to comply with Conditions D.1.1~~, and~~ D.1.2, **and D.1.3** each of the following emission units shall be controlled at all times by the associated baghouses listed below at all times that the associated processes are in operation:

Process	Baghouse
Blend Room 1	BH1 and BH2
Blend Room 2	BH3 and BH4
Re-Pack Room 3	BH5 and BH6
Re-Pack Room 2	BH7 and BH8
Bulk Loadout	BH9 and BH10
Rail/Truck Unloading	BV1 and BH11
Baler	BH12

Process	Baghouse
Pilot Spray Dryer	BH14
Spray Dryer 1 **Line**	BH13**, BH17, and BH18**
Grinding Mill 1 Line~~Small Receiving Bin~~	BH15**, BH16, and BH19**
~~Large Receiving Bin and Grinding Mill~~	~~BH16~~

******

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.1.2 and D.1.3, the Permittee shall perform PM, PM10, and PM2.5 testing of the baghouse (BH13), controlling particulate emissions from the Spray Dryer 1 - Spray Dryer & docking station, not later than 180 days after issuance of Significant Permit Revision No. 109-34458-00062, utilizing methods approved by the Commissioner.

(b) In order to demonstrate compliance with Conditions D.1.2 and D.1.3, the Permittee shall perform PM, PM10, and PM2.5 testing of the baghouse (BH18), controlling particulate emissions from the Spray Dryer 1 - Fluid Bed Dryer, not later than 180 days after startup, utilizing methods approved by the Commissioner.

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

D.1.~~5~~**7** Visible Emission Notations

(a) Visible emission notations from the baghouses stack exhausts BH13, BH14, BH15, ~~and~~ BH16**, BH17, and BH18,** shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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D.1.~~6~~**8** Parametric Monitoring

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D.1.9 Baghouse Inspections

(a) An inspection shall be performed semiannually of internally exhausting baghouses BH1 and BH2 controlling particulate emissions from Blend Room 1;

(b) An inspection shall be performed semiannually of internally exhausting baghouses BH3 and BH4 controlling particulate emissions from Blend Room 2;

(c) An inspection shall be performed semiannually of internally exhausting baghouses BH5 and BH6 controlling particulate emissions from Re-Pack Room 3;

(d) An inspection shall be performed semiannually of internally exhausting baghouses BH7 and BH8 controlling particulate emissions from Re-Pack Room 2;

(e) An inspection shall be performed semiannually of internally exhausting baghouses BH9 and BH10 controlling particulate emissions from Bulk Loadout;

(f) An inspection shall be performed semiannually of internally exhausting baghouses BV1 and BH11 controlling particulate emissions from Rail/Truck Unloading;

(g) An inspection shall be performed semiannually of internally exhausting baghouse BH12 controlling particulate emissions from the Baler; and

(h) An inspection shall be performed semiannually of internally exhausting baghouse BH19 controlling particulate emissions from the Grinding Mill 1 - packaging station docking station;

Baghouse maintenance, including replacement of defective bags, shall be implemented as needed to ensure proper function of the control device(s). Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.~~7~~**10** Broken or Failed Bag Detection

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D.1.~~8~~**11** Record Keeping Requirements

(a) To document the compliance status with Condition D.1.~~5~~**7**, the Permittee shall maintain records of visible emission notations **of the** baghouses exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of the visible emission notation (e.g., the process did not operate that day).

(b) To document the compliance status with Condition D.1.~~6~~**8(a)**, the Permittee shall maintain daily records of the pressure drop across the baghouse **(BH13)** used in conjunction with the Spray Dryer 1 **spray dryer & docking station** ~~(BH13)~~ during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).

(c) To document the compliance status with Condition D.1.8(b), the Permittee shall maintain daily records of the pressure drop across the baghouse used in conjunction with the Spray Dryer 1 (BH19) during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).

(d) To document the compliance status with Conditions D.1.9(a) through (h), the Permittee shall maintain records of the results of the semiannual inspections required under Conditions D.1.9(a) through (h); and

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

******

No other changes have been made to the permit.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 21, 2014. Additional information was received on April 25, 2014 and May 9, 2014.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 109-34458-00062. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to 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.1: Emission Summary
Entire Source Summary

Company Name: PacMoore Process Technologies
Source Address: 100 PacMoore Pkwy, Mooresville, Indiana 46158
Permit No: F109-34458-00062
Reviewer: Hannah L. Desrosiers

Uncontrolled/Unlimited Emissions											
Emission Units	**PM**	**PM10**	**PM2.5**	**SO2**	**NOx**	**VOC**	**CO**	**GHGs**	**HAPs**	**Worst Case Single HAP**	
Ducted/Ductable Emissions											
Boiler/Water heater	7.0E-03	0.03	0.03	2.2E-03	0.37	0.02	0.31	446	7.0E-03	6.6E-03	Hexane
Spray Dryer (combustion)	0.05	0.21	0.21	0.02	2.75	0.15	2.31	3,317	0.05	0.05	Hexane
Blend Rooms 1 and 2, Re-pack Rooms 3 and 2, Bulk Loadout, Rail/Truck, Baler, Pilot Spray Dryer, Spray Dryer 1 Line, and Grinding Mill 1 Line.	18,975.22	18,975.22	18,975.22	0.0	0.0	0.0	0.0	0	0.0	0.0	--
Package Marking Operation (LP-1)	0	0	0	0	0	7.1E-03	0	0	3.5E-05	1.5E-05	Chromium III
Total Non-Fugitive Emissions	**18,975.27**	**18,975.43**	**18,975.43**	**0.02**	**2.75**	**0.15**	**2.31**	**3,317**	**0.05**	**0.06**	**Hexane**
Fugitive Emissions*											
Paved Roads	0.47	0.09	0.02	0.0	0.0	0.0	0.0	0	0.0	0.0	--
Total Fugitive Emissions	**0.47**	**0.09**	**0.02**	**0.0**	**0.0**	**0.0**	**0.0**	**0**	**0.0**	**0.0**	**--**

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

* IDEM has determined the product recovery cyclones serving the Pilot Spray Dryer, Spray Dryer 1 - Spray Dryer & Docking Station, and Spray Dryer 1 - Fluid Bed Dryer, as integral to the process (see the “Integral Part of the Process” Determination Section in the TSD for further explanation), consequently, the potential to emit after controls has been used in determining the permitting level for this source. However, this integral determination does not negate any requirement for a limit to comply with 326 IAC 2-2 (Prevention of 'Significant Deterioration), as applicable, therefore, the emissions in the table above are shown before control.

Unlimited/Controlled Potential to Emit - After Product Recovery Cyclones (tons/year)											
Emission Units	**PM**	**PM10**	**PM2.5**	**SO2**	**NOx**	**VOC**	**CO**	**GHGs**	**HAPs**	**Worst Case Single HAP**	
Ducted/Ductable Emissions											
Boiler/Water heater*	7.0E-03	0.03	0.03	2.2E-03	0.37	0.02	0.31	446	7.0E-03	6.6E-03	Hexane
Spray Dryer (combustion)*	0.05	0.21	0.21	0.02	2.75	0.15	2.31	3,317	0.05	0.05	Hexane
Blend Rooms 1 and 2, Re-pack Rooms 3 and 2, Bulk Loadout, Rail/Truck, Baler, Pilot Spray Dryer, Spray Dryer Line, and Milling Line.	1,716.49	1,716.49	1,716.49	0.0	0.0	0.0	0.0	0	0.0	0.0	--
Package Marking Ink (LP-1)	0	0	0	0	0	7.1E-03	0	0	3.5E-05	1.5E-05	Chromium III
Total Non-Fugitive Emissions	**1,716.54**	**1,716.69**	**1,716.69**	**0.02**	**2.75**	**0.15**	**2.31**	**3,317**	**0.05**	**0.06**	**Hexane**
Fugitive Emissions**											
Paved Roads*	0.47	0.09	0.02	0.0	0.0	0.0	0.0	0	0.0	0.0	--
Total Fugitive Emissions	**0.47**	**0.09**	**0.02**	**0.0**	**0.0**	**0.0**	**0.0**	**0**	**0.0**	**0.0**	**--**

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

Controlled Emissions											
Emission Units	**PM**	**PM10**	**PM2.5**	**SO2**	**NOx**	**VOC**	**CO**	**GHGs**	**HAPs**	**Worst Case Single HAP**	
Ducted/Ductable Emissions											
Boiler/Water heater*	7.0E-03	0.03	0.03	2.2E-03	0.37	0.02	0.31	446	7.0E-03	6.6E-03	Hexane
Spray Dryer (combustion)*	0.05	0.21	0.21	0.02	2.75	0.15	2.31	3,317	0.05	0.05	Hexane
Blend Rooms 1 and 2, Re-pack Rooms 3 and 2, Bulk Loadout, Rail/Truck, Baler, Pilot Spray Dryer, Spray Dryer 1 Line, and Grinding Mill 1 Line.	80.85	80.85	80.85	0.0	0.0	0.0	0.0	0	0.0	0.0	--
Package Marking Ink (LP-1)	0	0	0	0	0	7.1E-03	0	0	3.5E-05	1.5E-05	Chromium III
Total Non-Fugitive Emissions	**80.91**	**81.09**	**81.09**	**0.02**	**3.12**	**0.17**	**2.62**	**3,763**	**0.06**	**0.06**	**Hexane**
Fugitive Emissions**											
Paved Roads*	0.43	0.09	0.02	0.0	0.0	0.0	0.0	0	0.0	0.0	--
Total Fugitive Emissions	**0.43**	**0.09**	**0.02**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**--**

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

Limited/Controlled Potential to Emit (tons/year)											
Emission Units	**PM**	**PM10**	**PM2.5**	**SO2**	**NOx**	**VOC**	**CO**	**GHGs**	**HAPs**	**Worst Case Single HAP**	
Ducted/Ductable Emissions											
Boiler/Water heater*	7.0E-03	0.03	0.03	2.2E-03	0.37	0.02	0.31	446	7.0E-03	6.6E-03	Hexane
Spray Dryer (combustion)*	0.05	0.21	0.21	0.02	2.75	0.15	2.31	3,317	0.05	0.05	Hexane
Blend Rooms 1 and 2, Re-pack Rooms 3 and 2, Bulk Loadout, Rail/Truck, Baler, Pilot Spray Dryer, Spray Dryer 1 Line, and Grinding Mill 1 Line.	80.85	80.85	80.85	0.0	0.0	0.0	0.0	0	0.0	0.0	--
Package Marking Ink (LP-1)	0	0	0	0	0	7.1E-03	0	0	3.5E-05	1.5E-05	Chromium III
Total Non-Fugitive Emissions	**80.91**	**81.09**	**81.09**	**0.02**	**3.12**	**0.17**	**2.62**	**3,763**	**0.06**	**0.06**	**Hexane**
Fugitive Emissions**											
Paved Roads*	0.43	0.09	0.02	0.0	0.0	0.0	0.0	0	0.0	0.0	--
Total Fugitive Emissions	**0.43**	**0.09**	**0.02**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**--**

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

Appendix A.1: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Boilers

Company Name: PacMoore Process Technologies
Source Address: 100 PacMoore Pkwy, Mooresville, Indiana 46158
Permit No: F109-34458-00062
Reviewer: Hannah L. Desrosiers

Unit	Heat Input Capacity MMBtu/hr
Water Heater	0.66
Boiler	0.20
Total	**0.86**

HHV
mmBtu
mmscf
1020

Potential Throughput MMCF/yr
7.4

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

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

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

HAPs Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03	
Potential Emission in tons/yr	7.8E-06	4.4E-06	2.8E-04	6.6E-03	1.3E-05	**6.9E-03**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03	
Potential Emission in tons/yr	1.8E-06	4.1E-06	5.2E-06	1.4E-06	7.8E-06	**2.0E-05**
					Total HAPs	**7.0E-03**
					Worst HAP	**6.6E-03**

Methodology is the same as above.

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

Greenhouse Gas Calculations

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

Methodology
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

Appendix A.1: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Spray Dryer 1 - Fuel Combustion

Company Name: PacMoore Process Technologies
Source Address: 100 PacMoore Pkwy, Mooresville, Indiana 46158
Permit No: F109-34458-00062
Reviewer: Hannah L. Desrosiers

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

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

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

Methodology

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

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03	
Potential Emission in tons/yr	5.8E-05	3.3E-05	2.1E-03	0.05	9.3E-05	**5.2E-02**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03	
Potential Emission in tons/yr	1.4E-05	3.0E-05	3.8E-05	1.0E-05	5.8E-05	**1.5E-04**
					Total HAPs	**0.05**
					Worst HAP	**0.05**

Methodology is the same as above.

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

Greenhouse Gas Calculations

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	3,298	0.1	0.1
Summed Potential Emissions in tons/yr	3,298		
CO2e Total in tons/yr	3,317		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

Appendix A.1: Emission Calculations
Particulate Control Devices
Baghouses

Company Name: PacMoore Process Technologies
Source Address: 100 PacMoore Pkwy, Mooresville, Indiana 46158
Permit No: F109-34458-00062
Reviewer: Hannah L. Desrosiers

Emission Unit	Baghouses					$PM/PM_{10}/PM_{2.5}$ Captured:Controlled Emissions		$PM/PM_{10}/PM_{2.5}$ Captured:Uncontrolled Emissions		$PM/PM_{10}/PM_{2.5}$ Uncaptured Emissions		$PM/PM_{10}/PM_{2.5}$ Limited PTE PSD Minor / FESOP Limits		Equivalent Limited Efficiency Required to Meet Limits
	Baghouse ID	Outlet Grain Loating (gr/dscf)	Air Flow Rate (dscfm)	Capture Efficiency (%)	Control Efficiency (%)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)	(%)
Blend Room 1	BH1	0.02	2,000	95.00%	98.00%	0.343	1.50	17.14	75.09	0.90	3.95	1.245	5.45	92.7%
Blend Room 1 docking station	BH2	0.02	2,000	95.00%	98.00%	0.343	1.50	17.14	75.09	0.90	3.95	1.245	5.45	92.7%
Blend Room 2	BH3	0.02	2,000	95.00%	98.00%	0.343	1.50	17.14	75.09	0.90	3.95	1.245	5.45	92.7%
Blend Room 2 docking station	BH4	0.02	2,000	95.00%	98.00%	0.343	1.50	17.14	75.09	0.90	3.95	1.245	5.45	92.7%
Re-pack Room 3	BH5	0.02	2,000	95.00%	98.00%	0.343	1.50	17.14	75.09	0.90	3.95	1.245	5.45	92.7%
Re-pack Room 3 docking station	BH6	0.02	2,000	95.00%	98.00%	0.343	1.50	17.14	75.09	0.90	3.95	1.245	5.45	92.7%
Re-pack Room 2	BH7	0.02	2,000	95.00%	98.00%	0.343	1.50	17.14	75.09	0.90	3.95	1.245	5.45	92.7%
Re-pack Room 2 docking station	BH8	0.02	2,000	95.00%	98.00%	0.343	1.50	17.14	75.09	0.90	3.95	1.245	5.45	92.7%
Bulk Loadout	BH9	0.02	2,000	95.00%	98.00%	0.343	1.50	17.14	75.09	0.90	3.95	1.245	5.45	92.7%
Bulk Loadout docking station	BH10	0.02	2,000	95.00%	98.00%	0.343	1.50	17.14	75.09	0.90	3.95	1.245	5.45	92.7%
Rail/Truck Unloading	BV1	0.02	2,000	95.00%	98.00%	0.343	1.50	17.14	75.09	0.90	3.95	1.245	5.45	92.7%
Rail/Truck Unloading docking station	BH11	0.02	2,000	100.00%	98.00%	0.343	1.50	17.14	75.09	0	0	0.343	1.50	98.0%
Baler	BH12	0.02	2,000	95.00%	98.00%	0.343	1.50	17.14	75.09	0.90	3.95	1.245	5.45	92.7%
Grinding Mill 1 - Small Receiving Bin	BH15	0.02	244	100.00%	98.00%	0.042	0.18	2.09	9.16	0	0	0.042	0.18	98.0%
Grinding Mill 1 - Large Receiving Bin	BH16	0.02	5,500	100.00%	98.00%	0.943	4.13	47.14	206.49	0	0	0.943	4.13	98.0%
Spray Dryer 1 - Bag Dump & Mix Tanks	BH17	0.02	2,000	95.00%	98.00%	0.343	1.50	17.14	75.09	0.90	3.95	1.245	5.45	92.7%
Grinding Mill 1 - docking station	BH19	0.02	1,250	95.00%	98.00%	0.214	0.94	10.71	46.93	0.56	2.47	0.778	3.41	92.7%
					Totals:	**26.28**		**299.9**	**1,314**	**12.29**	**53.84**	**18.29**	**80.12**	

Note: The PTE calaculations for baghouses # BH13, BH14, and BH18 are included on the following page, titled: "Product Recovery Cyclones & Associated Baghouses ".

Potential to Emit Before Baghouse (tons/yr):	**1,368**	**SUM (Captured:Uncontrolled) + SUM (Uncaptured)**
Potential to Emit After Baghouse tons/yr):	**80.12**	**SUM (Captured:Controlled) + SUM (Uncaptured)**
Limited Potential to Emit (tons/yr) *:	**80.12**	**SUM (Captured:Controlled + Uncaptured)**

Methodology

Captured:Controlled Emissions (lbs/hr) = [Outlet Grain Loading (grains/dscf)] * [Air Flow Rate (dscfm)] * [60 min/hr] * [lb/7000 grains]
Captured:Controlled Emissions (tons/yr) = [Captured:Controlled Emissions (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]
Captured:Uncontrolled Emissions (lbs/hr) = [Captured:Controlled Emissions (lbs/hr)] / [(1 - Control Efficiency)]
Captured:Uncontrolled Emissions (tons/yr) = [Captured:Uncontrolled Emissions (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]
Uncaptured Emissions (lbs/hr) = [Captured:Uncontrolled Emissions (lbs/hr)/(Capture Efficiency)] * [(1 - Capture Efficiency)]
Uncaptured Emissions (tons/yr) = [Uncaptured Emissions (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]
Limited Emissions (lbs/hr) = [Captured:Controlled Emissions + Uncaptured Emissions]
Limited Emissions (tons/yr) = [Limited Emissions (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]
Potential to Emit Before Baghouse (tons/yr) = [SUM(Captured:Uncontrolled Emissions) + SUM(Uncaptured Emissions)]
Potential to Emit After Baghouse (tons/yr) = [SUM(Captured:Controlled Emissions) + SUM(Uncaptured Emissions)]
* Limited Potential to Emit (tons/yr) = [SUM(Limited Emissions (tons/yr)]

Appendix A.1: Emission Calculations
Particulate Control Devices
Product Recovery Cyclones & Associated Baghouses

Company Name: PacMoore Process Technologies
Source Address: 100 PacMoore Pkwy, Mooresville, Indiana 46158
Permit No: F109-34458-00062
Reviewer: Hannah L. Desrosiers

Cyclones

Emission Unit	Maximum Thoughput (dry materials) (lbs/hr)*	Cyclone Collector		PM/PM_{10}/$PM_{2.5}$ Before Cyclone Emissions		PM/PM_{10}/$PM_{2.5}$ After Cyclone Emissions	
		Cyclone Collector ID	Collection Efficiency (%)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Pilot Spray Dryer	60	C0	99.25%	60.00	262.80	0.45	1.97
Spray Dryer 1 - Spray Dryer & Docking Station	2,000	C1	98.00%	2,000	8,760	40.0	175.20
Spray Dryer 1 - Fluid Bed Dryer	1,960	C2	98.00%	1,960	8,585	39.2	171.70
			Totals:		**17,608**		**348.87**

Potential to Emit Before Cyclone (tons/yr):	**17,608**
Potential to Emit After Cyclone (tons/yr):	**348.87**

Associated Baghouses

Emission Unit	PM/PM_{10}/$PM_{2.5}$ After Cyclone Emissions (lbs/hr)	Baghouses			PM/PM_{10}/$PM_{2.5}$ Captured:Uncontrolled Emissions		PM/PM_{10}/$PM_{2.5}$ Captured:Controlled Emissions		PM/PM_{10}/$PM_{2.5}$ Limited PTE PSD Minor / FESOP Limits		Equivalent Limited Efficiency Required to Meet Limits
		Baghouse ID	Capture Efficiency (%)	Control Efficiency (%)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)	(%)
Pilot Spray Dryer	0.45	BH14	100.00%	98.00%	0.45	1.97	0.009	0.04	0.009	0.04	98.0%
Spray Dryer 1 - Spray Dryer & Docking Station	40.00	BH13	100.00%	99.80%	40.00	175.20	0.080	0.35	0.080	0.35	99.8%
Spray Dryer 1 - Fluid Bed Dryer	39.20	BH18	100.00%	99.80%	39.20	171.70	0.078	0.34	0.078	0.34	99.8%
				Totals:		**348.87**		**0.73**		**0.73**	

Potential to Emit Before Baghouse (tons/yr):	**348.87**	**SUM (Captured:Uncontrolled)**
Potential to Emit After Baghouse tons/yr):	**0.73**	**SUM (Captured:Controlled)**
Limited Potential to Emit (tons/yr) *:**	**0.73**	**SUM (Captured:Controlled)**

Methodology
*The Maximum Throughput (lbs/hr), pre-cyclone, accounts for the dry materials only.
The pre-cyclone "Maximum Throughput (lbs/hr)" of the Fluid Bed Dryer accounts for the dry materials [only] collected (not emitted) by the Cyclone (C1) serving the Spray Dryer & docking station.
** The Maximum Throughput (lbs/hr), pre-baghouse, is equal to the PM/PM10/PM2.5 "After Cyclone" Emissions, from the above table.
The Spray Dryer, Fluid Bed Dryer, cyclone collector, and the baghouse are connected in series via a sealed, completely contained, conveying environment. Therefore, the capture efficiency is assumed 100% and no "uncaptured emissions" are anticipated.
Captured:Uncontrolled Emissions (lbs/hr) = [Maximum Throughput (lbs/hr) * Capture Efficiency (%)]
Captured:Uncontrolled Emissions (tons/yr) = [Captured:Uncontrolled Emissions (lbs/hr) * 8760 hrs/yr * 1 ton/2000 lbs]
Captured:Controlled Emissions (lbs/hr) = [Captured:Uncontrolled Emissions (lbs/hr) * (1 - Control Efficiency)]
Captured:Controlled Emissions (tons/yr) = [Captured:Controlled Emissions (lbs/hr) * 8760 hrs/yr * 1 ton/2000 lbs]
Limited Emissions = [Captured:Controlled Emissions]
Equivalent Limited Efficiency Required to Meet Limits (%) = [(1 - (Limited PTE (lbs/hr) / Captured:Uncontrolled Emissions (lbs/hr))) * 100]
Potential to Emit Before Baghouse (tons/yr) = [SUM(Captured:Uncontrolled Emissions) + SUM(Uncaptured Emissions)]
Potential to Emit After Baghouse (tons/yr) = [SUM(Captured:Controlled Emissions) + SUM(Uncaptured Emissions)]
*** Limited Potential to Emit (tons/yr) = [SUM(Limited Emissions (tons/yr)]

Appendix A.1: Emission Calculations
VOC & HAP Emissions
From Ink usage in the Package Marking (LP-1) Operation

Company Name: PacMoore Process Technologies
Source Address: 100 PacMoore Pkwy, Mooresville, Indiana 46158
Permit No: F109-34458-00062
Reviewer: Hannah L. Desrosiers

Volatile Organic Compound (VOC) Emissions

Material	Density (lb/gal)	Average Monthly Usage (mls/month)	Potential Annual Usage (gals/yr)	VOC Content (lbs/gal)	Potential VOC Emissions (lb/hr)	Potential VOC Emissions (lb/day)	Potential VOC Emissions (tons/yr)
VersaPrint-V300	8.34	1,167	4.70	2.09	1.12E-03	0.027	4.90E-03
ScanTrue	9.09	1,208	4.86	0.91	5.05E-04	0.012	2.21E-03
					1.62E-03	0.04	**0.01**

Hazardous Air Pollutant (HAP) Emissions

Material	Density (lb/gal)	Annual Usage (gal/yr)	Weight % Chromium III	Weight % Ethylbenzene	Weight % Quinol*	Weight % Toluene	Weight % Xylene	Potential HAP Emission Rates (tons/yr): Chromium III	Ethylbenzene	Quinol	Toluene	Xylene
VersaPrint-V300	8.34	4.70	0.66%	0%	0%	0%	0%	1.55E-05	0	0	0	0
ScanTrue	9.09	4.86	0%	0.20%	0.20%	0.20%	0.20%	0	4.86E-06	4.86E-06	4.86E-06	4.86E-06
						Total Individual HAPs (tons/yr):		**1.55E-05**	**4.86E-06**	**4.86E-06**	**4.86E-06**	**4.86E-06**
						Total Combined HAPs (tons/yr):		**3.49E-05**				

Notes:
Usage information provided by source as average rate per month (ml/month) over a 12 month period. This has been extrapolated out to 8,760 hours of operation and converted to gallons/yr using AP 42, Appendix A conversion Factors.
Source has reported the annual operating schedule as 24 hrs/day * 6 days/week = 144 hrs/week * 52 weeks/yr = 7,488 hrs/yr
VOC and HAP Contents obtained from product MSDS sheets.
Constant: The density of water is 8.343 lbs/gal @ 50 ^{o}F, and the specific gravity is 1.0.
The ScanTrue Ink contains up to 20% High Boiling Aliphatic Distillate Solvent (CAS 64742-80-9). To form a conservative estimate of emissions, it is assumed that this nonspecific aliphaltic solvent contains 1% Ethylbenzene, 1% Toluene, and 1% Xylenes. Reference: Table 1. Default Organic HAP Mass Fraction for Solvents and Solvent Blends (Source: 40 CFR 63).
*Quinol is also known as Quinoline, Benzopyridine, 1-Azanaphthalene, 1-Benzazine, 1-benzine, B-500, benzo[b]pyridine, chinoleine; chinoline; leucol; leucoline; or leukol.
Source has indicated that this is is an inkjet printing operation with no overspray; therefore the transfer efficiency is assumed to be 100% and particulate emissions are assumed negligible.

Methodology:
Density (lb/gal) = Specific Gravity of Material * Density of Water (lb/gal)
Potential Annual Usage (gals/yr) = [(Average Monthly Usage (mls/month)) * (1 month/4 weeks (avg)) * (1 week / 144 hrs) * (8760 hrs/yr) * 1 Liter / 1000 ml) * (0.2646 gal /1 Liter)]
VOC Content (lbs/gal) = [Density of the material (lb/gal) * Specific Gravity of Water]
Potential VOC Emissions (tons/yr) = Annual Usage (gal) * VOC Content (lbs/gal) * 1 ton / 2,000 lbs
Potential VOC Emissions (lb/hr) = Annual Usage (gal) * VOC Content (lbs/gal) * 1 yr / 8760 hrs
Potential VOC Emissions (lb/day) = Potential VOC (lb/hr) * 24
Potential HAP Emissions (tons/yr) = Annual Usage (gal) * HAP Content (lbs/gal) * 1 ton / 2,000 lbs

Appendix A.1: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: PacMoore Process Technologies
Source Address: 100 PacMoore Pkwy, Mooresville, Indiana 46158
Permit No: F109-34458-00062
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 Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Trucks Load/Unload									
Vehicle (entering plant) (one-way trip)	20.0	2.0	40.0	30.0	1200.0	1162	0.220	8.80	3,212.0
Vehicle (leaving plant) (one-way trip)	20.0	2.0	40.0	30.0	1200.0	1162	0.220	8.80	3,212.0
Entrance									
Vehicle (entering plant) (one-way trip)	140.0	3.0	420.0	4.15	1743.0	106	0.020	10.39	3,792.4
Vehicle (leaving plant) (one-way trip)	140.0	3.0	420.0	4.15	1743.0	106	0.020	10.39	3,792.4
Parking Lot									
Vehicle (entering plant) (one-way trip)	120.0	4.0	480.0	2.0	960.0	264	0.050	24.0	8,760.0
Vehicle (leaving plant) (one-way trip)	120.0	4.0	480.0	2.0	960.0	264	0.050	24.0	8,760.0
		Total	**1,880.0**		**7,806.0**			**86.4**	**31,528.7**

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

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

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

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.030	0.006	0.0014	lb/mile
Mitigated Emission Factor, Eext =	0.027	0.005	0.0013	lb/mile

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

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

Abbreviations
PM = Particulate Matter

Appendix A.1: Emissions Calculations
326 IAC 6-3-2(e) Allowable Rate of Emissions

Company Name: PacMoore Process Technologies
Source Address: 100 PacMoore Pkwy, Mooresville, Indiana 46158
Permit No: F109-34458-00062
Reviewer: Hannah L. Desrosiers

Emission Unit ID	Baghouse ID	Process Rate (materials throughput) (lbs/hr)	Process Weight Rate (tons/hr)	326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hr)	Control Efficiency Required to Meet Allowable PM Emission Rate (%)	Control Device Required to Meet Limit?
Blend Room 1	BH1	6,250	3.125	8.80	48.7%	Yes
Blend Room 1 docking station	BH2	6,250	3.125	8.80	48.7%	Yes
Blend Room 2	BH3	6,250	3.125	8.80	48.7%	Yes
Blend Room 2 docking station	BH4	6,250	3.125	8.80	48.7%	Yes
Re-pack Room 3	BH5	12,500	6.250	14.00	18.4%	Yes
Re-pack Room 3 docking station	BH6	12,500	6.250	14.00	18.4%	Yes
Re-pack Room 2	BH7	12,500	6.250	14.00	18.4%	Yes
Re-pack Room 2 docking station	BH8	12,500	6.250	14.00	18.4%	Yes
Bulk Loadout	BH9	10,000	5.000	12.05	29.7%	Yes
Bulk Loadout docking station	BH10	10,000	5.000	12.05	29.7%	Yes
Rail/Truck Unloading	BV1	10,000	5.000	12.05	29.7%	Yes
Rail/Truck Unloading docking station	BH11	10,000	5.000	12.05	29.7%	Yes
Baler	BH12	12,500	6.250	14.00	18.4%	Yes
Spray Dryer 1 - Spray Dryer & Docking Station	BH13	5,000	2.500	7.58	81.1%	Yes
Pilot Spray Dryer *	BH14	60	0.030	0.551	-22.4%	No
Grinding Mill 1 - Small Receiving Bin	BH15	1,500	0.750	3.38	-61.7%	No
Grinding Mill 1 - Large Receiving Bin	BH16	1,500	0.750	3.38	92.8%	Yes
Spray Dryer 1 - Bag Dump & Mix Tanks	BH17	5,000	2.500	7.58	55.8%	Yes
Spray Dryer 1 - Fluid Bed Dryer	BH18	4,900	2.450	7.47	80.9%	Yes
Grinding Mill 1 - docking station	BH19	1,500	0.750	3.38	68.4%	Yes

Methodology

Process weight; weight rate: Total weight of all materials introduced into any source operation (326 IAC 1-2-59(a)).

Allowable Emissions (E) (lb/hr) = 4.10(Process Weight Rate)^0.67

Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)*8760)/2000

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

Appendix A.2: Emissions Calculations
Emission Summary

Company Name: PacMoore Process Technologies
Address City IN Zip: 100 PacMoore Pkwy, Mooresville, Indiana 46158
Permit No.: F109-34458-00062
Reviewer: Hannah L. Desrosiers

Uncontrolled Potential to Emit (PTE) of Proposed Revision (tons/year)						
	Emissions Generating Activity					
Category	Pollutant	Spray Dryer 1 - Bag Dump & Mix Tanks (BH17)	Spray Dryer 1 - Fluid Bed Dryer * (BH18)	Grinding Mill 1 - Packaging Station Docking Station (BH19)	Package Marking Operation (LP-1)	**TOTAL**
Criteria Pollutants	PM	75.09	8,585	46.93	0	8,707
	PM10	75.09	8,585	46.93	0	8,707
	PM2.5	75.09	8,585	46.93	0	8,707
	SO2	0	0	0	0	0
	NOx	0	0	0	0	0
	VOC	0	0	0	7.11E-03	0.01
	CO	0	0	0	0	0
	GHGs as CO2e	0	0	0	0	0
Hazardous Air Pollutants	Benzene	0	0	0	0	0
	Dichlorobenzene	0	0	0	0	0
	Ethylbenzene	0	0	0	4.86E-06	4.86E-06
	Formaldehyde	0	0	0	0	0
	Hexane	0	0	0	0	0
	Quinol	0	0	0	4.86E-06	4.86E-06
	Toluene	0	0	0	4.86E-06	4.86E-06
	Xylenes	0	0	0	4.86E-06	4.86E-06
	Cadmium	0	0	0	0	0
	Chromium	0	0	0	1.55E-05	1.55E-05
	Lead	0	0	0	0	0
	Manganese	0	0	0	0	0
	Nickel	0	0	0	0	0
	Totals	**0**	**0**	**0**	**3.49E-05**	**3.4942E-05**
					Worse Case HAP	**1.5497E-05**

Total emissions based on rated capacity at 8,760 hours/year.
* PTE before consideration of integral product recovery cyclone.

Potential to Emit (PTE) of Proposed Revision After Product Recovery Cyclone (tons/year)						
	Emissions Generating Activity					
Category	Pollutant	Spray Dryer 1 - Bag Dump & Mix Tanks (BH17)	Spray Dryer 1 - Fluid Bed Dryer * (BH18)	Grinding Mill 1 - Packaging Station Docking Station (BH19)	Label Printing	**TOTAL**
Criteria Pollutants	PM	75.09	171.70	46.93	0	293.71
	PM10	75.09	171.70	46.93	0	293.71
	PM2.5	75.09	171.70	46.93	0	293.71
	SO2	0	0	0	0	0
	NOx	0	0	0	0	0
	VOC	0	0	0	7.11E-03	0.01
	CO	0	0	0	0	0
	GHGs as CO2e	0	0	0	0	0
Hazardous Air Pollutants	Benzene	0	0	0	0	0
	Dichlorobenzene	0	0	0	0	0
	Ethylbenzene	0	0	0	4.86E-06	4.86E-06
	Formaldehyde	0	0	0	0	0
	Hexane	0	0	0	0	0
	Quinol	0	0	0	4.86E-06	4.86E-06
	Toluene	0	0	0	4.86E-06	4.86E-06
	Xylenes	0	0	0	4.86E-06	4.86E-06
	Cadmium	0	0	0	0	0
	Chromium	0	0	0	1.55E-05	1.55E-05
	Lead	0	0	0	0	0
	Manganese	0	0	0	0	0
	Nickel	0	0	0	0	0
	Totals	**0**	**0**	**0**	**3.49E-05**	**3.4942E-05**
					Worse Case HAP	**1.5497E-05**

Total emissions based on rated capacity at 8,760 hours/year.
* PTE after consideration of integral product recovery cyclone.

Appendix A.2: Emission Calculations
Particulate Control Devices
Product Recovery Cyclones & Baghouses

Company Name: PacMoore Process Technologies
Source Address: 100 PacMoore Pkwy, Mooresville, Indiana 46158
Permit No: F109-34458-00062
Reviewer: Hannah L. Desrosiers

Cyclones

Emission Unit	Maximum Thoughput (dry materials) (lbs/hr)*	Cyclone Collector		$PM/PM_{10}/PM_{2.5}$ Before Cyclone Emissions		$PM/PM_{10}/PM_{2.5}$ After Cyclone Emissions	
		Cyclone Collector ID	Collection Efficiency (%)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Spray Dryer 1 - Fluid Bed Dryer	1,960	C2	98.00%	1,960	8,585	39.20	171.70
			Subotals:		**8,585**		**171.70**

Associated Baghouses

Emission Unit	$PM/PM_{10}/PM_{2.5}$ After Cyclone Emissions (lbs/hr)**	Baghouses			$PM/PM_{10}/PM_{2.5}$ Captured:Uncontrolled Emissions		$PM/PM_{10}/PM_{2.5}$ Captured:Controlled Emissions	
		Baghouse ID	Capture Efficiency (%)	Control Efficiency (%)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Spray Dryer 1 - Fluid Bed Dryer	39.20	BH18	100.00%	99.80%	39.20	171.70	0.08	0.34
				Subotals:		**171.70**		**0.34**

Methodology

*The Maximum Throughput (lbs/hr), pre-cyclone, accounts for the dry materials [only] collected (not emitted) by the Cyclone (C1) serving the Spray Dryer & docking station.
** The Maximum Throughput (lbs/hr), pre-baghouse, is equal to the PM/PM10/PM2.5 "After Cyclone" Emissions, from the above table.
The Fluid Bed Dryer, cyclone collector, and the baghouse are connected in series via a sealed, completely contained, conveying environment. Therefore, the "capture efficiency is assumed 100 % and no "uncaptured emissions" are anticipated.
Captured:Uncontrolled Emissions (lbs/hr) = [Maximum Throughput (lbs/hr) * Capture Efficiency (%)]
Captured:Uncontrolled Emissions (tons/yr) = [Captured:Uncontrolled Emissions (lbs/hr) * 8760 hrs/yr * 1 ton/2000 lbs]
Captured:Controlled Emissions (lbs/hr) = [Captured:Uncontrolled Emissions (lbs/hr) * (1 - Control Efficiency)]
Captured:Controlled Emissions (tons/yr) = [Captured:Controlled Emissions (lbs/hr) * 8760 hrs/yr * 1 ton/2000 lbs]

Baghouses

Emission Unit	Baghouses					$PM/PM_{10}/PM_{2.5}$ Captured:Controlled Emissions		$PM/PM_{10}/PM_{2.5}$ Captured:Uncontrolled Emissions		$PM/PM_{10}/PM_{2.5}$ Uncaptured Emissions	
	Baghouse ID	Outlet Grain Loating (gr/dscf)	Air Flow Rate (dscfm)	Capture Efficiency (%)	Control Efficiency (%)*	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Spray Dryer 1 - Bag Dump & Mix Tanks	BH17	0.02	2,000	95.00%	98.00%	0.343	1.50	17.14	75.09	0.90	3.95
Grinding Mill 1 - Docking Station	BH19	0.02	1,250	95.00%	98.00%	0.214	0.94	10.71	46.93	0.56	2.47
					Subotals:		**2.44**		**122.01**		**6.42**

Methodology

The PTE for these units is calculated based on the baghouse specifications.
Captured:Controlled Emissions (lbs/hr) = [Outlet Grain Loading (grains/dscf)] * [Air Flow Rate (dscfm)] * [60 min/hr] * [lb/7000 grains]
Captured:Controlled Emissions (tons/yr) = [Captured:Controlled Emissions (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]
Captured:Uncontrolled Emissions (lbs/hr) = [Captured:Controlled Emissions (lbs/hr)] / [(1 - Control Efficiency)]
Captured:Uncontrolled Emissions (tons/yr) = [Captured:Uncontrolled Emissions (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]
Uncaptured Emissions (lbs/hr) = [Captured:Uncontrolled Emissions (lbs/hr)/(Capture Efficiency)] * [(1 - Capture Efficiency)]
Uncaptured Emissions (tons/yr) = [Uncaptured Emissions (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]

Appendix A.2: Emission Calculations
VOC & HAP Emissions
From Ink usage in the Package Marking (LP-1) Operation

Company Name: PacMoore Process Technologies
Source Address: 100 PacMoore Pkwy, Mooresville, Indiana 46158
Permit No: F109-34458-00062
Reviewer: Hannah L. Desrosiers

Volatile Organic Compound (VOC) Emissions

Material	Density (lb/gal)	Average Monthly Usage (mls/month)	Potential Annual Usage (gals/yr)	VOC Content (lbs/gal)	Potential VOC Emissions (lb/hr)	Potential VOC Emissions (lb/day)	Potential VOC Emissions (tons/yr)
VersaPrint-V300	8.34	1,167	4.70	2.09	1.12E-03	0.027	4.90E-03
ScanTrue	9.09	1,208	4.86	0.91	5.05E-04	0.012	2.21E-03
					1.62E-03	0.04	**0.01**

Hazardous Air Pollutant (HAP) Emissions

Material	Density (lb/gal)	Annual Usage (gal/yr)	Weight % Chromium III	Weight % Ethylbenzene	Weight % Quinol*	Weight % Toluene	Weight % Xylene	Potential HAP Emission Rates (tons/yr) Chromium III	Ethylbenzene	Quinol	Toluene	Xylene
VersaPrint-V300	8.34	4.70	0.66%	0%	0%	0%	0%	1.55E-05	0	0	0	0
ScanTrue	9.09	4.86	0%	0.20%	0.20%	0.20%	0.20%	0	4.86E-06	4.86E-06	4.86E-06	4.86E-06
						Total Individual HAPs (tons/yr):		**1.55E-05**	**4.86E-06**	**4.86E-06**	**4.86E-06**	**4.86E-06**
						Total Combined HAPs (tons/yr):		**3.49E-05**				

Notes:
Usage information provided by source as average rate per month (ml/month) over a 12 month period. This has been extrapolated out to 8,760 hours of operation and converted to gallons/yr using AP 42, Appendix A conversion Factors.
Source has reported the annual operating schedule as 24 hrs/day * 6 days/week = 144 hrs/week * 52 weeks/yr = 7,488 hrs/yr
VOC and HAP Contents obtained from product MSDS sheets.
Constant: The density of water is 8.343 lbs/gal @ 50 ^{o}F, and the specific gravity is 1.0.
The ScanTrue Ink contains up to 20% High Boiling Aliphatic Distillate Solvent (CAS 64742-80-9). To form a conservative estimate of emissions, it is assumed that this nonspecific aliphaltic solvent contains 1% Ethylbenzene, 1% Toluene, and 1% Xylenes. Reference: Table 1. Default Organic HAP Mass Fraction for Solvents and Solvent Blends (Source: 40 CFR 63).
*Quinol is also known as Quinoline, Benzopyridine, 1-Azanaphthalene, 1-Benzazine, 1-benzine, B-500, benzo[b]pyridine, chinoleine; chinoline; leucol; leucoline; or leukol.
Source has indicated that this is is an inkjet printing operation with no overspray; therefore the transfer efficiency is assumed to be 100% and particulate emissions are assumed negligible.

Methodology:
Density (lb/gal) = Specific Gravity of Material * Density of Water (lb/gal)
Potential Annual Usage (gals/yr) = [(Average Monthly Usage (mls/month)) * (1 month/4 weeks (avg)) * (1 week / 144 hrs) * (8760 hrs/yr) * 1 Liter / 1000 ml) * (0.2646 gal /1 Liter)]
VOC Content (lbs/gal) = [Density of the material (lb/gal) * Specific Gravity of Water]
Potential VOC Emissions (tons/yr) = Annual Usage (gal) * VOC Content (lbs/gal) * 1 ton / 2,000 lbs
Potential VOC Emissions (lb/hr) = Annual Usage (gal) * VOC Content (lbs/gal) * 1 yr / 8760 hrs
Potential VOC Emissions (lb/day) = Potential VOC (lb/hr) * 24
Potential HAP Emissions (tons/yr) = Annual Usage (gal) * HAP Content (lbs/gal) * 1 ton / 2,000 lbs

Appendix A.2: Emissions Calculations
326 IAC 6-3-2(e) Allowable Rate of Emissions

Company Name: PacMoore Process Technologies
Source Address: 100 PacMoore Pkwy, Mooresville, Indiana 46158
Permit No: F109-34458-00062
Reviewer: Hannah L. Desrosiers

Emission Unit ID	Baghouse ID	Process Rate (materials throughput) (lbs/hr)	Process Weight Rate (tons/hr)	326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hr)	Control Efficiency Required to Meet Allowable PM Emission Rate (%)	Control Device Required to Meet Limit?
Spray Dryer 1 - Bag Dump & Mix Tanks	BH17	5,000	2.500	7.58	55.8%	Yes
Spray Dryer 1 - Fluid Bed Dryer	BH18	4,900	2.450	7.47	80.9%	Yes
Grinding Mill 1 - Docking Station	BH19	1,500	0.750	3.38	68.4%	Yes

Methodology

Process weight; weight rate: Total weight of all materials introduced into any source operation (326 IAC 1-2-

Allowable Emissions (E) (lb/hr) = 4.10(Process Weight Rate)^0.67

Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)*8760)/2000

Control Efficiency Required to Meet Allowable PM Emission Rate (%) = [(1 - (326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hr) / Captured:Uncontrolled Emissions from the "Product Recovery Cyclones & Baghouses" sheet, prev. (lbs/hr))) * 100]

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: Chris Hallman
PacMoore Process Technologies
100 PacMoore Parkway
Mooresville, Indiana 46158

DATE: October 7, 2014

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

SUBJECT: Final Decision
FESOP
109-34458-00062

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:
Adam Rawlins, Plant Manager / PacMoore Process Technologies
David Dempsey / Trinity Consultants
OAQ Permits Branch Interested Parties List

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

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

October 7, 2014

TO: Mooresville Public Library

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

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

Applicant Name: PacMoore Process Technologies
Permit Number: 109-34458-00062

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 10/7/2014 PacMoore Process Technologies 109-34458-00062 Final		
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2		Adam Rawlins Plant Mgr PacMoore Process Technologies 100 PacMoore Pkwy Mooresville IN 46158 *(RO CAATS)*									
3		Morgan County Commissioners 180 South Main Street Martinsville IN 46151 *(Local Official)*									
4		Mooresville Town Council 4 E Harrison Street Mooresville IN 46158 *(Local Official)*									
5		Mooresville Public Library 220 W Harrison St Mooresville IN 46158-1633 *(Library)*									
6		Clayton D. & Patricia A. Arthur 5178 Brenda Boulvard Greenwood IN 46143 *(Affected Party)*									
7		Morgan County Health Department 180 S Main Street, Suite 252 Martinsville IN 46151-1988 *(Health Department)*									
8		David Jones 7977 N. Taylors Rd. Mooresville IN 46158 *(Affected Party)*									
9		Claudia Parker 6761 Centenary Rd. Mooresville IN 46158 *(Affected Party)*									
10		James Swails 6568 E. Rosebud Lane Mooresville IN 46158 *(Affected Party)*									
11		John Thurston 6548 E. Watson Mooresville IN 46158 *(Affected Party)*									
12		Mr. David Dempsey Trinity Consultants 7330 Woodland Drive, Suite 225 Indianapolis IN 46278 *(Consultant)*									
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