



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: June 17, 2014

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

Source Name: Ingredion Incorporated Indianapolis Plant

Permit Level: Title V - Minor Source Modification

Permit Number: 097 - 34531 - 00042

Source Location: 1515 South Drover Street, Indianapolis, Indiana

Type of Action Taken: Modification at an existing source
Revisions to permit requirements

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 34531.

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 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 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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June 17, 2014

Ms. Melissa Putman
Ingredion Incorporated Indianapolis Plant
1515 South Drover Street
Indianapolis, IN 46221

Re: 097-34531-00042
Minor Source Modification

Dear Ms. Putman:

Ingredion Incorporated Indianapolis Plant was issued Part 70 Operating Permit Renewal No. T097-26765-00042 on April 16, 2010 for a stationary wet corn milling plant located at 1515 South Drover Street, Indianapolis. An application to modify the source was received on May 13, 2014. Pursuant to the provisions of 326 IAC 2-7-10.5, a Minor Source Modification is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-7-10.5, the following emission unit is approved for construction at the source:

- One (1) FBR Cooling System, identified as TR31913, approved in 2014 for installation, with a product throughput of 15,000 pounds per hour, using a cyclone (CY31917)* and baghouse (DC31917)* for product recovery and particulate control, and exhausting to stack 9-158.

*The control device is considered both integral to the process and inherent to the process for CAM applicability. Inherent process equipment is not subject to Compliance Assurance Monitoring (CAM).

The following construction conditions are applicable to the proposed modification:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

Commenced Construction

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(j), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.



A State that Works

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

Approval to Construct

6. Pursuant to 326 IAC 2-7-10.5(f)(3), this Minor Source Modification authorizes the construction of the new emission unit(s) when the Minor Source Modification has been issued.

Pursuant to 326 IAC 2-7-10.5(m), the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

Pursuant to 326 IAC 2-7-12, operation of the new emission unit(s) is not approved until the Significant Permit Modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification in accordance with 326 IAC 2-7-10.5(m)(2) and 326 IAC 2-7-12 (Permit Modification).

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 Laura Spriggs Thompson of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Laura Spriggs Thompson or extension 3-5693 or dial (317) 233-5693.

Sincerely,



Jason R. Krawczyk, Section Chief
Permits Branch
Office of Air Quality

Attachments: Minor Source Modification and Technical Support Document

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



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**Minor Source Modification
to a Part 70 Source**

OFFICE OF AIR QUALITY

**Ingredion Incorporated Indianapolis Plant
1515 South Drover Street
Indianapolis, Indiana 46221**

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

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

This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Minor Source Modification No.: 097-34531-00042	
Issued by:  Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 17, 2014

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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 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary wet corn milling plant which produces feed, gluten meal, germ meal, and heavy steepwater.

Source Address:	1515 South Drover Street, Indianapolis, Indiana 46221
General Source Phone Number:	(317) 635-4455
SIC Code:	2046
County Location:	Marion (Center Township)
Source Location Status:	Nonattainment for SO2 standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD 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 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) One (1) natural gas-fired #1 Starch Flash Dryer, identified as unit 40-4, with a maximum heat input capacity of 30 MMBtu/hr and with a maximum air throughput of 42,200 dscfm, using a wet scrubber for particulate control, constructed in 1965 and modified in 1994, and exhausting to stack 40-4; [326 IAC 6.5-6-25]
- (b) One (1) natural gas-fired #2 Starch Flash Dryer, identified as unit 40-3, with a maximum heat input capacity of 36 MMBtu/hr and with a maximum air throughput of 73,000 dscfm, using a wet scrubber for particulate control, constructed in 1967 and modified in 1994 and 1999, and exhausting to stack 40-3; [326 IAC 6.5-6-25]
- (c) One (1) natural gas-fired #3 Starch Flash Dryer, identified as unit 40-2, with a maximum heat input capacity of 36 MMBtu/hr and with a maximum air throughput of 60,000 dscfm, using a wet scrubber for particulate control, constructed in 1971, and exhausting to stack 40-2; [326 IAC 6.5-6-25]
- (d) One (1) natural gas-fired #4 Starch Flash Dryer, identified as unit 575-1, with a maximum heat input capacity of 43 MMBtu/hr and with a maximum air throughput of 84,100 dscfm, using a wet scrubber for particulate control, constructed in 1977, and exhausting to stack 575-1; [326 IAC 6.5-6-25]
- (e) One (1) natural gas-fired #6 Starch Flash Dryer, identified as unit 575-3, with a maximum heat input capacity of 40 MMBtu/hr and with a maximum throughput of 84,100 dscfm, using a wet scrubber for particulate control, constructed in 1993, and exhausting to stack 575-3; [326 IAC 6.5-1-2]

- (f) One (1) natural gas-fired #1 Spray Dryer, identified as unit 5549-1, with a maximum heat input capacity of 25 MMBtu/hr and with a maximum air throughput of 26,000 dscfm, using a wet scrubber for particulate control, constructed in 1993 and modified in 1998, and exhausting to stack 5549-1; [326 IAC 6.5-1-2]
- (g) One (1) natural gas-fired #2 Spray Dryer, identified as unit 5549-2, with a maximum heat input capacity of 25 MMBtu/hr and with a maximum air throughput of 26,000 dscfm, using a wet scrubber for particulate control, constructed in 1993 and modified in 1998, and exhausting to stack 5549-2; [326 IAC 6.5-1-2]
- (h) One (1) natural gas-fired #5 Starch Flash Dryer, identified as unit 575-2, with a maximum heat input capacity of 38 MMBtu/hr and with a maximum air throughput of 84,200 dscfm, using a wet scrubber for particulate control, constructed in 1979 and replaced in 1995, and exhausting to stack 575-2; [326 IAC 6.5-6-25]
- (i) One (1) natural gas-fired Feed Dryer, identified as unit 5502-1A, with a maximum heat input capacity of 77 MMBtu/hr and with a maximum throughput of 20 tons/hr, using a first effect wash water system for SO₂ control, and the RTO, unit 5502-1D for VOC and particulate control, constructed in 1997, and exhausting to the inlet of unit 5502-1D; [326 IAC 6.5-1-2]
- (j) One (1) natural gas-fired Germ Dryer, identified as unit 5502-1B, with a maximum heat input capacity of 20 MMBtu/hr and with a maximum throughput of 11 tons/hr, using the RTO, unit 5502-1D, for VOC and particulate control, constructed in 1997, and exhausting to the inlet of unit 5502-1D; [326 IAC 6.5-1-2]
- (k) One (1) natural gas-fired Gluten Dryer, identified as unit 5502-1C, with a maximum heat input capacity of 32 MMBtu/hr and with a maximum throughput of 4.21 tons/hr, using the RTO, unit 5502-1D, for VOC and particulate control, constructed in 1997, and exhausting to the inlet of unit 5502-1D; [326 IAC 6.5-1-2]
- (l) One (1) natural gas-fired Regenerative Thermal Oxidizer, identified as unit 5502-1D, with a maximum heat input capacity of 18 MMBtu/hr and, used as a control for particulate and VOC, constructed in 1997, and exhausting to stack 5502-7; [326 IAC 6.5-1-2]
- (m) Spray Agglomerator #3, identified as unit 5549-28, part of the spray agglomeration process, with a maximum heat input capacity of 25.0 MMBtu/hr and with a maximum air throughput of 32,300 dscfm, using a wet scrubber for particulate control, constructed in 2001, and exhausting to stack 5549-28; [326 IAC 6.5-1-2]
- (n) One (1) DSW Bulk Bag Filler, identified as unit 71-9, with a maximum capacity of 11 tons/hr, using a baghouse* for particulate control, constructed in 1995, and exhausting to stack 71-9; [326 IAC 6.5-1-2]
- (o) One (1) Feed Storage Hopper, identified as unit 5552-1, with a maximum air throughput of 2,450 dscfm, using a baghouse* for particulate control, constructed in 1995, and exhausting to stack 5552-1; [326 IAC 6.5-1-2]
- (p) One (1) Product Transfer Hopper, identified as unit 5552-2, with a maximum air throughput of 350 dscfm, using a baghouse* for control, constructed in 1995, and exhausting to stack 5552-2; [326 IAC 6.5-1-2]
- (q) One (1) Truck Loadout, identified as unit 5503-6, with a maximum throughput of 25 tons/hr, using a baghouse for particulate control, constructed in 1999, and exhausting to stack 5502-3; [326 IAC 6.5-1-2]

- (r) One (1) Germ Bin, one (1) Pellet Bin #1, and one (1) Pellet Bin #2, identified as units 5503-2, 5503-3, and 5503-4 respectively, and with a combined maximum throughput of 120 tons/hr, using a Loadout Dust Collection System for particulate control, identified as 5503-5, each constructed in 1997, and exhausting to stack 5503-2; [326 IAC 6.5-1-2]
- (s) One (1) DSW Packing Fugitive Dust Collector, identified as unit 71-7, with a maximum throughput of 0.1 tons/hr, using a baghouse for particulate control, constructed in 1977, and exhausting to stack 71-7; [326 IAC 6.5-1-2]
- (t) One (1) RSP North Packing Line, identified as unit 577-2, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1979 and modified in 2000, and exhausting to stack 577-2; [326 IAC 6.5-1-2]
- (u) One (1) Gluten Receiver, identified as unit 5503-1, with a maximum throughput of 4.21 tons/hr, using a baghouse* for particulate control, constructed in 1997, and exhausting to stack 5503-1; [326 IAC 6.5-1-2]
- (v) One (1) Pellet Cooler and one (1) Germ Cooler, identified as units 5502-5 and 5502-6, with a maximum throughput of 19.36 tons/hr and 4.21 tons/hr respectively, each using a high efficiency cyclone for particulate control, each constructed in 1997, and exhausting to stacks 5502-5 and 5502-6; [326 IAC 6.5-1-2]
- (w) Two (2) Loose Feed Bins, collectively identified as unit 5502-4, each with a maximum throughput of 19.36 tons/hr, using a baghouse for particulate control, constructed in 1997, and exhausting to stack 5502-3; [326 IAC 6.5-1-2]
- (x) One (1) Hammer Mill, identified as unit 5502-3, with a maximum throughput of 19.36 tons/hr, using a baghouse for particulate control, constructed in 1997, and exhausting to stack 5502-3; [326 IAC 6.5-1-2]
- (y) One (1) DSE Bag Slitter, identified as unit 42-10, with a maximum throughput of 10 tons/hr, using a baghouse for particulate control, constructed in 1987, and exhausting to stack 42-10; [326 IAC 6.5-6-25]
- (z) One (1) P-6 Rework Station, identified as unit 54-1, with a maximum throughput of 7.5 tons/hr, using a baghouse for particulate control, constructed in 1987, and exhausting to stack 54-1; [326 IAC 6.5-1-2]
- (aa) One (1) RSP Hopper #4, identified as unit 577-5, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-5; [326 IAC 6.5-1-2]
- (bb) One (1) RSP Hopper #6, identified as unit 577-6, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-6; [326 IAC 6.5-1-2]
- (cc) One (1) RSP Hopper #5, identified as unit 577-7, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-7; [326 IAC 6.5-1-2]
- (dd) One (1) RSP Hopper #1, identified as unit 577-8, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-8; [326 IAC 6.5-1-2]

- (ee) One (1) RSP Hopper #2, identified as unit 577-9, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-9; [326 IAC 6.5-1-2]
- (ff) One (1) RSP Hopper #3, identified as unit 577-10, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-10; [326 IAC 6.5-1-2]
- (gg) One (1) Industrial Packer, identified as unit 71-1, with a maximum air throughput of 5,300 dscfm, using a baghouse for particulate control, constructed in 1994, and exhausting to stack 71-1; [326 IAC 6.5-6-25]
- (hh) Two (2) Spray Dryer Product Receivers, identified as units 5549-3 and 5549-4, each with a maximum air throughput of 1,700 dscfm, each using a baghouse* for particulate control, each constructed in 1993, and exhausting to stacks 5549-3 and 5549-4; [326 IAC 6.5-1-2]
- (ii) One (1) #1 Spray Dryer Storage Hopper #1, identified as unit 5549-7, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 5549-7; [326 IAC 6.5-1-2]
- (jj) One (1) #1 Spray Dryer Storage Hopper #2, identified as unit 5549-8, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 5549-8; [326 IAC 6.5-1-2]
- (kk) One (1) #2 Spray Dryer Storage Hopper #3, identified as unit 5549-9, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 5549-9; [326 IAC 6.5-1-2]
- (ll) One (1) #2 Spray Dryer Storage Hopper #4, identified as unit 5549-10, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 5549-10; [326 IAC 6.5-1-2]
- (mm) One (1) Agglomerator Feed Storage Bin, identified as unit 5549-12, with a maximum air throughput of 1530 dscfm, using a baghouse* for particulate control, constructed in 1995, and exhausting to stack 5549-12; [326 IAC 6.5-1-2]
- (nn) One (1) Agglomerator, identified as unit 5549-13, with a maximum air throughput of 12,500 dscfm, using a baghouse for particulate control, constructed in 1995, and exhausting to stack 5549-13; [326 IAC 6.5-1-2]
- (oo) One (1) Agglomerator Equipment Aspiration, identified as unit 5549-14, with a maximum air throughput of 2,840 dscfm, using a baghouse** for particulate control, constructed in 1995, and exhausting to stack 5549-14; [326 IAC 6.5-1-2]
- (pp) One (1) spray agglomeration process, constructed in 2000, consisting of the following units:
 - (1) Bulk Bag Packer Filter Receiver, identified as unit 5549-17, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, and exhausting to stack 5549-17; [326 IAC 6.5-1-2]
 - (2) Line 1 Middle Packer, identified as unit 5549-18, with a maximum air throughput of 4,600 dscfm, using a baghouse* for particulate control, and exhausting to stack 5549-18; [326 IAC 6.5-1-2]

- (3) Line 1 North Packer, identified as unit 5549-19, with a maximum air throughput of 5,400 dscfm, using a baghouse* for particulate control, and exhausting to stack 5549-19; [326 IAC 6.5-1-2]
 - (4) #2 Fugitive Dust Collector, identified as emission unit 5549-20, with a maximum throughput of 14,000 dscfm, using a baghouse for particulate control, and exhausting to stack 5549-20; [326 IAC 6.5-1-2]
 - (5) Line 1 Packing ambient D/C, identified as unit 5549-21, with a maximum air throughput of 14,000 dscfm, using a baghouse for particulate control, and exhausting to stack 5549-21; [326 IAC 6.5-1-2]
 - (6) Line 2 Packer, identified as unit 5549-26, with a maximum air throughput of 5,400 dscfm, using a baghouse* for particulate control, and exhausting to stack 5549-26; [326 IAC 6.5-1-2]
- (qq) One (1) West Corn Truck Dump, identified as unit 56-1, with a maximum throughput of 448 tons/hr, using a baghouse for particulate control, constructed prior to 1968, and modified in 1996, and exhausting to stack 56-1; [326 IAC 6.5-6-25]
- (rr) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations: [326 IAC 2-7-1(21)(G)(xxiii)]
- (1) One (1) DSE Hopper #9, identified as unit 42-3A, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 6; [326 IAC 6.5-6-25]
 - (2) One (1) DSE Hopper #10, identified as unit 42-3B, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 7; [326 IAC 6.5-6-25]
 - (3) One (1) DSE Hopper #11, identified as unit 42-3C, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 43-3C; [326 IAC 6.5-6-25]
 - (4) One (1) DSE Hopper #12, identified as unit 42-3D, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 9; [326 IAC 6.5-6-25]
 - (5) One (1) DSE Hopper #13, identified as unit 42-3E, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 10; [326 IAC 6.5-6-25]
 - (6) One (1) DSE Hopper #14, identified as unit 42-3F, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 11; [326 IAC 6.5-6-25]
 - (7) One (1) DSE Hopper #2, identified as unit 42-7A, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 14; [326 IAC 6.5-6-25]
 - (8) One (1) DSE Hopper #4, identified as unit 42-7B, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 14; [326 IAC 6.5-6-25]

- (9) One (1) DSE Hopper #6, identified as unit 42-7C, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 16; [326 IAC 6.5-6-25]
- (10) One (1) DSE Hopper #1, identified as unit 42-8A, with a maximum throughput of 10 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 17A; [326 IAC 6.5-6-25]
- (11) One (1) DSE Hopper #3, identified as unit 42-8B, with a maximum throughput of 10 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 17B; [326 IAC 6.5-6-25]
- (12) One (1) DSE Hopper #5, identified as unit 42-8C, with a maximum throughput of 10 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 17C; [326 IAC 6.5-6-25]
- (13) One (1) DSE Hopper #7, identified as unit 42-8D, with a maximum throughput of 10 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 17D; [326 IAC 6.5-6-25]
- (14) One (1) CWS #8; identified as unit 63-1A, with a maximum throughput of 1 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and modified in 1976, and exhausting to stack 46A; [326 IAC 6.5-1-2]
- (15) One (1) CWS South East, identified as unit 63-1B, with maximum throughput of 1 ton/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 46B; [326 IAC 6.5-1-2]
- (16) One (1) CWS South Mill; identified as unit 63-17, constructed in 1977, with a maximum throughput of 0.8 tons/hr, using a baghouse** (replaced baghouse in 2008) for particulate control, and exhausting to stack 53; [326 IAC 6.5-1-2]
- (ss) One (1) Grain Elevator, identified as unit 56-2, with a maximum throughput of 80 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 24; [326 IAC 6.5-6-25]
- (tt) Starch operations, starch drying, starch handling and starch packaging consisting of the following units:
 - (1) One (1) Filter Receiver, identified as 152-1, with a maximum air throughput of 500 dscfm, using a baghouse* for particulate control, constructed in 2002, and exhausting to stack 152-1; [326 IAC 6.5-1-2]
 - (2) One (1) Mixer baghouse, identified as 152-2, with a maximum air throughput of 1,000 dscfm, using a baghouse* for particulate control, constructed in 2002 and approved in 2011 for modification, and exhausting to stack 152-2; [326 IAC 6.5-1-2]
 - (3) One (1) Starch Cooler Filter Receiver, identified as 152-3 (Bld 852), with a maximum air throughput of 589 dscfm, using a baghouse* for particulate control, constructed in 2002, and exhausting to stack 152-3; [326 IAC 6.5-1-2]
 - (4) One (1) Starch Mixer 2 Filter/Receiver, identified as 152-4 (Bld 852A), with a maximum air throughput of 600 dscfm, using a baghouse* for particulate control, constructed on in 2002, and exhausting to stack 152-4; [326 IAC 6.5-1-2]

- (5) One (1) Starch Mixer 2, identified as 152-5 (Bld 852A), with a maximum air throughput of 1,000 dscfm, using a baghouse* for particulate control, constructed in 2002, and exhausting to stack 152-5; [326 IAC 6.5-1-2]
- (6) One (1) Starch Storage Hopper, identified as 152-6, with a maximum throughput of 15 tons/hr, using a baghouse** for particulate control, constructed in 2003, and exhausting to stack 152-6; [326 IAC 6.5-1-2]
- (7) One (1) Starch Filter/Receiver 2 Bld 852, identified as unit 152-7, with a maximum air throughput of 500 dscfm, using a baghouse** for particulate control, constructed in 2004, and exhausting to stack 152-7; [326 IAC 6.5-1-2]
- (8) One (1) Starch Mixer 4 Bld 852A Filter Receiver, identified as unit 152-8, with a maximum air throughput of 600 dscfm, using a baghouse** for particulate control, constructed in 2004, and exhausting to stack 157-8; [326 IAC 6.5-1-2]
- (9) One (1) Starch Mixer 4 Bld 852A, identified as unit 152-9, with a maximum air throughput of 20 dscfm, using a baghouse** for particulate control, constructed in 2004, and exhausting to stack 152-9; [326 IAC 6.5-1-2]
- (10) One (1) Starch Mixer 3 Bld 852A Filter Receiver, identified as unit 152-10, with a maximum air 600 dscfm, using a baghouse** for particulate control, constructed in 2004, and exhausting to stack 152-10; [326 IAC 6.5-1-2]
- (11) One (1) Starch Mixer 3 Bld 852A, identified as unit 152-11, with a maximum air throughput of 1,000 dscfm, using a baghouse* for particulate control, constructed in 2004 and approved in 2011 for modification, and exhausting to stack 152-11; [326 IAC 6.5-1-2]
- (12) One (1) Bulk Bag Receiver, identified as 152-12, with a maximum air throughput of 800 dscfm, using a baghouse* for particulate control, constructed in 2004, and exhausting to stack 157-12; [326 IAC 6.5-1-2]
- (13) One (1) Starch Storage Silo #2 Receiver; identified as Bin TF41820 (formerly unit 61-21), with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed in 1976, modified in 1981, approved in 2010 for additional modification, and exhausting to stack TF41820; [326 IAC 6.5-1-2]
- (14) One (1) Starch Cooling and Conveying System, identified as TF41818 (formerly unit 581-2), with a maximum air throughput of 14,000 dscfm, using a baghouse* for particulate control, constructed in 1983, approved in 2010 for modification, and exhausting to stack TF41818; [326 IAC 6.5-1-2]
- (15) One (1) Blending Bin, identified as 152-15 (formerly unit TF41819), with a maximum air throughput of 4,000 dscfm, using a baghouse* for particulate control, approved in 2010 for construction, and exhausting to stack DC41819 [326 IAC 6.5-1-2]
- (16) One (1) Starch Hopper D/C, identified as 128-3, with a maximum throughput of 12.5 tons/hr, using a baghouse* for particulate control, constructed in 1983 and modified in 2000, and exhausting to stack 128-3; [326 IAC 6.5-1-2]
- (17) One (1) DSW Chemical Blender Bag Slitter, identified as unit 61-15, with a maximum throughput of 7.5 tons/hr, using a baghouse** for particulate control, constructed prior to 1974, and exhausting to stack 35; [326 IAC 6.5-1-2]

- (18) One (1) sodium sulfate conveying system, including a receiver and silo, identified as unit 40-1A and 40-1B, with a maximum throughput of 15 tons/hr, using two baghouses* for particulate control, constructed prior to 1968, modified in 1998, and exhausting to stacks 1A and 1B; [326 IAC 6.5-1-2]
- (19) One (1) DSE North Packer, identified as unit 42-1, with a maximum throughput of 30 tons/hr, using a baghouse* for particulate control, constructed prior to 1968 and modified in 1996, and exhausting to stack 5; [326 IAC 6.5-6-25]
- (20) One (1) DSE Hopper #8, identified as unit 42-4, with a maximum throughput of 13.95 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 17E; [326 IAC 6.5-6-25]
- (21) One (1) DSE Negative Receiver, identified as unit 42-6, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 13; [326 IAC 6.5-6-25]
- (22) One (1) DSE South Packer, identified as unit 42-9, with a maximum throughput of 30 tons/hr, using a baghouse* for particulate control, constructed prior to 1968 and modified in 1996, and exhausting to stack 18; [326 IAC 6.5-1-2]
- (23) One (1) DSE Railcar Loading - East Track, identified as unit 42-11, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 20; [326 IAC 6.5-1-2]
- (24) One (1) DSE Railcar Loading - West Track, identified as unit 42-12, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 21; [326 IAC 6.5-1-2]
- (25) One (1) DSE Bulk Bag System, identified as unit 42-13, with a maximum throughput of 30 tons/hr, using a receiver/baghouse* for particulate control, constructed in 1997, and exhausting to stack 106; [326 IAC 6.5-1-2]
- (26) One (1) Dextrin #1 System Pneumatic, identified as unit 61-3, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1973, and exhausting to stack 27; [326 IAC 6.5-1-2]
- (27) One (1) Dextrin Flash Dryer, identified as unit 61-9, with a maximum throughput of 5 tons/hr, using a cyclone and a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 30; [326 IAC 6.5-6-25]
- (28) One (1) Dextrin #3 System Pneumatic, identified as unit 61-22, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 41; [326 IAC 6.5-1-2]
- (29) One (1) Dextrin #2 System Pneumatic, identified as unit 61-23, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 42; [326 IAC 6.5-1-2]
- (30) One (1) Dextrin #1 System Mixer, identified as unit 61-1, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1973, and exhausting to stack 25; [326 IAC 6.5-1-2]
- (31) One (1) Dextrin #1 System Cookers, identified as unit 61-2, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1973, and exhausting to stack 26; [326 IAC 6.5-1-2]

- (32) One (1) Dextrin #2 System Mixer, identified as unit 61-6, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1974, and exhausting to stack 28; [326 IAC 6.5-6-25]
- (33) Two (2) Dextrin #2 System East and West Batch Bins, identified as units 61-7E and 61-7W, each with a maximum throughput of 5 tons/hr, using two baghouses* for particulate control, constructed in 1974, and exhausting to stacks 29A and 29B; [326 IAC 6.5-1-2]
- (34) One (1) Starch Storage Silo #3 Receiver, identified as unit 61-11, with a maximum throughput of 7.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 31; [326 IAC 6.5-1-2]
- (35) One (1) Starch Storage Silo #1 Receiver, identified as unit 61-12, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 32; [326 IAC 6.5-1-2]
- (36) One (1) Starch Storage Silo #1, identified as unit 61-13, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 33; [326 IAC 6.5-1-2]
- (37) One (1) Dextrin Blend, identified as unit 61-14, with a maximum throughput of 7.5 tons/hr, using hopper/filter receiver using a baghouse** for particulate control, constructed prior to 1973, and exhausting to stack 61-14; [326 IAC 6.5-6-25]
- (38) One (1) DSW Chemical Blender Tank; identified as unit 61-14A, with a maximum throughput of 7.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 34; [326 IAC 6.5-6-25]
- (39) One (1) Dextrin System Acidifiers; identified as unit 61-16, with a maximum air throughput of 1,530 dscfm, using a baghouse* for particulate control, constructed in 1973, and exhausting to stack 36; [326 IAC 6.5-1-2]
- (40) One (1) Dextrin #2 System Cooler; identified as unit 61-18, with a maximum air throughput of 2,300 dscfm, using a baghouse* for particulate control, constructed in 1974, and exhausting to stack 37; [326 IAC 6.5-1-2]
- (41) One (1) Dextrin #3 System Cookers; identified as unit 61-19, with a maximum air throughput of 2,300 dscfm, using a baghouse* for particulate control, constructed in 1974, and exhausting to stack 38; [326 IAC 6.5-1-2]
- (42) One (1) Starch Storage Silo #2; identified as unit 61-20, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 39; [326 IAC 6.5-1-2]
- (43) One (1) Dextrin #3 System Mixer; identified as unit 61-24, with a maximum air throughput of 410 dscfm, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 43; [326 IAC 6.5-1-2]
- (44) One (1) Dextrin #3 System West Batch Bin; identified as unit 61-25, with a maximum air throughput of 350 dscfm, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 44; [326 IAC 6.5-1-2]
- (45) One (1) Dextrin #3 System East Batch Bin; identified as unit 61-26, with a maximum air throughput of 350 dscfm, using a baghouse** for particulate control, constructed in 1976, and exhausting to stack 45; [326 IAC 6.5-1-2]

- (46) One (1) CWS #7 Dryer Receiver; identified as unit 63-3, with a maximum air throughput of 2000 dscfm, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 47; [326 IAC 6.5-1-2]
- (47) One (1) CWS North Mill, identified as unit 63-4, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 48; [326 IAC 6.5-1-2]
- (48) One (1) CWS North Product, identified as unit 63-5, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 49; [326 IAC 6.5-1-2]
- (49) One (1) CWS Packer; identified as unit 63-9, with a maximum throughput of 20 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 50; [326 IAC 6.5-1-2]
- (50) One (1) Liquid Glue Bag Dump; identified as unit 63-12, with a maximum throughput of 8 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 51; [326 IAC 6.5-1-2]
- (51) One (1) CWS #9 and #10 Dryers Receiver; identified as unit 63-15, with a maximum air throughput of 3,600 dscfm, using a baghouse* for particulate control, constructed in 1975 and modified in 2010, and exhausting to stack 52; [326 IAC 6.5-1-2]
- (52) CWS #11, #12, and #13 Dryers; identified as unit 63-16A and 63-16B, each with a maximum air throughput of 3,300 dscfm, using two baghouses* for particulate control, constructed prior to August 7, 1977, and exhausting to stacks 54A and 54B; [326 IAC 6.5-1-2]
- (53) One (1) CWS South Raw Material Dump; identified as unit 63-18, with a maximum throughput of 3.5 tons/hr, using a baghouse** for particulate control, constructed in 1977, and exhausting to stack 55; [326 IAC 6.5-1-2]
- (54) One (1) DSW Negative Receiver; identified as unit 63-20, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 56; [326 IAC 6.5-1-2]
- (55) Two (2) DSW Hoppers #17 and #18; identified as unit 71-2A and 71-2B, each with a maximum throughput of 15 tons/hr, using two baghouses* for particulate control, constructed prior to 1968, and exhausting to stacks 58A and 58B; [326 IAC 6.5-6-25]
- (56) One (1) Negative Receiver; identified as unit 71-3, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 71-3; [326 IAC 6.5-1-2]
- (57) One (1) DSW Hopper #13, identified as unit 71-4, with a maximum throughput of 2.5 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 67; [326 IAC 6.5-6-25]
- (58) One (1) DSW Hopper #1; identified as unit 71-5A, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 59; [326 IAC 6.5-6-25]

- (59) One (1) DSW Hopper #2; identified as unit 71-5B, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 60; [326 IAC 6.5-6-25]
- (60) One (1) DSW Hopper #3; identified as unit 71-5C, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 61; [326 IAC 6.5-6-25]
- (61) One (1) DSW Hopper #4; identified as unit 71-5D, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 62; [326 IAC 6.5-6-25]
- (62) One (1) DSW Hopper #5; identified as unit 71-5E, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 63; [326 IAC 6.5-6-25]
- (63) One (1) DSW Hopper #6; identified as unit 71-5F, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 64; [326 IAC 6.5-6-25]
- (64) One (1) DSW Hopper #7; identified as unit 71-5G, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 65; [326 IAC 6.5-6-25]
- (65) One (1) DSW Hopper #8; identified as unit 71-5H, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 66; [326 IAC 6.5-6-25]
- (66) One (1) DSW Hopper #9; identified as unit 71-5I, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 71-5I; [326 IAC 6.5-6-25]
- (67) One (1) DSW Hopper #10; identified as unit 71-5J, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 8; [326 IAC 6.5-6-25]
- (68) One (1) DSW Hopper #11; identified as unit 71-5K, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 69; [326 IAC 6.5-6-25]
- (69) One (1) DSW Hopper #12; identified as unit 71-5L, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 70; [326 IAC 6.5-6-25]
- (70) One (1) DSW Bulk Car Loading; identified as unit 71-8, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed in 1971, and exhausting to stack 72; [326 IAC 6.5-1-2]
- (71) One (1) RSP South Bulk Bag Packing; identified as unit 577-1, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 77; [326 IAC 6.5-1-2]
- (72) One (1) FG Bulk Bag Bin Vent Bld 800, identified as unit FA-60582, with a maximum throughput of 18 tons/hr using a baghouse** for particulate control, constructed in 2003, and exhausting to stack FA-60582; [326 IAC 6.5-1-2]

- (73) One (1) RSP South Packing Line, identified as unit 577-3, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 79; [326 IAC 6.5-1-2]
- (74) One (1) RSP Bulk Loading System A; identified as unit 577-4, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 80; [326 IAC 6.5-1-2]
- (75) One (1) RSP Bulk Loading Fugitive Dust Collector**; identified as unit 577-4A, with a maximum throughput of 18 tons/hr and an actual throughput of 18 lbs/hr, constructed in 1986, and exhausting to stack 81; [326 IAC 6.5-1-2]
- (76) One (1) CSW conveying cyclone operation, identified as unit 578-1, with a maximum throughput of 7.5 tons/hr, using a baghouse** for particulate control, returned to service in 2008, and exhausting through stack 578-1. [326 IAC 6.5-1-2]
- (77) One (1) CWS Packing Hopper; identified as unit 578-2, with a maximum throughput of 1 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 89; [326 IAC 6.5-1-2]
- (78) One (1) CWS Milling System, identified as unit 578-3, with a maximum throughput of 1.5 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 90; [326 IAC 6.5-1-2]
- (79) One (1) Base Blending Bin 158-5, identified as unit TF31901, with a maximum air throughput of 2,000 dscfm, using product recovery DC-31901** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 1-158; [326 IAC 6.5-1-2]
- (80) One (1) Base Bin 158-1, identified as unit TF31902, with a maximum air throughput of 200 dscfm, using product recovery DC-31901** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 2-158; [326 IAC 6.5-1-2]
- (81) One (1) Product Bin 158-2, identified as unit TF31991, with a maximum air throughput of 200 dscfm, using product recovery DC-31991** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 3-158; [326 IAC 6.5-1-2]
- (82) One (1) Surge Tank Bin 158-3, identified as unit SH31913, with a maximum air throughput of 200 dscfm, using product recovery DC-31911** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 7-158; [326 IAC 6.5-1-2]
- (83) One (1) Bulk Bag Unload Bin 158-4, identified as unit DC-31900 (Bld 630) with a maximum air throughput of 600 dscfm, using a dust collector* for particulate control, constructed in 2004, and exhausting to stack 8-158; [326 IAC 6.5-1-2]
- (84) One (1) FBR exhaust, identified as unit TR31912, with a maximum air throughput of 8,800 dscfm, using product recovery metal filters** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 5-158 [326 IAC 6.5-1-2]
- (85) One (1) FBR Cooling System, identified as TR31913, approved in 2014 for installation, with a product throughput of 15,000 pounds per hour, using a cyclone (CY31917)* and baghouse (DC31917)* for product recovery and particulate control, and exhausting to stack 9-158.
- (86) One (1) starch dryer, identified as unit T-1, with a maximum production rate of 300 lbs/hr, using a product collector/cyclone and dust collector* for particulate control, constructed in 2005, and exhausting to stack T-1; [326 IAC 6.5-1-2]

- (87) One (1) Line 1 South Packing Hopper, identified as unit 5549-22, with a maximum air throughput of 4,800 dscfm, using a baghouse* for particulate control, constructed in 2006, and exhausting to stack 5549-22. [326 IAC 6.5-1-2]

*The control device is considered both integral to the process and inherent to the process for CAM applicability. Inherent process equipment is not subject to Compliance Assurance Monitoring (CAM).

**The control device is considered inherent to the process for CAM applicability. Inherent process equipment is not subject to Compliance Assurance Monitoring (CAM).

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

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

- (a) Stationary fire pump engines, including:
- (1) One (1) 210-horsepower diesel-fired emergency fire pump engine, identified as FP1, constructed in 2003;
- Under 40 CFR 63, Subpart ZZZZ, this is an affected facility.
- (2) One (1) 300-horsepower diesel-fired emergency fire pump engine, identified as FP2, constructed in 2003; and
- Under 40 CFR 63, Subpart ZZZZ, this is an affected facility.
- (3) One (1) 300-horsepower diesel-fired emergency fire pump engine, identified as FP3, constructed in 2006.
- Under 40 CFR 63, Subpart ZZZZ, this is an affected facility.
Under 40 CFR 60, Subpart IIII, this is an affected facility.
- (b) Combustion related activities including spaces heaters, process heaters, or boilers using natural gas-fired with heat input equal to or less than ten million (10,000,000) British thermal units per hour;
- (1) One (1) process heater, Bld 630, natural gas fired, with maximum heat input capacity of 5.1 MMBtu/hr, identified as emission unit YX31914A, constructed in 2004 and venting out stack 158-6. [326 IAC 6-2-4]
- (c) Cleaners and solvents, from operations M1 through M4 and RSP shop, characterized as:
- (1) having a vapor pressure equal to or less than two (2.0) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pound per square inch) measured at thirty-eight (38) degrees Centigrade (one hundred (100) degrees Fahrenheit); or
- (2) having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit);
- the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months. [326 IAC 8-3-2] [326 IAC 8-3-8]

- (d) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

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

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

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

- (a) This permit, T097-26765-00042, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
 - (i) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (ii) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (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.

The Permittee shall implement the PMPs.

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

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

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

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

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

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

- (a) All terms and conditions of permits established prior to T097-26765-00042 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b) or (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

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

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date.

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

Compliance Requirements [326 IAC 2-1.1-11]

C.8 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 2-7-5(1)][326 IAC 2-7-6(1)]

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

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

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

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

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

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

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

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

Upon detecting an excursion where a response step 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.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]
Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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 Part 70 permit.

Records of required monitoring information include the following, where applicable

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

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

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.
- (c) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;

- (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
- (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

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

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part shall be submitted to:

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

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

Stratospheric Ozone Protection

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

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) natural gas-fired #1 Starch Flash Dryer, identified as unit 40-4, with a maximum heat input capacity of 30 MMBtu/hr and with a maximum air throughput of 42,200 dscfm, using a wet scrubber for particulate control, constructed in 1965 and modified in 1994, and exhausting to stack 40-4; [326 IAC 6.5-6-25]
- (b) One (1) natural gas-fired #2 Starch Flash Dryer, identified as unit 40-3, with a maximum heat input capacity of 36 MMBtu/hr and with a maximum air throughput of 73,000 dscfm, using a wet scrubber for particulate control, constructed in 1967 and modified in 1994 and 1999, and exhausting to stack 40-3; [326 IAC 6.5-6-25]
- (c) One (1) natural gas-fired #3 Starch Flash Dryer, identified as unit 40-2, with a maximum heat input capacity of 36 MMBtu/hr and with a maximum air throughput of 60,000 dscfm, using a wet scrubber for particulate control, constructed in 1971, and exhausting to stack 40-2; [326 IAC 6.5-6-25]
- (d) One (1) natural gas-fired #4 Starch Flash Dryer, identified as unit 575-1, with a maximum heat input capacity of 43 MMBtu/hr and with a maximum air throughput of 84,100 dscfm, using a wet scrubber for particulate control, constructed in 1977, and exhausting to stack 575-1; [326 IAC 6.5-6-25]
- (e) One (1) natural gas-fired #6 Starch Flash Dryer, identified as unit 575-3, with a maximum heat input capacity of 40 MMBtu/hr and with a maximum throughput of 84,100 dscfm, using a wet scrubber for particulate control, constructed in 1993, and exhausting to stack 575-3; [326 IAC 6.5-1-2]
- (f) One (1) natural gas-fired #1 Spray Dryer, identified as unit 5549-1, with a maximum heat input capacity of 25 MMBtu/hr and with a maximum air throughput of 26,000 dscfm, using a wet scrubber for particulate control, constructed in 1993 and modified in 1998, and exhausting to stack 5549-1; [326 IAC 6.5-1-2]
- (g) One (1) natural gas-fired #2 Spray Dryer, identified as unit 5549-2, with a maximum heat input capacity of 25 MMBtu/hr and with a maximum air throughput of 26,000 dscfm, using a wet scrubber for particulate control, constructed in 1993 and modified in 1998, and exhausting to stack 5549-2; [326 IAC 6.5-1-2]
- (h) One (1) natural gas-fired #5 Starch Flash Dryer, identified as unit 575-2, with a maximum heat input capacity of 38 MMBtu/hr and with a maximum air throughput of 84,200 dscfm, using a wet scrubber for particulate control, constructed in 1979 and replaced in 1995, and exhausting to stack 575-2; [326 IAC 6.5-6-25]
- (i) One (1) natural gas-fired Feed Dryer, identified as unit 5502-1A, with a maximum heat input capacity of 77 MMBtu/hr and with a maximum throughput of 20 tons/hr, using a first effect wash water system for SO₂ control, and the RTO, unit 5502-1D for VOC and particulate control, constructed in 1997, and exhausting to the inlet of unit 5502-1D; [326 IAC 6.5-1-2]
- (j) One (1) natural gas-fired Germ Dryer, identified as unit 5502-1B, with a maximum heat input capacity of 20 MMBtu/hr and with a maximum throughput of 11 tons/hr, using the RTO, unit 5502-1D, for VOC and particulate control, constructed in 1997, and exhausting to the inlet of unit 5502-1D; [326 IAC 6.5-1-2]

- (k) One (1) natural gas-fired Gluten Dryer, identified as unit 5502-1C, with a maximum heat input capacity of 32 MMBtu/hr and with a maximum throughput of 4.21 tons/hr, using the RTO ,unit 5502-1D, for VOC and particulate control, constructed in 1997, and exhausting to the inlet of unit 5502-1D; [326 IAC 6.5-1-2]
- (l) One (1) natural gas-fired Regenerative Thermal Oxidizer, identified as unit 5502-1D, with a maximum heat input capacity of 18 MMBtu/hr and, used as a control for particulate and VOC, constructed in 1997, and exhausting to stack 5502-7; [326 IAC 6.5-1-2]
- (m) Spray Agglomerator #3, identified as unit 5549-28, part of the spray agglomeration process, with a maximum heat input capacity of 25.0 MMBtu/hr and with a maximum air throughput of 32,300 dscfm, using a wet scrubber for particulate control, constructed in 2001, and exhausting to stack 5549-28; [326 IAC 6.5-1-2]

(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 2-7-5(1)]

D.1.1 Prevention of Significant Deterioration [326 IAC 2-2]

- (a) Pursuant to CP 097-00042-97-01, issued March 24, 1997, A 097-00042-98-01, issued April 15, 1998, and in order to render the requirements of 326 IAC 2-2 not applicable:
 - (1) The combined input of corn grind to units 5502-1A, 5502-1B, 5502-1C, 5502-3 (Section D.2), 5502-4 (Section D.2), 5502-5 (Section D.2), 5502-6 (Section D.2), 5503-1 (Section D.2), 5503-2 (Section D.2), 5503-3 (Section D.2), 5503-4 (Section D.2), 5503-5 (Section D.2) and 5503-6 (Section D.2) shall not exceed 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit and the limits set in D.1.1(c) and D.2.1(a) limits PM/PM10 emissions to less than or equal to 43.862 tons per year and will render the requirements of 326 IAC 2-2 not applicable.
 - (2) The combined input of starch for units 5549-1 and 5549-2 shall not exceed 22,500 tons per twelve consecutive month period with compliance determined at the end of each month and the total emission rate shall not exceed 2.50 lb PM/PM10 per ton of starch. Compliance with this limit will limit PM/PM10 emissions to less than or equal to 28.11 tons per year and will render the requirements of 326 IAC 2-2 not applicable.
 - (3) The SO₂ emissions from units 5502-1A, 5502-1B, 5502-1C, and 5502-1D, shall not exceed a total of 8.05 pounds per hour. Compliance with this limit will limit SO₂ emissions to less than or equal to 35.26 tons per year and will render the requirements of 326 IAC 2-2 not applicable.
 - (4) The combined input of natural gas to 5502-1A, 5502-1B, 5502-1C, and 5502-1D shall not exceed 1,780 million cubic feet (MMcf) per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit will limit NO_x emissions to less than or equal to 39 tons per year and will render the requirements of 326 IAC 2-2 not applicable.
- (b) Pursuant to CP 097-00042-97-01, issued March 24, 1997, SSM 097-11362-00042, issued August 31, 1996, and in order to render the requirements of 326 IAC 2-2 not applicable, the following facilities are limited as indicated in the table below:

Unit/ Stack ID	PM/PM10 Limit (gr/dscf)	PM/PM10 Limit (lb/hr)	PM/PM10 Limit (ton/yr)
575-3	0.012	5.63	24.65
5549-1	0.02	--	--
5549-2	0.02	--	--
5549-28	0.025	9.64	42.24

- (c) Pursuant to M 097-00042-99-01, issued February 25, 1999, the total PM/PM10 emissions from stack 5502-7 (exhausting emissions from units 5502-1A through 5502-1D) shall not exceed 0.0114 gr/dscf, 4.53 lb/hr, and 19.856 tons per year. Compliance with this limit will render the requirements of 326 IAC 2-2 not applicable.
- (d) Pursuant to CP 097-00042-99-01, issued June 11, 1999, the starch produced from unit 40-3 shall not exceed 145,610 tons per twelve consecutive month period with compliance determined at the end of each month and the emission rate shall not exceed 0.581 lb of PM/PM10 per ton of starch produced. Compliance with this limit will limit PM/PM10 emissions to less than or equal to 42.3 tons per year, will satisfy the requirements of 326 IAC 6.5-6-25, and render the requirements of 326 IAC 2-2 not applicable.
- (e) The combined VOC emissions from units 5502-1A, 5502-1B, 5502-1C, and 5502-1D shall not exceed a total of 4.89 pounds per hour. Compliance with this limit will limit VOC emissions to less than or equal to 21.4 tons of per year and will render the requirements of 326 IAC 2-2 not applicable to the Germ Dryer, Feed Dryer, and Gluten Dryer.

D.1.2 Particulate Matter [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, the particulate matter emissions from units 575-3, 5502-1A, 5502-1B, 5502-1C, 5502-1D, 5549-1, 5549-2, and 5549-28 shall each not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

D.1.3 Particulate Matter [326 IAC 6.5-6-25]

- (a) Facilities 40-4, 40-3, 40-2, 575-1, and 575-2 are limited as indicated in the table below:

Facility	PM Limit (gr/dscf)	PM Limit (ton/yr)
40-4	0.02	44.1
40-3	0.016	42.3
40-2	0.016	31.9
575-1	0.011	32.4
575-2	0.011	32.4

Compliance with these limits will satisfy the requirements of 326 IAC 6.5-6-25.

- (b) Pursuant to CP 097-00042-95-02, issued March 8, 1995, the amount of dry product processed by unit 575-2 shall not exceed 123,300 tons per twelve month consecutive period with compliance determined at the end of each month. Compliance with this limit will satisfy the requirements of 326 IAC 6.5-6-25.

D.1.4 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the Permittee shall employ Best Available Control Technology (BACT) for emission units 5502-1A, 5502-1B, 5502-1C which has been determined to be:

- (a) The VOC emissions from the Germ Dryer, Feed Dryer, and Gluten Dryer, identified as 5502-1A, 5502-1B, and 5502-1C, shall be controlled by a regenerative thermal oxidizer or an equivalent thermal oxidation unit.
- (b) The overall VOC efficiency for the regenerative thermal oxidizer, or an equivalent thermal oxidation unit, (including capture efficiency and destruction efficiency) shall be at least 95%.
- (c) The VOC emissions from the Germ Dryer, Feed Dryer, and Gluten Dryer, identified as 5502-1A, 5502-1B, and 5502-1C, combined shall not exceed 4.89 pounds per hour (lbs/hr).

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for units 40-2, 40-3, 40-4, 575-1, 575-2, 575-3, 5502-1A, 5502-1B, 5502-1C, 5549-1, 5549-2, 5549-28, 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.1.6 Particulate, Sulfur Dioxide and VOC Control

- (a) In order to comply with Conditions D.1.1, D.1.2 and D.1.4, the RTO, or an equivalent thermal oxidation unit, shall be in operation and control particulate and VOC emissions from units 5502-1A, 5502-1B, and 5502-1C at all times when any of those units are in operation.
- (b) In order to comply with Condition D.1.1(a)(3), the first (1st) effect wash water system shall be in operation and control SO₂ emissions from unit 5502-1A at all times the unit is in operation.
- (c) In order to comply with Conditions D.1.1, D.1.2, and D.1.3, the scrubbers shall be in operation and control particulate emissions from units 40-2, 40-3, 40-4, 575-1, 575-2, 575-3, 5549-1, 5549-2, and 5549-28 at all times those units are in operation.

D.1.7 Testing Requirements [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Condition D.1.1 and D.1.4, the Permittee shall perform SO₂ and VOC testing on emission units 5502-1A, 5502-1B, 5502-1C and 5502-1D, utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

- (b) If emission unit 5502-1D is replaced with an equivalent thermal oxidation unit, not later than 180 days after installation of an equivalent thermal oxidation unit, in order to demonstrate compliance with Condition D.1.1(e) and D.1.4(b), the Permittee shall perform VOC testing on emission units 5502-1A, 5502-1B, 5502-1C, utilizing methods approved by the Commissioner. Testing shall be repeated every five (5) years from the initial test or most recent valid compliance demonstration of an equivalent thermal oxidation unit. 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.

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

D.1.8 Visible Emission Notations

- (a) Visible emission notations of exhaust from stacks 40-2, 40-3, 40-4, 575-1, 575-2, 575-3, 5502-7, 5549-1, 5549-2, and 5549-28 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. A notation of abnormal visible emissions is not a deviation from this permit.
- (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 shall be considered a deviation from this permit.

D.1.9 Parametric Monitoring for Scrubbers, RTO and First (1st) Effect Wash Water System

- (a) The Permittee shall monitor the pH and flow rate of the liquid through the nozzles of the first (1st) effect wash water to the GHE at least once per week of the system used to control SO₂ emissions from unit 5502-1A. When for any one reading the pH of the liquid used in the first (1st) effect wash water is less than 6.5 or the flow rate of the first (1st) effect wash water is below the minimum 400 gallons per minute or a minimum established during the latest stack test, 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. A pH or flow rate reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

- (b) The Permittee shall monitor the exhaust air stream pressure drop across each scrubber, and each scrubber make-up rate at least once per week from the scrubbers controlling emissions from units 40-3, 575-1, 575-2, and 575-3 when units 40-3, 575-1, 575-2, and 575-3 are in operation. When, for any one reading, the pressure drop across the scrubbers are outside the normal range of 6.0 to 15.0 inches of water, or the make-up rate is below the minimum 10 gallons per minute, or a range established during the latest stack test, 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. A pressure drop or make-up rate 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.
- (c) The Permittee shall monitor the exhaust air stream pressure drop across each scrubber, and each scrubber make-up rate at least once per week from the scrubbers controlling emissions from units 5549-1 and 5549-2 when units 5549-1 and 5549-2 are in operation. When, for any one reading, the pressure drop across the scrubbers are outside the normal range of 6.0 to 15.0 inches of water, or the make-up rate is below the minimum 20 gallons per minute, or a range established during the latest stack test, 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. A pressure drop or make-up rate 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.
- (d) The Permittee shall monitor the exhaust air stream pressure drop across each scrubber, and each scrubber make-up rate at least once per week from the scrubbers controlling emissions from units 40-2 and 40-4 when units 40-2 and 40-4 are in operation. When, for any one reading, the pressure drop across the scrubbers are outside the normal range of 3.0 to 8.0 inches of water, or the make-up rate is below the minimum 10 gallons per minute, or a range established during the latest stack test, 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. A pressure drop or make-up rate 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.
- (e) The Permittee shall monitor the exhaust air stream pressure drop across the scrubber, and the scrubber make-up rate at least once daily from the scrubber controlling emissions from unit 5549-28 when unit 5549-28 is in operation. When, for any one reading, the pressure drop across the scrubber is outside the normal range of 6.0 to 15.0 inches of water, or the make-up rate is below the minimum 20 gallons per minute, or a range established during the latest stack test, 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. A pressure drop or make-up rate 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.
- (f) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer, or an equivalent thermal oxidation unit, for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until any approved stack test results are available, the Permittee shall take appropriate response steps whenever the three (3) hour average temperature of the thermal oxidizer, or an equivalent thermal oxidation unit, is below 1450°F. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this

condition. A three (3) hour average temperature that is below 1450°F is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit. Approved stack test results may reset the three (3) hour average temperature of the thermal oxidizer, or an equivalent thermal oxidation unit, to an alternative temperature and be incorporated via minor modification procedures.

- (g) The instruments used for determining the pH, pressure drop, flow rate and temperature shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated, maintained, and operated according to the Preventive Maintenance Plan.

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

D.1.10 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1(a)(1), the Permittee shall maintain monthly records of the combined input of corn grind for the units identified in Condition D.1.1(a)(1).
- (b) To document the compliance status with Conditions D.1.1(a)(2), the Permittee shall maintain monthly records of the combined input of starch for units 5549-1 and 5549-2.
- (c) To document the compliance status with Condition D.1.1(a)(4), the Permittee shall maintain monthly records of the total input of natural gas consumed by 5502-1A, 5502-1B, 5502-1C, and 5502-1D.
- (d) To document the compliance status with Condition D.1.1(d), the Permittee shall maintain monthly records of the amount of starch produced by unit 40-3.
- (e) To document the compliance status with Condition D.1.3(b), the Permittee shall maintain monthly records of the amount of dry product processed by unit 575-2.
- (f) To document the compliance status with Condition D.1.8, the Permittee shall maintain a daily record of visible emission notations of the exhaust from stacks 40-2, 40-3, 40-4, 575-1, 575-2, 575-3, 5502-7, 5549-1, 5549-2, and 5549-28. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (g) To document the compliance status with Conditions D.1.1(a)(3) and D.1.9(a), the Permittee shall maintain weekly records of the pH and flow rate of the first (1st) effect wash water during normal operations.
- (h) To document the compliance status with Condition D.1.9(b), D.1.9(c), and D.1.9(d), the Permittee shall maintain weekly records of the pressure drop across the scrubbers and scrubbers make-up rates during normal operation. The Permittee shall include in its weekly 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 week).
- (i) To document the compliance status with Condition D.1.9(e), the Permittee shall maintain a daily records of the pressure drop across the scrubber and scrubber make-up rates 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).

- (j) To document the compliance status with Condition D.1.9(f), the Permittee shall maintain continuous records (on a 3-hour average basis) for the RTO (unit 5502-1D), or an equivalent thermal oxidation unit, combustion chamber temperature during normal operations.
- (k) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.11 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Conditions D.1.1, and D.1.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1 (35).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (n) One (1) DSW Bulk Bag Filler, identified as unit 71-9, with a maximum capacity of 11 tons/hr, using a baghouse* for particulate control, constructed in 1995, and exhausting to stack 71-9; [326 IAC 6.5-1-2]
- (o) One (1) Feed Storage Hopper, identified as unit 5552-1, with a maximum air throughput of 2,450 dscfm, using a baghouse* for particulate control, constructed in 1995, and exhausting to stack 5552-1; [326 IAC 6.5-1-2]
- (p) One (1) Product Transfer Hopper, identified as unit 5552-2, with a maximum air throughput of 350 dscfm, using a baghouse* for control, constructed in 1995, and exhausting to stack 5552-2; [326 IAC 6.5-1-2]
- (q) One (1) Truck Loadout, identified as unit 5503-6, with a maximum throughput of 25 tons/hr, using a baghouse for particulate control, constructed in 1999, and exhausting to stack 5502-3; [326 IAC 6.5-1-2]
- (r) One (1) Germ Bin, one (1) Pellet Bin #1, and one (1) Pellet Bin #2, identified as units 5503-2, 5503-3, and 5503-4 respectively, and with a combined maximum throughput of 120 tons/hr, using a Loadout Dust Collection System for particulate control, identified as 5503-5, each constructed in 1997, and exhausting to stack 5503-2; [326 IAC 6.5-1-2]
- (s) One (1) DSW Packing Fugitive Dust Collector, identified as unit 71-7, with a maximum throughput of 0.1 tons/hr, using a baghouse for particulate control, constructed in 1977, and exhausting to stack 71-7; [326 IAC 6.5-1-2]
- (t) One (1) RSP North Packing Line, identified as unit 577-2, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1979 and modified in 2000, and exhausting to stack 577-2; [326 IAC 6.5-1-2]
- (u) One (1) Gluten Receiver, identified as unit 5503-1, with a maximum throughput of 4.21 tons/hr, using a baghouse* for particulate control, constructed in 1997, and exhausting to stack 5503-1; [326 IAC 6.5-1-2]
- (v) One (1) Pellet Cooler and one (1) Germ Cooler, identified as units 5502-5 and 5502-6, with a maximum throughput of 19.36 tons/hr and 4.21 tons/hr respectively, each using a high efficiency cyclone for particulate control, each constructed in 1997, and exhausting to stacks 5502-5 and 5502-6; [326 IAC 6.5-1-2]
- (w) Two (2) Loose Feed Bins, collectively identified as unit 5502-4, each with a maximum throughput of 19.36 tons/hr, using a baghouse for particulate control, constructed in 1997, and exhausting to stack 5502-3; [326 IAC 6.5-1-2]
- (x) One (1) Hammer Mill, identified as unit 5502-3, with a maximum throughput of 19.36 tons/hr, using a baghouse for particulate control, constructed in 1997, and exhausting to stack 5502-3; [326 IAC 6.5-1-2]
- (y) One (1) DSE Bag Slitter, identified as unit 42-10, with a maximum throughput of 10 tons/hr, using a baghouse for particulate control, constructed in 1987, and exhausting to stack 42-10; [326 IAC 6.5-6-25]

- (z) One (1) P-6 Rework Station, identified as unit 54-1, with a maximum throughput of 7.5 tons/hr, using a baghouse for particulate control, constructed in 1987, and exhausting to stack 54-1; [326 IAC 6.5-1-2]
- (aa) One (1) RSP Hopper #4, identified as unit 577-5, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-5; [326 IAC 6.5-1-2]
- (bb) One (1) RSP Hopper #6, identified as unit 577-6, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-6; [326 IAC 6.5-1-2]
- (cc) One (1) RSP Hopper #5, identified as unit 577-7, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-7; [326 IAC 6.5-1-2]
- (dd) One (1) RSP Hopper #1, identified as unit 577-8, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-8; [326 IAC 6.5-1-2]
- (ee) One (1) RSP Hopper #2, identified as unit 577-9, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-9; [326 IAC 6.5-1-2]
- (ff) One (1) RSP Hopper #3, identified as unit 577-10, with a maximum air throughput of 4,500 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 577-10; [326 IAC 6.5-1-2]
- (gg) One (1) Industrial Packer, identified as unit 71-1, with a maximum air throughput of 5,300 dscfm, using a baghouse for particulate control, constructed in 1994, and exhausting to stack 71-1; [326 IAC 6.5-6-25]
- (hh) Two (2) Spray Dryer Product Receivers, identified as units 5549-3 and 5549-4, each with a maximum air throughput of 1,700 dscfm, each using a baghouse* for particulate control, each constructed in 1993, and exhausting to stacks 5549-3 and 5549-4; [326 IAC 6.5-1-2]
- (ii) One (1) #1 Spray Dryer Storage Hopper #1, identified as unit 5549-7, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 5549-7; [326 IAC 6.5-1-2]
- (jj) One (1) #1 Spray Dryer Storage Hopper #2, identified as unit 5549-8, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 5549-8; [326 IAC 6.5-1-2]
- (kk) One (1) #2 Spray Dryer Storage Hopper #3, identified as unit 5549-9, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 5549-9; [326 IAC 6.5-1-2]
- (ll) One (1) #2 Spray Dryer Storage Hopper #4, identified as unit 5549-10, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, constructed in 1993, and exhausting to stack 5549-10; [326 IAC 6.5-1-2]
- (mm) One (1) Agglomerator Feed Storage Bin, identified as unit 5549-12, with a maximum air throughput of 1530 dscfm, using a baghouse* for particulate control, constructed in 1995, and exhausting to stack 5549-12; [326 IAC 6.5-1-2]

- (nn) One (1) Agglomerator, identified as unit 5549-13, with a maximum air throughput of 12,500 dscfm, using a baghouse for particulate control, constructed in 1995, and exhausting to stack 5549-13; [326 IAC 6.5-1-2]
- (oo) One (1) Agglomerator Equipment Aspiration, identified as unit 5549-14, with a maximum air throughput of 2,840 dscfm, using a baghouse** for particulate control, constructed in 1995, and exhausting to stack 5549-14; [326 IAC 6.5-1-2]
- (pp) One (1) spray agglomeration process, constructed in 2000, consisting of the following units:
- (1) Bulk Bag Packer Filter Receiver, identified as unit 5549-17, with a maximum air throughput of 450 dscfm, using a baghouse* for particulate control, and exhausting to stack 5549-17; [326 IAC 6.5-1-2]
 - (2) Line 1 Middle Packer, identified as unit 5549-18, with a maximum air throughput of 4,600 dscfm, using a baghouse* for particulate control, and exhausting to stack 5549-18; [326 IAC 6.5-1-2]
 - (3) Line 1 North Packer, identified as unit 5549-19, with a maximum air throughput of 5,400 dscfm, using a baghouse* for particulate control, and exhausting to stack 5549-19; [326 IAC 6.5-1-2]
 - (4) #2 Fugitive Dust Collector, identified as emission unit 5549-20, with a maximum throughput of 14,000 dscfm, using a baghouse for particulate control, and exhausting to stack 5549-20; [326 IAC 6.5-1-2]
 - (5) Line 1 Packing ambient D/C, identified as unit 5549-21, with a maximum air throughput of 14,000 dscfm, using a baghouse for particulate control, and exhausting to stack 5549-21; [326 IAC 6.5-1-2]
 - (6) Line 2 Packer, identified as unit 5549-26, with a maximum air throughput of 5,400 dscfm, using a baghouse* for particulate control, and exhausting to stack 5549-26; [326 IAC 6.5-1-2]
- (qq) One (1) West Corn Truck Dump, identified as unit 56-1, with a maximum throughput of 448 tons/hr, using a baghouse for particulate control, constructed prior to 1968, and modified in 1996, and exhausting to stack 56-1; [326 IAC 6.5-6-25]

*The control device is considered both integral to the process and inherent to the process for CAM applicability. Inherent process equipment is not subject to Compliance Assurance Monitoring (CAM).

(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 2-7-5(1)]

D.2.1 Prevention of Significant Deterioration [326 IAC 2-2]

- (a) Pursuant to CP 097-0042-97-01, issued March 24, 1997, M 097-00042-99-01, issued February 25, 1999, MSM 097-11764-00042, issued March 10, 2000, SSM 097-11362-00042, issued August 31, 2000, SPM 097-24287-00042, issued on August 23, 2007, and SPM 097-23497-00042, the following facilities are limited as indicated in the table below:

Unit/ Stack ID	PM/PM ₁₀ Limit (gr/dscf)	PM/PM ₁₀ Limit (lb/hr)	PM/PM ₁₀ Limit (ton/yr)
577-2	0.01	1.29	5.65
577-5	0.009	0.35	1.52
577-6	0.009	0.35	1.52
577-7	0.009	0.35	1.52
577-8	0.009	0.35	1.52
577-9	0.009	0.35	1.52
577-10	0.009	0.35	1.52
5549-3	0.01	0.15	0.64
5549-4	0.01	0.15	0.64
5549-7	0.01	0.039	0.17
5549-8	0.01	0.039	0.17
5549-9	0.01	0.039	0.17
5549-10	0.01	0.039	0.17
5549-12	0.01	0.13	0.57
5549-13	0.01	0.98	4.29
5549-14	0.01	0.24	1.07
5502-3, 5502-4 & 5503-6 (stack 5502-3)	0.01	0.96	4.393
5502-5	0.01	1.13	5.177
5503-1	0.01	1.53	6.977
5503-2 through 5503-5	0.01	0.71	3.11
5502-6	0.01	0.99	4.349
5549-17	0.01	0.04	0.15
5549-18	0.01	0.28	1.21
5549-19	0.01	0.24	1.04
5549-20	0.01	0.93	4.05
5549-21	0.01	1.2	5.27
5549-26	0.01	0.26	1.16
71-9	0.01	0.13	0.57
5552-1	0.01	0.03	0.13
5552-2	0.01	0.21	0.9

- (b) The combined input of corn grind to units 5502-1A (Section D.1), 5502-1B (Section D.1), 5502-1C (Section D.1), 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2, 5503-3, 5503-4, 5503-5, and 5503-6 shall not exceed 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit and the limits set in D.1.1(a) and D.2.1(a) limits PM/PM10 emissions to less than or equal to 43.862 tons per year and will render the requirements of 326 IAC 2-2 not applicable.
- (c) The input of starch to unit 5549-13 shall not exceed 14,010 tons per twelve consecutive month period with compliance determined at the end of each month. The emission rate shall not exceed 0.61 lb PM/PM10 per ton of starch.

Compliance with these limits will render the requirements of 326 IAC 2-2 (Prevention Significant Deterioration) not applicable.

D.2.2 Particulate Matter [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, the particulate matter emissions from units 54-1, 71-7, 71-9, 577-2, 577-5 through 577-10, 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2 through 5503-5, 5503-6, 5549-3, 5549-4, 5549-7 through 5549-10, 5549-12, 5549-13, 5549-14, the spray agglomeration process (consisting of units 5549-17 through 5549-19, 5549-20, 5549-21, and 5549-26), 5552-1, and 5552-2 shall each not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

D.2.3 Particulate Matter [326 IAC 6.5-6-25]

- (a) Pursuant to 326 IAC 6.5-6-25, the particulate matter emissions from facility 42-10 shall not exceed 0.03 gr/dscf and 2.4 tons per year.
- (b) Pursuant to 326 IAC 6.5-6-25, the particulate matter emissions from facility 56-1 shall not exceed 0.02 gr/dscf and 7.02 tons per year.
- (c) Pursuant to 326 IAC 6.5-6-25, the particulate matter emissions from facility 71-1 shall not exceed 0.03 gr/dscf and 0.9 tons per year.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for facilities 42-10, 54-1, 56-1, 71-1, 71-7, 71-9, 577-2, 577-5 through 577-10, 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2 through 5503-5, 5503-6, 5549-3, 5549-4, 5549-7 through 5549-10, 5549-12, 5549-13, 5549-14, 5549-17 through 5549-19, 5549-20, 5549-21, 5549-26, 5552-1, 5552-2, and their respective 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.2.5 Particulate Control

- (a) In order to comply with Conditions D.2.1, D.2.2, and D.2.3, the respective baghouses for particulate control, including those integral to the process, shall be in operation and control particulate emissions from the respective facilities listed in this section at all times those facilities are in operation.
- (b) In order to comply with Conditions D.2.1 and D.2.2, the high efficiency cyclones for particulate control shall be in operation and control particulate emissions from facilities 5502-5 and 5502-6 at all times the respective facilities are in operation.

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

D.2.6 Visible Emissions Notations

- (a) Visible emission notations of the exhaust from stacks 42-10, 56-1, 71-7, 71-9, 577-2, 577-5 through 577-10, 5502-3, 5502-5, 5502-6, 5503-1, 5503-2, 5549-3, 5549-4, 5549-7 through 5549-10, 5549-12, 5549-13, 5549-14, 5549-17 through 5549-19, 5549-20, 5549-21, 5549-26, 5552-1, and 5552-2 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take 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.2.7 Parametric Monitoring for Baghouses

- (a) The Permittee shall record the pressure drop across the baghouses used in conjunction with units 56-1, 71-7, 577-2, 5503-6, and 5549-13 at least once per day when units 56-1, 71-7, 577-2, 5503-6, and 5549-13 are in operation. When, for any one reading, the pressure drop across the baghouses are outside the normal range of 1.0 to 8.0 inches of water or a range established during the last stack test, 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. 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.
- (b) The Permittee shall record the pressure drop across the baghouses used in conjunction with units 5503-2, 5503-3, 5503-4, 5549-20, and 5549-21 at least once per day when units 5503-2, 5503-3, 5503-4, 5549-20, and 5549-21 are in operation. When, for any one reading, the pressure drop across the baghouses are outside the normal range of 0.5 to 7.0 inches of water or a range established during the last stack test, 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. 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.
- (c) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with units 5502-3, and 42-10 at least once per day when units 5502-3, and 42-10 are in operation. When, for any one reading, the pressure drop across the baghouses are outside the normal range of 1.0 to 8.0 inches of water or a range established during the last stack test, 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. 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.

- (d) 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, maintained, and operated according to the Preventive Maintenance Plan.

D.2.8 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 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.

D.2.9 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.2.10 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.1(c), the Permittee shall maintain monthly records of the input of starch for unit 5549-13.
- (b) To document the compliance status with Condition D.2.6, the Permittee shall maintain a daily record of visible emission notations of the exhaust from stacks 42-10, 56-1, 71-7, 71-9, 577-2, 577-5 through 577-10, 5502-3, 5502-5, 5502-6, 5503-1, 5503-2, 5549-3, 5549-4, 5549-7 through 5549-10, 5549-12, 5549-13, 5549-14, 5549-17 through 5549-19, 5549-20, 5549-21, 5549-26, 5552-1, and 5552-2. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) To document the compliance status with Condition D.2.7, the Permittee shall maintain a daily record of the pressure drop across the baghouses used in conjunction with units 42-10, 56-1, 71-7, 577-2, 5502-3, 5503-2, 5503-3, 5503-4, 5503-6, 5549-13, 5549-20, and 5549-21. 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) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

The records used to document compliance with Conditions D.1.1(a) are sufficient to document compliance with Conditions D.2.1(b).

D.2.11 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.2.1(b) and (c) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1 (35).

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (rr) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations: [326 IAC 2-7-1(21)(G)(xxiii)]
- (1) One (1) DSE Hopper #9, identified as unit 42-3A, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 6; [326 IAC 6.5-6-25]
 - (2) One (1) DSE Hopper #10, identified as unit 42-3B, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 7; [326 IAC 6.5-6-25]
 - (3) One (1) DSE Hopper #11, identified as unit 42-3C, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 43-3C; [326 IAC 6.5-6-25]
 - (4) One (1) DSE Hopper #12, identified as unit 42-3D, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 9; [326 IAC 6.5-6-25]
 - (5) One (1) DSE Hopper #13, identified as unit 42-3E, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 10; [326 IAC 6.5-6-25]
 - (6) One (1) DSE Hopper #14, identified as unit 42-3F, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 11; [326 IAC 6.5-6-25]
 - (7) One (1) DSE Hopper #2, identified as unit 42-7A, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 14; [326 IAC 6.5-6-25]
 - (8) One (1) DSE Hopper #4, identified as unit 42-7B, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 14; [326 IAC 6.5-6-25]
 - (9) One (1) DSE Hopper #6, identified as unit 42-7C, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 16; [326 IAC 6.5-6-25]
 - (10) One (1) DSE Hopper #1, identified as unit 42-8A, with a maximum throughput of 10 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 17A; [326 IAC 6.5-6-25]
 - (11) One (1) DSE Hopper #3, identified as unit 42-8B, with a maximum throughput of 10 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 17B; [326 IAC 6.5-6-25]

- (12) One (1) DSE Hopper #5, identified as unit 42-8C, with a maximum throughput of 10 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 17C; [326 IAC 6.5-6-25]
- (13) One (1) DSE Hopper #7, identified as unit 42-8D, with a maximum throughput of 10 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 17D; [326 IAC 6.5-6-25]
- (14) One (1) CWS #8; identified as unit 63-1A, with a maximum throughput of 1 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and modified in 1976, and exhausting to stack 46A; [326 IAC 6.5-1-2]
- (15) One (1) CWS South East, identified as unit 63-1B, with maximum throughput of 1 ton/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 46B; [326 IAC 6.5-1-2]
- (16) One (1) CWS South Mill; identified as unit 63-17, constructed in 1977, with a maximum throughput of 0.8 tons/hr, using a baghouse** (replaced baghouse in 2008) for particulate control, and exhausting to stack 53; [326 IAC 6.5-1-2]
- (ss) One (1) Grain Elevator, identified as unit 56-2, with a maximum throughput of 80 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 24; [326 IAC 6.5-6-25]
- (tt) Starch operations, starch drying, starch handling and starch packaging consisting of the following units:
 - (1) One (1) Filter Receiver, identified as 152-1, with a maximum air throughput of 500 dscfm, using a baghouse* for particulate control, constructed in 2002, and exhausting to stack 152-1; [326 IAC 6.5-1-2]
 - (2) One (1) Mixer baghouse, identified as 152-2, with a maximum air throughput of 1,000 dscfm, using a baghouse* for particulate control, constructed in 2002 and approved in 2011 for modification, and exhausting to stack 152-2; [326 IAC 6.5-1-2]
 - (3) One (1) Starch Cooler Filter Receiver, identified as 152-3 (Bld 852), with a maximum air throughput of 589 dscfm, using a baghouse* for particulate control, constructed in 2002, and exhausting to stack 152-3; [326 IAC 6.5-1-2]
 - (4) One (1) Starch Mixer 2 Filter/Receiver, identified as 152-4 (Bld 852A), with a maximum air throughput of 600 dscfm, using a baghouse* for particulate control, constructed on in 2002, and exhausting to stack 152-4; [326 IAC 6.5-1-2]
 - (5) One (1) Starch Mixer 2, identified as 152-5 (Bld 852A), with a maximum air throughput of 1,000 dscfm, using a baghouse* for particulate control, constructed in 2002, and exhausting to stack 152-5; [326 IAC 6.5-1-2]
 - (6) One (1) Starch Storage Hopper, identified as 152-6, with a maximum throughput of 15 tons/hr, using a baghouse** for particulate control, constructed in 2003, and exhausting to stack 152-6; [326 IAC 6.5-1-2]
 - (7) One (1) Starch Filter/Receiver 2 Bld 852, identified as unit 152-7, with a maximum air throughput of 500 dscfm, using a baghouse** for particulate control, constructed in 2004, and exhausting to stack 152-7; [326 IAC 6.5-1-2]

- (8) One (1) Starch Mixer 4 Bld 852A Filter Receiver, identified as unit 152-8, with a maximum air throughput of 600 dscfm, using a baghouse** for particulate control, constructed in 2004, and exhausting to stack 157-8; [326 IAC 6.5-1-2]
- (9) One (1) Starch Mixer 4 Bld 852A, identified as unit 152-9, with a maximum air throughput of 20 dscfm, using a baghouse** for particulate control, constructed in 2004, and exhausting to stack 152-9; [326 IAC 6.5-1-2]
- (10) One (1) Starch Mixer 3 Bld 852A Filter Receiver, identified as unit 152-10, with a maximum air 600 dscfm, using a baghouse** for particulate control, constructed in 2004, and exhausting to stack 152-10; [326 IAC 6.5-1-2]
- (11) One (1) Starch Mixer 3 Bld 852A, identified as unit 152-11, with a maximum air throughput of 1,000 dscfm, using a baghouse* for particulate control, constructed in 2004 and approved in 2011 for modification, and exhausting to stack 152-11; [326 IAC 6.5-1-2]
- (12) One (1) Bulk Bag Receiver, identified as 152-12, with a maximum air throughput of 800 dscfm , using a baghouse * for particulate control, constructed in 2004, and exhausting to stack 157-12; [326 IAC 6.5-1-2]
- (13) One (1) Starch Storage Silo #2 Receiver; identified as Bin TF41820 (formerly unit 61-21), with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed in 1976, modified in 1981, approved in 2010 for additional modification, and exhausting to stack TF41820; [326 IAC 6.5-1-2]
- (14) One (1) Starch Cooling and Conveying System, identified as TF41818 (formerly unit 581-2), with a maximum air throughput of 14,000 dscfm, using a baghouse* for particulate control, constructed in 1983, approved in 2010 for modification, and exhausting to stack TF41818; [326 IAC 6.5-1-2]
- (15) One (1) Blending Bin, identified as 152-15 (formerly unit TF41819), with a maximum air throughput of 4,000 dscfm, using a baghouse* for particulate control, approved in 2010 for construction, and exhausting to stack DC41819 [326 IAC 6.5-1-2]
- (16) One (1) Starch Hopper D/C, identified as 128-3, with a maximum throughput of 12.5 tons/hr, using a baghouse* for particulate control, constructed in 1983 and modified in 2000, and exhausting to stack 128-3; [326 IAC 6.5-1-2]
- (17) One (1) DSW Chemical Blender Bag Slitter, identified as unit 61-15, with a maximum throughput of 7.5 tons/hr, using a baghouse** for particulate control, constructed prior to 1974, and exhausting to stack 35; [326 IAC 6.5-1-2]
- (18) One (1) sodium sulfate conveying system, including a receiver and silo, identified as unit 40-1A and 40-1B, with a maximum throughput of 15 tons/hr, using two baghouses* for particulate control, constructed prior to 1968, modified in 1998, and exhausting to stacks 1A and 1B; [326 IAC 6.5-1-2]
- (19) One (1) DSE North Packer, identified as unit 42-1, with a maximum throughput of 30 tons/hr, using a baghouse* for particulate control, constructed prior to 1968 and modified in 1996, and exhausting to stack 5; [326 IAC 6.5-6-25]

- (20) One (1) DSE Hopper #8, identified as unit 42-4, with a maximum throughput of 13.95 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 17E; [326 IAC 6.5-6-25]
- (21) One (1) DSE Negative Receiver, identified as unit 42-6, with a maximum throughput of 10 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 13; [326 IAC 6.5-6-25]
- (22) One (1) DSE South Packer, identified as unit 42-9, with a maximum throughput of 30 tons/hr, using a baghouse* for particulate control, constructed prior to 1968 and modified in 1996, and exhausting to stack 18; [326 IAC 6.5-1-2]
- (23) One (1) DSE Railcar Loading - East Track, identified as unit 42-11, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 20; [326 IAC 6.5-1-2]
- (24) One (1) DSE Railcar Loading - West Track, identified as unit 42-12, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 21; [326 IAC 6.5-1-2]
- (25) One (1) DSE Bulk Bag System, identified as unit 42-13, with a maximum throughput of 30 tons/hr, using a receiver/baghouse* for particulate control, constructed in 1997, and exhausting to stack 106; [326 IAC 6.5-1-2]
- (26) One (1) Dextrin #1 System Pneumatic, identified as unit 61-3, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1973, and exhausting to stack 27; [326 IAC 6.5-1-2]
- (27) One (1) Dextrin Flash Dryer, identified as unit 61-9, with a maximum throughput of 5 tons/hr, using a cyclone and a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 30; [326 IAC 6.5-6-25]
- (28) One (1) Dextrin #3 System Pneumatic, identified as unit 61-22, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 41; [326 IAC 6.5-1-2]
- (29) One (1) Dextrin #2 System Pneumatic, identified as unit 61-23, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 42; [326 IAC 6.5-1-2]
- (30) One (1) Dextrin #1 System Mixer, identified as unit 61-1, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1973, and exhausting to stack 25; [326 IAC 6.5-1-2]
- (31) One (1) Dextrin #1 System Cookers, identified as unit 61-2, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1973, and exhausting to stack 26; [326 IAC 6.5-1-2]
- (32) One (1) Dextrin #2 System Mixer, identified as unit 61-6, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed in 1974, and exhausting to stack 28; [326 IAC 6.5-6-25]

- (33) Two (2) Dextrin #2 System East and West Batch Bins, identified as units 61-7E and 61-7W, each with a maximum throughput of 5 tons/hr, using two baghouses* for particulate control, constructed in 1974, and exhausting to stacks 29A and 29B; [326 IAC 6.5-1-2]
- (34) One (1) Starch Storage Silo #3 Receiver, identified as unit 61-11, with a maximum throughput of 7.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 31; [326 IAC 6.5-1-2]
- (35) One (1) Starch Storage Silo #1 Receiver, identified as unit 61-12, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 32; [326 IAC 6.5-1-2]
- (36) One (1) Starch Storage Silo #1, identified as unit 61-13, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 33; [326 IAC 6.5-1-2]
- (37) One (1) Dextrin Blend, identified as unit 61-14, with a maximum throughput of 7.5 tons/hr, using hopper/filter receiver using a baghouse** for particulate control, constructed prior to 1973, and exhausting to stack 61-14; [326 IAC 6.5-6-25]
- (38) One (1) DSW Chemical Blender Tank; identified as unit 61-14A, with a maximum throughput of 7.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 34; [326 IAC 6.5-6-25]
- (39) One (1) Dextrin System Acidifiers; identified as unit 61-16, with a maximum air throughput of 1,530 dscfm, using a baghouse* for particulate control, constructed in 1973, and exhausting to stack 36; [326 IAC 6.5-1-2]
- (40) One (1) Dextrin #2 System Cooler; identified as unit 61-18, with a maximum air throughput of 2,300 dscfm, using a baghouse* for particulate control, constructed in 1974, and exhausting to stack 37; [326 IAC 6.5-1-2]
- (41) One (1) Dextrin #3 System Cookers; identified as unit 61-19, with a maximum air throughput of 2,300 dscfm, using a baghouse* for particulate control, constructed in 1974, and exhausting to stack 38; [326 IAC 6.5-1-2]
- (42) One (1) Starch Storage Silo #2; identified as unit 61-20, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 39; [326 IAC 6.5-1-2]
- (43) One (1) Dextrin #3 System Mixer; identified as unit 61-24, with a maximum air throughput of 410 dscfm, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 43; [326 IAC 6.5-1-2]
- (44) One (1) Dextrin #3 System West Batch Bin; identified as unit 61-25, with a maximum air throughput of 350 dscfm, using a baghouse* for particulate control, constructed in 1976, and exhausting to stack 44; [326 IAC 6.5-1-2]
- (45) One (1) Dextrin #3 System East Batch Bin; identified as unit 61-26, with a maximum air throughput of 350 dscfm, using a baghouse** for particulate control, constructed in 1976, and exhausting to stack 45; [326 IAC 6.5-1-2]

- (46) One (1) CWS #7 Dryer Receiver; identified as unit 63-3, with a maximum air throughput of 2000 dscfm, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 47; [326 IAC 6.5-1-2]
- (47) One (1) CWS North Mill, identified as unit 63-4, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 48; [326 IAC 6.5-1-2]
- (48) One (1) CWS North Product, identified as unit 63-5, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1974, and exhausting to stack 49; [326 IAC 6.5-1-2]
- (49) One (1) CWS Packer; identified as unit 63-9, with a maximum throughput of 20 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 50; [326 IAC 6.5-1-2]
- (50) One (1) Liquid Glue Bag Dump; identified as unit 63-12, with a maximum throughput of 8 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 51; [326 IAC 6.5-1-2]
- (51) One (1) CWS #9 and #10 Dryers Receiver; identified as unit 63-15, with a maximum air throughput of 3,600 dscfm, using a baghouse* for particulate control, constructed in 1975 and modified in 2010, and exhausting to stack 52; [326 IAC 6.5-1-2]
- (52) CWS #11, #12, and #13 Dryers; identified as unit 63-16A and 63-16B, each with a maximum air throughput of 3,300 dscfm, using two baghouses* for particulate control, constructed prior to August 7, 1977, and exhausting to stacks 54A and 54B; [326 IAC 6.5-1-2]
- (53) One (1) CWS South Raw Material Dump; identified as unit 63-18, with a maximum throughput of 3.5 tons/hr, using a baghouse** for particulate control, constructed in 1977, and exhausting to stack 55; [326 IAC 6.5-1-2]
- (54) One (1) DSW Negative Receiver; identified as unit 63-20, with a maximum throughput of 5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 56; [326 IAC 6.5-1-2]
- (55) Two (2) DSW Hoppers #17 and #18; identified as unit 71-2A and 71-2B, each with a maximum throughput of 15 tons/hr, using two baghouses* for particulate control, constructed prior to 1968, and exhausting to stacks 58A and 58B; [326 IAC 6.5-6-25]
- (56) One (1) Negative Receiver; identified as unit 71-3, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 71-3; [326 IAC 6.5-1-2]
- (57) One (1) DSW Hopper #13, identified as unit 71-4, with a maximum throughput of 2.5 tons/hr, using a baghouse** for particulate control, constructed prior to 1968, and exhausting to stack 67; [326 IAC 6.5-6-25]
- (58) One (1) DSW Hopper #1; identified as unit 71-5A, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 59; [326 IAC 6.5-6-25]

- (59) One (1) DSW Hopper #2; identified as unit 71-5B, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 60; [326 IAC 6.5-6-25]
- (60) One (1) DSW Hopper #3; identified as unit 71-5C, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 61; [326 IAC 6.5-6-25]
- (61) One (1) DSW Hopper #4; identified as unit 71-5D, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 62; [326 IAC 6.5-6-25]
- (62) One (1) DSW Hopper #5; identified as unit 71-5E, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 63; [326 IAC 6.5-6-25]
- (63) One (1) DSW Hopper #6; identified as unit 71-5F, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 64; [326 IAC 6.5-6-25]
- (64) One (1) DSW Hopper #7; identified as unit 71-5G, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 65; [326 IAC 6.5-6-25]
- (65) One (1) DSW Hopper #8; identified as unit 71-5H, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 66; [326 IAC 6.5-6-25]
- (66) One (1) DSW Hopper #9; identified as unit 71-5I, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 71-5I; [326 IAC 6.5-6-25]
- (67) One (1) DSW Hopper #10; identified as unit 71-5J, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 8; [326 IAC 6.5-6-25]
- (68) One (1) DSW Hopper #11; identified as unit 71-5K, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 69; [326 IAC 6.5-6-25]
- (69) One (1) DSW Hopper #12; identified as unit 71-5L, with a maximum throughput of 2.5 tons/hr, using a baghouse* for particulate control, constructed prior to 1968, and exhausting to stack 70; [326 IAC 6.5-6-25]
- (70) One (1) DSW Bulk Car Loading; identified as unit 71-8, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed in 1971, and exhausting to stack 72; [326 IAC 6.5-1-2]
- (71) One (1) RSP South Bulk Bag Packing; identified as unit 577-1, with a maximum throughput of 15 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 77; [326 IAC 6.5-1-2]

- (72) One (1) FG Bulk Bag Bin Vent Bld 800, identified as unit FA-60582, with a maximum throughput of 18 tons/hr using a baghouse** for particulate control, constructed in 2003, and exhausting to stack FA-60582; [326 IAC 6.5-1-2]
- (73) One (1) RSP South Packing Line, identified as unit 577-3, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 79; [326 IAC 6.5-1-2]
- (74) One (1) RSP Bulk Loading System A; identified as unit 577-4, with a maximum throughput of 18 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 80; [326 IAC 6.5-1-2]
- (75) One (1) RSP Bulk Loading Fugitive Dust Collector**; identified as unit 577-4A, with a maximum throughput of 18 tons/hr and an actual throughput of 18 lbs/hr, constructed in 1986, and exhausting to stack 81; [326 IAC 6.5-1-2]
- (76) One (1) CSW conveying cyclone operation, identified as unit 578-1, with a maximum throughput of 7.5 tons/hr, using a baghouse** for particulate control, returned to service in 2008, and exhausting through stack 578-1. [326 IAC 6.5-1-2]
- (77) One (1) CWS Packing Hopper; identified as unit 578-2, with a maximum throughput of 1 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 89; [326 IAC 6.5-1-2]
- (78) One (1) CWS Milling System, identified as unit 578-3, with a maximum throughput of 1.5 tons/hr, using a baghouse* for particulate control, constructed in 1978, and exhausting to stack 90; [326 IAC 6.5-1-2]
- (79) One (1) Base Blending Bin 158-5, identified as unit TF31901, with a maximum air throughput of 2,000 dscfm, using product recovery DC-31901** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 1-158; [326 IAC 6.5-1-2]
- (80) One (1) Base Bin 158-1, identified as unit TF31902, with a maximum air throughput of 200 dscfm, using product recovery DC-31901** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 2-158; [326 IAC 6.5-1-2]
- (81) One (1) Product Bin 158-2, identified as unit TF31991, with a maximum air throughput of 200 dscfm, using product recovery DC-31991** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 3-158; [326 IAC 6.5-1-2]
- (82) One (1) Surge Tank Bin 158-3, identified as unit SH31913, with a maximum air throughput of 200 dscfm, using product recovery DC-31911** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 7-158; [326 IAC 6.5-1-2]
- (83) One (1) Bulk Bag Unload Bin 158-4, identified as unit DC-31900 (Bld 630) with a maximum air throughput of 600 dscfm, using a dust collector* for particulate control, constructed in 2004, and exhausting to stack 8-158; [326 IAC 6.5-1-2]
- (84) One (1) FBR exhaust, identified as unit TR31912, with a maximum air throughput of 8,800 dscfm, using product recovery metal filters** (Bld 630) for particulate control, constructed in 2004, and exhausting to stack 5-158 [326 IAC 6.5-1-2]

- (85) One (1) FBR Cooling System, identified as TR31913, approved in 2014 for installation, with a product throughput of 15,000 pounds per hour, using a cyclone (CY31917)* and baghouse (DC31917)* for product recovery and particulate control, and exhausting to stack 9-158.
- (86) One (1) starch dryer, identified as unit T-1, with a maximum production rate of 300 lbs/hr, using a product collector/cyclone and dust collector* for particulate control, constructed in 2005, and exhausting to stack T-1; [326 IAC 6.5-1-2]
- (87) One (1) Line 1 South Packing Hopper, identified as unit 5549-22, with a maximum air throughput of 4,800 dscfm, using a baghouse* for particulate control, constructed in 2006, and exhausting to stack 5549-22. [326 IAC 6.5-1-2]

*The control device is considered both integral to the process and inherent to the process for CAM applicability. Inherent process equipment is not subject to Compliance Assurance Monitoring (CAM).

**The control device is considered inherent to the process for CAM applicability. Inherent process equipment is not subject to Compliance Assurance Monitoring (CAM).

Emissions Unit Description: Specifically Regulated Insignificant Activities

- (a) Combustion related activities including spaces heaters, process heaters, or boilers using natural gas-fired with heat input equal to or less than ten million (10,000,000) British thermal units per hour;
 - (1) One (1) process heater, Bld 630, natural gas fired, with maximum heat input capacity of 5.1 MMBtu/hr, identified as unit YX31914A, constructed in 2004 and venting out stack 158-6. [326 IAC 6-2-4]
- (b) Cleaners and solvents, from operations M1 through M4 and RSP shop, characterized as:
 - (1) having a vapor pressure equal to or less than two (2.0) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pound per square inch) measured at thirty-eight (38) degrees Centigrade (one hundred (100) degrees Fahrenheit); or
 - (2) having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit);

the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months. [326 IAC 8-3-2] [326 IAC 8-3-8]

(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 2-7-5(1)]

D.3.1 PSD and Nonattainment NSR Minor Limits [326 IAC 2-2] [326 IAC 2-1.1-5]

- (a) In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the PM, PM10 and PM2.5 emissions from stacks TF41818, DC41819, and TF41820 shall be less than the emission limits listed in the table below:

Equipment Description	Stack ID	PM Emission Limit (lb/hr)	PM10 Emission Limit (lb/hr)	PM2.5 Emission Limit (lb/hr)
One (1) Starch Cooling and Conveying System	stack TF41818	3.97	2.38	1.59
One (1) Blending Bin	stack DC41819	1.12	0.67	0.45
One (1) Starch Storage Silo #2 Receiver	stack TF41820	0.55	0.33	0.22

Compliance with the above limits will ensure that the potential to emit from this modification is less than twenty-five (25) tons of PM per year, less than fifteen (15) tons of PM₁₀ per year, and less than ten (10) tons of PM_{2.5} per year; and therefore will render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

- (b) In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the PM, PM10 and PM2.5 emissions shall be less than the emission limits listed in the table below:

Unit Number	Stack ID	PM Emission Limit (lb/hr)	PM10 Emission Limit (lb/hr)	PM2.5 Emission Limit (lb/hr)
40-1A	stack 40-1A	0.13	0.13	0.13
40-1B	stack 40-1B	0.13	0.13	0.13
152-7	stack 152-7	0.43	0.30	0.17
152-8	stack 157-8	0.52	0.36	0.21
152-9	stack 152-9	0.10	0.05	0.05
152-10	stack 152-10	0.52	0.36	0.21
152-11	stack 152-11	0.86	0.60	0.34
FA-60582	stack FA-60582	1.63	0.80	0.65
152-12	stack 157-12	0.69	0.48	0.28
42-13	stack 106	0.50	0.10	0.10

Compliance with these limits, shall limit the PM emissions to less than 25 tons per year, PM10 emissions to less than 15 tons per year and PM2.5 emissions to less than 10 tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) rules and the requirements of 326 IAC 2-1.1-5 (Nonattainment NSR) do not apply to this modification.

- (c) In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the PM, PM10, and PM2.5 emissions from TR31913 shall be less than the emission limits listed in the table below:

Unit Number	PM Emission Limit (lb/hr)	PM10 Emission Limit (lb/hr)	PM2.5 Emission Limit (lb/hr)
TR31913	1.71	1.71	1.71

Compliance with these limits, shall limit the emissions increase of the modification to less than twenty-five (25) tons of PM, fifteen (15) tons of PM10, and ten (10) tons of PM2.5 per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the modification.

D.3.2 Particulate Matter [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, the particulate matter emissions from units 40-1A, 40-1B, 42-6, 42-9, 42-11, 42-12, 42-13, 61-1, 61-2, 61-3, 61-7, 61-11, 61-12, 61-13, 61-15, 61-16, 61-18 through 61-20, 61-22, 61-23, 61-24 through 61-26, 63-1A, 63-4, 63-5, 63-6, 63-9, 63-12, 63-15, 63-16, 63-17, 63-18, 63-20, 71-3, 71-4A, 71-8, 128-3, 152-1 through 152-12, 577-1, 577-3, 577-4, 577-4A, 578-1, 578-2, 578-3, 5549-22, DC-31900, FA-60582, SH31913, TF31901, TF31902, TR31912, TR31913, TF31991, T-1, TF41818, TF41819 and TF41820 shall each not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

D.3.3 Particulate Matter [326 IAC 6.5-6-25]

Pursuant to 326 IAC 6.5-6-25, the following insignificant activities are limited as indicated in the table below:

Facility	PM Limit (gr/dscf)	PM Limit (ton/yr)
56-2	0.01	11.3
71-2	0.03	2.6
61-6	0.03	0.1
61-14A	0.029	0.6
61-14	0.028	1.2
42-4	0.029	2.3
61-9	0.016	4.1
42-1	0.03	0.9
42-6	0.03	2.5
42-8	0.03	4.2
42-7A	0.032	1.7
42-7B	0.032	1.7
42-7C	0.032	1.7
42-3A	0.032	1.8
42-3B	0.032	1.8
42-3C	0.032	1.8
42-3D	0.032	1.8
42-3E	0.032	1.8
42-3F	0.032	1.8
71-4A	0.026	0.3
71-5A	0.026	0.3
71-5B	0.026	0.3
71-5C	0.026	0.3
71-5D	0.026	0.3
71-5E	0.026	0.3

Facility	PM Limit (gr/dscf)	PM Limit (ton/yr)
71-5F	0.026	0.3
71-5G	0.026	0.3
71-5H	0.026	0.3
71-5I	0.026	0.3
71-5J	0.026	0.3
71-5K	0.026	0.3
71-5L	0.026	0.3

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

D.3.5 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the process heater, identified as YX31914A, shall each be limited to 0.71 pound per MMBtu heat input, which was calculated using the following equation:

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

D.3.6 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control and Equipment Operating Requirements), the Permittee shall:

- (a) Ensure the following control equipment and operating requirements are met:
 - (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Ensure the following additional control equipment and operating requirements are met:
 - (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9)

degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
 - (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

D.3.7 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

Compliance Determination Requirements

D.3.8 Particulate Control

In order to ensure compliance with Conditions D.3.1, D.3.2, and D.3.3, the cyclones and baghouses for particulate control, including those integral to the process, shall be in operation and control particulate emissions from all facilities listed in this section at all times those respective facilities are in operation.

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

D.3.9 Visible Emissions Notations

- (a) Visible emission notations of the exhaust from stacks 40-1A, 40-1B, 152-7, 157-8, 152-9, 152-10, 152-11, FA-60582, 157-12, 53, (unit 63-17) and 106 (unit 42-13) shall be performed once per week 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.3.10 Parametric Monitoring for Baghouses

- (a) The Permittee shall record the pressure drop across the baghouses used in conjunction with units TF41818, TF41819, TF41820, and TR31913 at least once per week when units TF41818, TF41819, TF41820, and TR31913 are in operation. When, for any one reading, the pressure drop across a baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for these units is a pressure drop between 1.0 and 8.0 inches of water, unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated, maintained, and operated according to the Preventive Maintenance Plan.

D.3.11 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 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.

D.3.12 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.3.13 Record Keeping Requirements

- (a) To document the compliance status with Condition D.3.9, the Permittee shall maintain a weekly record of visible emission notations of the exhaust from stacks 40-1A, 40-1B, 152-7, 157-8, 152-9, 152-10, 152-11, FA-60582, 157-12, and 106. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

- (b) To document the compliance status with Condition D.3.10, the Permittee shall maintain a weekly record of the pressure drop across the baghouses used in conjunction with units TF41818, TF41819, TF41820, and TR31913. 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.3.7, on and after January 1, 2015, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase.
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION E.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]

(a) Stationary fire pump engines, including:

- (1) One (1) 210-horsepower diesel-fired emergency fire pump engine, identified as FP1, constructed in 2003;

Under 40 CFR 63, Subpart ZZZZ, this is an affected facility.

- (2) One (1) 300-horsepower diesel-fired emergency fire pump engine, identified as FP2, constructed in 2003; and

Under 40 CFR 63, Subpart ZZZZ, this is an affected facility.

- (3) One (1) 300-horsepower diesel-fired emergency fire pump engine, identified as FP3, constructed in 2006.

Under 40 CFR 63, Subpart ZZZZ, this is an affected facility.

Under 40 CFR 60, Subpart IIII, this is an affected facility.

(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 2-7-5(1)]

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

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to the one (1) diesel-fired emergency fire pump engine, identified as FP3, except when otherwise specified in 40 CFR Part 60, Subpart IIII.

E.1.2 Stationary Compression Ignition Internal Combustion Engines NSPS Requirements [40 CFR Part 60, Subpart IIII]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart IIII (included as Attachment A), except as otherwise specified in 40 CFR Part 60, Subpart IIII:

- (1) 40 CFR 60.4200 (a)(2)(ii)
- (2) 40 CFR 60.4205 (c)
- (3) 40 CFR 60.4206
- (4) 40 CFR 60.4207 (b)
- (5) 40 CFR 60.4208
- (6) 40 CFR 60.4209 (a)
- (7) 40 CFR 60.4211 (a),(b),(f),(g)(2)
- (8) 40 CFR 60.4214 (b)
- (9) 40 CFR 60.4218
- (10) 40 CFR 60.4219
- (11) Table 8

SECTION E.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]

(a) Stationary fire pump engines, including:

- (1) One (1) 210-horsepower diesel-fired emergency fire pump engine, identified as FP1, constructed in 2003;

Under 40 CFR 63, Subpart ZZZZ, this is an affected facility.

- (2) One (1) 300-horsepower diesel-fired emergency fire pump engine, identified as FP2, constructed in 2003; and

Under 40 CFR 63, Subpart ZZZZ, this is an affected facility.

- (3) One (1) 300-horsepower diesel-fired emergency fire pump engine, identified as FP3, constructed in 2006.

Under 40 CFR 63, Subpart ZZZZ, this is an affected facility.

Under 40 CFR 60, Subpart IIII, this is an affected facility.

(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 2-7-5(1)]

E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants (NESHAP) [326 IAC 20-82] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the three (3) diesel-fired emergency fire pump engines, identified as FP1, FP2, and FP3, except when otherwise specified in 40 CFR 63, Subpart ZZZZ.

E.2.2 Stationary Reciprocating Internal Combustion Engines NESHAPS Requirements [40 CFR 60, Subpart ZZZZ]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment B of this permit), except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ

For FP-1 and FP-2:

- (1) 40 CFR 63.6580
- (2) 40 CFR 63.6585
- (3) 40 CFR 63.6590 (a)(1)(iii) and (iv)
- (4) 40 CFR 63.6595 (a)(1), (b), and (c)
- (5) 40 CFR 63.6603 (a)
- (6) 40 CFR 63.6605
- (7) 40 CFR 63.6625 (e)(3),(f),(h),(i)
- (8) 40 CFR 63.6635
- (9) 40 CFR 63.6640 (a),(b),(e), and (f)
- (10) 40 CFR 63.6645 (a)(5)
- (11) 40 CFR 63.6650 (d), (f)
- (12) 40 CFR 63.6655 (a), (d), (e)(3), (f),(2)
- (13) 40 CFR 63.6660
- (14) 40 CFR 63.6665

- (15) 40 CFR 63.6670
- (16) 40 CFR 63.6675
- (17) Table 2d (item 4)
- (18) Table 6 (item 9)
- (19) Table 8

For FP3:

- (1) 40 CFR 63.6580
- (2) 40 CFR 63.6585
- (3) 40 CFR 63.6590(a)(2)(iii) and (c)(1)
- (4) 40 CFR 63.6595(a)(6)
- (5) 40 CFR 63.6665
- (6) 40 CFR 63.6670
- (7) 40 CFR 63.6675

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Ingredion Incorporated Indianapolis Plant
Source Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-26765-00042

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:

Phone:

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**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Ingredion Incorporated Indianapolis Plant
Source Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-26765-00042

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
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**

Part 70 Quarterly Report

Source Name: Ingredion Incorporated Indianapolis Plant
Source Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-26765-00042
Facilities: 5502-1A, 5502-1B, 5502-1D, 5502-3, 5502-4, 5502-5, 5502-6, 5502-7, 5503-1, 5503-2, 5503-3, 5503-4, 5503-5, and 5503-6
Parameter: Combined input of corn grind in bushels per twelve consecutive month period
Limit: The combined input of corn grind to units 5502-1A, 5502-1B, 5502-1C, 5502-3, 5502-4, 5502-5, 5502-6, 5502-7, 5503-1, 5503-2, 5503-3, 5503-4, 5503-5, and 5503-6 shall not exceed 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Corn grind (bushels)	Corn grind (bushels)	Corn grind (bushels)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Ingredion Incorporated Indianapolis Plant
Source Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-26765-00042
Facilities: 5549-1 and 5549-2
Parameter: Combined input of starch in tons per twelve consecutive month period
Limit: The combined input of starch for units 5549-1 and 5549-2 shall not exceed 22,500 tons per twelve consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Starch (tons)	Starch (tons)	Starch (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report

Source Name: Ingredion Incorporated Indianapolis Plant
Source Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-26765-00042
Facilities: 5502-1A, 5502-1B, 5502-1C, and 5502-1D
Parameter: Total natural gas usage
Limit: The combined input of natural gas to 5502-1A, 5502-1B, 5502-1C, and 5502-1D shall not exceed 1,780 million cubic feet (MMcf) per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit is equivalent to total NO_x emissions of less than or equal to 39 tons per twelve consecutive month period.

QUARTER: _____ YEAR: _____

Month	Natural Gas (MMscf)	Natural Gas (MMscf)	Natural Gas (MMscf)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report

Source Name: Ingredion Incorporated Indianapolis Plant
Source Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-26765-00042
Facilities: 5549-13
Parameter: Input of starch in tons per twelve consecutive month period
Limit: The input of starch to unit 5549-13 shall not exceed 14,010 tons per twelve consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Starch (tons)	Starch (tons)	Starch (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report

Source Name: Ingredion Incorporated Indianapolis Plant
Source Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-26765-00042
Facility: 575-2
Parameter: Amount of dry product processed in tons per twelve consecutive month period
Limit: The amount of dry product processed by unit 575-2 shall not exceed 123,300 tons per twelve month consecutive period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Dry product (tons)	Dry product (tons)	Dry product (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Ingredion Incorporated Indianapolis Plant
Source Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-26765-00042
Facility: 40-3
Parameter: Amount of starch produced tons per twelve consecutive month period
Limit: The starch produced from unit 40-3 shall not exceed 145,610 tons per twelve consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Starch produced (tons)	Starch produced (tons)	Starch produced (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Ingredion Incorporated Indianapolis Plant
Source Address: 1515 South Drover Street, Indianapolis, Indiana 46221
Part 70 Permit No.: T097-26765-00042

Months: _____ to _____ Year: _____

Page 1 of 2

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

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: _____

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

**Technical Support Document (TSD) for a Part 70 Minor Source
Modification and Significant Permit Modification**

Source Description and Location

Source Name:	Ingredion Incorporated Indianapolis Plant
Source Location:	1515 S Drover Street, Indianapolis, IN 46221
County:	Marion (Center Township)
SIC Code:	2046 (Wet Corn Milling)
Operation Permit No.:	T097-26765-00042
Operation Permit Issuance Date:	April 16, 2010
Minor Source Modification No.:	097-34531-00042
Significant Permit Modification No.:	097-34603-00042
Permit Reviewer:	Laura Spriggs Thompson

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T097-26765-00042 on April 16, 2010. The source has since received the following approvals:

Permit Type	Permit Number	Issuance Date
Administrative Amendment	097-29351-00042	July 19, 2010
Administrative Amendment	097-29768-00042	October 18, 2010
Significant Permit Modification	097-29534-00042	November 22, 2010
Significant Permit Modification	097-29836-00042	April 04, 2011
Administrative Amendment	097-30416-00042	April 11, 2011
Significant Permit Modification	097-30227-00042	October 12, 2011
Significant Permit Modification	097-31372-00042	April 30, 2012
Administrative Amendment	097-32047-00042	June 29, 2012
Administrative Amendment	097-33118-00042	June 24, 2013

County Attainment Status

The source is located in Marion County, Center Township.

Pollutant	Designation
SO ₂	Non-attainment effective October 4, 2013, for the Center Township, Perry Township, and Wayne Township. Better than national standards for the remainder of the of the county.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
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.

Pollutant	Designation
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.

- (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. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 Marion County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **SO₂**
 U.S. EPA, in the Federal Register Notice 78 FR 47191 dated August 5, 2013, has designated Marion County, Center Township as nonattainment for SO₂. Therefore, SO₂ emissions were reviewed pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (d) **Other Criteria Pollutants**
 Marion County has been classified as attainment or unclassifiable in Indiana for CO, PM₁₀, NO₂, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Source Status - Existing Source

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

Pollutant	Emissions (ton/yr)
PM	Greater than 250
PM ₁₀	Greater than 250
PM _{2.5}	Greater than 250
SO ₂	Greater than 25, Less than 100
NO _x	Greater than 100, Less than 250
VOC	Greater than 25, Less than 100
CO	Greater than 100, Less than 250
GHGs as CO ₂ e	Greater than 100,000

Pollutant	Emissions (ton/yr)
Single HAP	Less than 10
Total HAPs	Less than 25

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a 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) The source-wide GHG emissions are equal to or greater than one hundred thousand (>100,000) tons of CO₂ equivalent (CO₂e) emissions per year. GHG emissions do not affect the source PSD status.
- (c) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3) because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (d) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (e) These emissions are based upon the technical support document for Significant Permit Modification No. 097-30227-00042, issued on October 12, 2011.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Ingredion Incorporated Indianapolis Plant on May 13, 2014, relating to the addition of a FBR Cooling System. In the existing system, product material is cooled in batch mode operation in a surge hopper. The proposed FBR Cooling System will involve pneumatically conveying the product to an existing transfer system, eliminating the hold time in the surge hopper.

The proposed system is described as follows:

One (1) FBR Cooling System, identified as TR31913, approved in 2014 for installation, with a product throughput of 15,000 pounds per hour, using a cyclone (CY31917)* and baghouse (DC31917)* for product recovery and particulate control, and exhausting to stack 9-158.

*The control device is considered both integral to the process and inherent to the process for CAM applicability. Inherent process equipment is not subject to Compliance Assurance Monitoring (CAM). See the discussions to follow.

The addition of the FBR Cooling System will allow for additional product to be produced, which affects units upstream and downstream of the FBR Cooling System. Therefore, this modification also affects the following existing units even though these units are not being physically modified:

- #4 Starch Flash Dryer (575-1)
- #5 Starch Flash Dryer (575-2)
- #6 Starch Flash Dryer (575-3)
- RSP Hoppers #1 - #6 (577-5, 577-6, 577-7, 577-8, 577-9, 577-10)
- RSP Bulk Loading System (577-4)
- RSP Bulk Loading Fugitive Dust Collector (577-4A)
- DSE Railcar Loading - West Track (42-12)
- RSP North Packing Line (577-2)
- Surge Tank Bin 158-3 (SH31913)

- FBR Exhaust (TR31912)
- Bulk Bag Unload Bin 158-4 (DC-31900)
- Base Bin 15-1 (TF31902)
- Base Blending Bin 158-5 (TF31901)

“Integral Part of the Process” Determination

The Permittee has submitted the following information to justify that the cyclone and baghouse should be considered integral to the FBR Cooling System (TR31913).

1. Is the primary purpose of the equipment to control air pollution?

In the existing system, product material from the FBR is dropped into a surge hopper and is cooled in batch mode operation. The product is then sent to a rail loadout. Both the surge hopper and the rail loadout use controls that have been determined to be integral to the process and/or inherent process equipment. In order to gain some additional capacity, Ingredion would like to cool the product while pneumatically conveying it to product loadout. This will eliminate the hold time in the surge hopper and allow for additional FBR product to be processed.

The cooling system will consist of a long stretch of ductwork, ending in a cyclone and baghouse to recover product and drop it into an existing transfer system. Product will be cooled in the air stream used for conveyance, with the cyclone helping to pull the air and product through the ductwork. The primary purpose of the cyclone and baghouse are not air pollution control, but rather to help cool and recover valuable product, which would otherwise be emitted to the atmosphere via entrainment in process air.

2. Where the equipment is recovering product, how do cost savings from the product compare to the cost of the equipment?

The recovery of product from the proposed FBR Cooling System by the cyclone and baghouse will yield substantial material cost savings for the Permittee that far outweigh the cost of purchasing and maintaining the baghouse. The Permittee provided the following information regarding the amount of material recovered by the cyclone and baghouse as well as the value of the product recovered and the annual cost of the baghouse.

Product Recovered by Cyclone and Baghouse

Maximum Product Throughput (ton/yr)	Cyclone CE	Product Recovered by Cyclone (ton/yr)	Product Routed to Baghouse (ton/yr)	Baghouse CE	Product Recovered by Baghouse (ton/yr)
18500	90%	16650	1850	99.0%	1831.5

Product Recovery Value and Baghouse Cost

Value of Product (\$/lb)	Value of Product (\$/ton)	Cyclone Product Recovery Value (\$/yr)	Baghouse Product Recovery Value (\$/yr)	Total Annual Cost of Baghouse (\$/yr)
\$0.54	\$1,080.00	\$17,982,000.00	\$1,978,020.00	\$52,543.53

Appendix B of this Technical Support Document provides a more detailed economic analysis.

3. Would the equipment be installed if no air quality regulations were in place?

As the primary purpose of the cyclone and baghouse is to cool and recover product and there is a significant cost advantage to do so, there is a significant incentive for the Permittee to operate the cyclone and baghouse even if no regulatory requirements existed.

IDEM, OAQ has evaluated the information submitted and agrees that the cyclone and baghouse should be considered an integral part of the FBR Cooling System. This is supported by the fact that the existing surge bin and rail loadout have controls that have been determined to be integral to the process and/or inherent process equipment. Therefore, the Part 70 permitting level will be determined using the potential to emit after the cyclone and baghouse. Operating conditions in the proposed permit will specify that the cyclone and baghouse shall operate at all times when the FBR Cooling System is in operation.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

Increase in PTE Before Controls of the Modification*	
Pollutant	Potential To Emit (ton/yr)
PM	6.57
PM ₁₀	6.57
PM _{2.5}	6.57
SO ₂	--
VOC	--
CO	--
NO _x	--
Single HAPs	--
Total HAPs	--

*The cyclone and baghouse have been determined to be integral to the process; therefore, the PTE shown is after the cyclone and baghouse for purposes of Part 70 Permit Level Determination.

Appendix A of this TSD reflects the unrestricted potential emissions of the modification.

This source modification is subject to 326 IAC 2-7-10.5(e)(1)(A) because the modification has a potential to emit less than twenty-five (25) tons and equal to or greater than five (5) tons per year PM, PM10, and PM2.5, each. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a Significant Modification issued pursuant to 326 IAC 2-7-12(d) because the modification requires a case-by-case determination of an emission limitation.

Permit Level Determination – PSD

PSD Hybrid Test

The Permittee has provided information as part of the application for this approval that, based on the hybrid test in 326 IAC 2-2-2(d)(5), this modification at a major stationary source will not be major for Prevention of Significant Deterioration under 326 IAC 2-2-1. IDEM, OAQ has not reviewed this information and will not be making any determination in this regard as part of this approval. The applicant will be required to keep records and report in accordance with Source obligation in 326 IAC 2-2-8. See Appendix A of this Technical Support Document for the detailed analysis.

Process / Emission Unit	Emissions Increases (ton/yr)							
	PM	PM ₁₀	PM _{2.5} *	SO ₂	VOC	CO	NO _x	GHGs
Existing Units								
#4-#6 Starch Flash Dryers (575-1 to 575-3)	1.79	1.53	0.26	--	--	--	--	--
RSP Hopper #1-#6 (577-5 to 577-10)	0.01	0.004	0.01	--	--	--	--	--
RSP Bulk Loading System A (577-4)	0.003	0.002	0.002	--	--	--	--	--
RSP Bulk Loading Fugitive Dust Collector (577-4A)	0.002	0.0006	0.0009	--	--	--	--	--
DSE Railcar Loading - West Track (42-12)	0.003	0.001	0.002	--	--	--	--	--
RSP North Packing Line (577-2)	0.22	0.20	0.02	--	--	--	--	--
Surge Tank Bin 158-3 (SH31913)	0.02	0.02	0.0005	--	--	--	--	--
FBR Exhaust (TR31912)	1.58	1.48	0.09	--	--	--	--	--
Bulk Bag Unload Bin 158-4 (DC-31900)	0.01	0.01	0.002	--	--	--	--	--
Base Bin 158-1 (TF31902)	0.01	0.01	0.0005	--	--	--	--	--
Base Blending Bin 158-5 (TF31901)	0.04	0.04	0.01	--	--	--	--	--
New Units								
FBR Cooling System (TR31913)	7.49	7.49	7.49	--	--	--	--	--
Total Emissions Increase for the Modification	11.19	10.79	7.89	--	--	--	--	--
PSD Significant Thresholds	25	15	10	--	40	100	40	75,000 CO ₂ e

Process / Emission Unit	Emissions Increases (ton/yr)							
	PM	PM ₁₀	PM _{2.5} *	SO ₂	VOC	CO	NO _x	GHGs
Emission Offset Major Source Threshold	--	--	--	100	--	--	--	--
Subject to Regulation	---	---	---	---	---	---	---	75,000 CO ₂ e

*PM_{2.5} listed is direct PM_{2.5}.

(a) This modification to an existing major PSD stationary source is not major because:

- (1) The emissions increase of each PSD regulated pollutant, excluding GHGs, are less than the PSD significant thresholds; and
- (2) The emissions increase of GHGs from this modification to an existing major PSD source are less than seventy-five thousand (75,000) tons of CO₂ equivalent (CO₂e) 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.

(b) This modification to an existing minor Emission Offset stationary source is not major because the emissions increase of SO₂ is less than the Emission Offset major source thresholds. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Since this source is considered a major PSD source and the unrestricted potential to emit of this modification is greater than twenty-five (25) tons of PM per year, fifteen (15) tons of PM₁₀ per year, and ten (10) tons of direct PM_{2.5} per year, this source has elected to limit the potential to emit of this modification as follows:

PM, PM₁₀, and PM_{2.5} emissions from the FBR Cooling System (TR31913) shall be less than the emission limits listed in the table below:

Unit Number	PM Emission Limit (lb/hr)	PM ₁₀ Emission Limit (lb/hr)	PM _{2.5} Emission Limit (lb/hr)
TR31913	1.71	1.71	1.71

Compliance with these limits, shall limit the emissions increase of the modification to less than twenty-five (25) tons of PM, fifteen (15) tons of PM₁₀, and ten (10) tons of PM_{2.5} per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the modification.

Discussion of Concurrent Projects

Millhouse Reconfiguration - Review Request No. 097-34373-00042, issued on May 7, 2014

Ingredion operated two millhouses at the Indianapolis Plant, the West Millhouse and Process A Millhouse (PA Millhouse), until November 2012, when Ingredion shut down the PA Millhouse.

Following the PA Millhouse shutdown, Ingredion is reconfiguring the West Millhouse to allow for an increased throughput of 50,000 bushels per day, which represents an increase in West Millhouse capacity but an overall decrease in the combined PA Millhouse and West Millhouse capacity. The reconfiguration will involve the addition of new equipment, the re-service of equipment from the PA Millhouse, and the placing of current spare equipment into service. No changes will be made to equipment upstream or downstream of the West Millhouse. Because the feeds to and from the West Millhouse were previously shared with the feeds to and from the PA Millhouse, the equipment upstream and downstream of the West Millhouse will not see an increase in throughput that may be attributed to the PA Millhouse shutdown and West Millhouse

expansion.

The West Millhouse reconfiguration is not related to the proposed addition of a FBR Cooling System. The FBR Cooling System project was approved internally as a standalone project, and the financial justification for the capital approval is not dependent on any other past, present, or future capital projects at the Indianapolis Plant. Furthermore, as described above, equipment upstream and downstream of the West Millhouse, including the proposed FBR Cooling System and associated emission units, will not see an increase in throughput that may be attributed to the PA Millhouse shutdown and West Millhouse expansion.

Spray Dryer Throughput Limit Increase - Significant Permit Modification No. 097-34377-00042

Ingredion has proposed to increase the combined maximum throughput limit for the #1 and #2 Spray Dryers (identified as 5549-1 and 5549-2) at the Indianapolis Plant. The combined maximum throughput limit in Condition D.1.1(a)(2) of the Indianapolis Plant's current Title V permit is 22,500 tons per 12 consecutive months. This limit restricts operations of the Indianapolis Plant such that process shutdowns are required to avoid exceeding the limit.

Ingredion has proposed to increase the combined maximum throughput limit for the #1 and #2 Spray Dryers to 30,000 tons per 12 consecutive months.

The #1 and #2 Spray Dryer throughput limit increase project is not related to the proposed addition of a FBR Cooling System. The FBR Cooling System project was approved internally as a standalone project, and the financial justification for the capital approval is not dependent on any other past, present, or future capital projects at the Indianapolis Plant. Furthermore, the FBR Cooling System is fed by the #4, #5, and #6 Starch Flash Dryers (575-1, 575-2, 575-3), not by the #1 and #2 Spray Dryers (5549-1, 5549-2). Therefore, the FBR Cooling System will not see an increase in throughput that may be attributed to the proposed increase in the maximum throughput for the #1 and #2 Spray Dryers.

Federal Rule Applicability Determination

The following is a discussion of the federal rule applicability to the source due to this modification:

New Source Performance Standards (NSPS):

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.

Compliance Assurance Monitoring (CAM)

- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
- (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

CAM Applicability Analysis							
Emission Unit - Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
FBR Cooling System (TR31913) - PM	N*	Y	6.57	6.57	100	N	N
FBR Cooling System (TR31913) - PM10	N*	Y	6.57	6.57	100	N	N
FBR Cooling System (TR31913) - PM2.5	N*	Y	6.57	6.57	100	N	N

*The cyclone and baghouse used for product recovery for the FBR Cooling System have been determined to be inherent process equipment as defined in 40 CFR 64.1.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to the FBR Cooling System as part of this modification.

Inherent Process Equipment Determination

The Permittee has submitted the following information to justify that the cyclone and baghouse should be considered inherent process equipment of the FBR Cooling System (TR31913).

Pursuant to 40 CFR 64.1:

Inherent process equipment means equipment that is necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations. Equipment that must be operated at an efficiency higher than that achieved during normal process operations in order to comply with the applicable emission limitation or standard is not inherent process equipment. For the purposes of this part, inherent process equipment is not considered a control device.

As documented in the "Integral Part of the Process" Determination, the primary purpose of the cyclone and baghouse for the FBR Cooling System is product cooling and recovery and not compliance with air pollution regulations. The process simply consists of pneumatically conveying product to an existing transfer system to more efficiently cool the material and allow for increased processing of FBR product. The cyclone and baghouse will be used to capture and recover valuable product. The cost analysis shown in the Integral Part of the Process Determination shows that the value of recovered product far outweighs the annualized cost of the baghouse. Therefore, for purposes of 40 CFR 64, CAM, the cyclone and baghouse are considered inherent process equipment and are not considered control devices.

State Rule Applicability Determination

The following is a discussion of the state rule applicability to the source due to the modification:

326 IAC 2-2 and 2-3 (PSD and Emission Offset)

PSD and Emission Offset applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the FBR Cooling System (TR31913) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of PM10 is greater than 250 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(1), annual reporting is required. An emission statement shall be submitted by July 1, 2015, and every year thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Ingredion Incorporated Indianapolis Plant is subject to the requirements of 326 IAC 6.5 because the source has the potential to emit 100 tons or more of PM per year. The source has facility-specific emission limitations in 326 IAC 6.5-2-6-25; however, the FBR Cooling System (TR31913) is not specifically listed. Therefore, pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the FBR Cooling System (TR31913) shall not exceed 0.03 grain per dry standard cubic foot. The Permittee has indicated that the baghouse is designed to achieve an outlet grain loading of 0.01 gr/dscf. Therefore, the FBR Cooling System is capable of complying with 326 IAC 6.5-1-2(a).

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(c)(3), the requirements of 326 IAC 6-3 shall not apply if a particulate matter limitation established in 326 IAC 6.5 is as stringent or more stringent than the particulate limitation established in 326 IAC 6-3. The particulate limit established in 326 IAC 6.5 is more stringent than the limitation that would be established in 326 IAC 6-3. Therefore, the requirements of 326 IAC 6-3 are not applicable to the FBR Cooling System (TR31913).

326 IAC 8 (VOC Rules)

The FBR Cooling System (TR31913) does not have potential VOC emissions. Therefore, no 326 IAC 8 rules are applicable to the FBR Cooling System.

Compliance Determination and Monitoring Requirements

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

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

The Compliance Determination Requirements applicable to this modification are as follows:

In order to comply with the 326 IAC 2-2 PSD minor emission limitations and the 326 IAC 6.5 emission limitation, the cyclone and baghouse shall be in operation and control particulate emissions from the FBR Cooling System (TR31913) at all times the FBR Cooling System is in operation.

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

- (a) **Baghouse Parametric Monitoring**
The Permittee shall record the pressure drop across the baghouse, DC31917, at least once per week when the FBR Cooling System (TR31913) is in operation.
- (b) **Broken or Failed Bag Detection**
The Permittee shall maintain the baghouse and replace broken or failed bags as needed.
- (c) **Cyclone Failure Detection**
Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.

These monitoring conditions are necessary because the cyclone and baghouse for the FBR Cooling System must operate properly to ensure compliance with 326 IAC 6.5 (Particulate Matter Limitations Except Lake County) and in order to render 326 IAC 2-2 (PSD) not applicable.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T097-26765-00042. These corrections, changes, and removals may include Title I changes (e.g. changes that add or modify synthetic minor emission limits). Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

Note: The changes made as part of this modification are specific to the modification. The Part 70 Operating Permit Renewal application is due in July 2014. Any other changes to permit model language will be made in the next Part 70 Operating Permit Renewal.

The following is a summary of the changes made to this permit as part of this modification:

- (a) The Source Location Status and Source Status were updated in Section A.1 of the permit to reflect the current nonattainment status of the source.
- (b) The descriptive information was included in Sections A.2 and D.3 of the permit for the FBR Cooling System (TR31913).
- (c) PSD minor limits were included in Condition D.3.1 of the permit for the FBR Cooling System.
- (d) Unit TR31913 was included in Conditions D.3.2 - Particulate Matter [326 IAC 6.5-1-2], D.3.8 - Particulate Control, D.3.10 - Parametric Monitoring for Baghouses, and D.3.13 - Record Keeping Requirements.
- (e) A new Condition D.3.12 - Cyclone Failure Detection was added to provide instruction for when a cyclone failure has been observed.

The permit has been revised as follows:

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

The Permittee owns and operates a stationary wet corn milling plant which produces feed, gluten meal, germ meal, and heavy steepwater.

Source Address:	1515 South Drover Street, Indianapolis, Indiana 46221
General Source Phone Number:	(317) 635-4455
SIC Code:	2046
County Location:	Marion (Center Township)
Source Location Status:	Nonattainment for PM_{2.5} SO ₂ standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major 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 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

(tt) Starch operations, starch drying, starch handling and starch packaging consisting of the following units:

(85) One (1) FBR Cooling System, identified as TR31913, approved in 2014 for installation, with a product throughput of 15,000 pounds per hour, using a cyclone (CY31917)* and baghouse (DC31917)* for product recovery and particulate control, and exhausting to stack 9-158.

(856) ***

(867) ***

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(tt) Starch operations, starch drying, starch handling and starch packaging consisting of the following units:

(85) One (1) FBR Cooling System, identified as TR31913, approved in 2014 for installation, with a product throughput of 15,000 pounds per hour, using a cyclone (CY31917)* and baghouse (DC31917)* for product recovery and particulate control, and exhausting to stack 9-158.

(856) ***

(876) ***

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

D.3.1 PSD and Nonattainment NSR Minor Limits [326 IAC 2-2] [326 IAC 2-1.1-5]

- (a) * * *
- (b) * * *

(c) **In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the PM, PM10, and PM2.5 emissions from TR31913 shall be less than the emission limits listed in the table below:**

Unit Number	PM Emission Limit (lb/hr)	PM10 Emission Limit (lb/hr)	PM2.5 Emission Limit (lb/hr)
TR31913	1.71	1.71	1.71

Compliance with these limits, shall limit the emissions increase of the modification to less than twenty-five (25) tons of PM, fifteen (15) tons of PM10, and ten (10) tons of PM2.5 per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (PSD) not applicable to the modification.

D.3.2 Particulate Matter [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, the particulate matter emissions from units 40-1A, 40-1B, 42-6, 42-9, 42-11, 42-12, 42-13, 61-1, 61-2, 61-3, 61-7, 61-11, 61-12, 61-13, 61-15, 61-16, 61-18 through 61-20, 61-22, 61-23, 61-24 through 61-26, 63-1A, 63-4, 63-5, 63-6, 63-9, 63-12, 63-15, 63-16, 63-17, 63-18, 63-20, 71-3, 71-4A, 71-8, 128-3, 152-1 through 152-12, 577-1, 577-3, 577-4, 577-4A, 578-1, 578-2, 578-3, 5549-22, DC-31900, FA-60582, SH31913, TF31901, TF31902, TR31912, **TR31913**, TF31991, T-1, TF41818, TF41819 and TF41820 shall each not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

* * *

D.3.8 Particulate Control

In order to **ensure** compliance with Conditions D.3.1, D.3.2, and D.3.3, the **cyclones and baghouses** for particulate control, including those integral to the process, shall be in operation and control particulate emissions from all facilities listed in this section at all times those respective facilities are in operation.

* * *

D.3.10 Parametric Monitoring for Baghouses

(a) The Permittee shall record the pressure drop across the baghouses used in conjunction with units TF41818, TF41819, ~~and~~ TF41820, **and TR31913** at least once per week when units TF41818, TF41819, ~~and~~ TF41820, **and TR31913** are in operation. When, for any one reading, the pressure drop across ~~the~~ baghouses ~~is~~ are outside the normal range, **the Permittee shall take a reasonable response. The normal range for these units is a pressure drop between of 1.0 to and 8.0 inches of water, unless a different upper-bound or lower-bound value for this range is determined or a range established during the last/latest stack test, 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. 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.

- (b) * * *

D.3.11 Broken or Failed Bag Detection

* * *

D.3.12 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.3.123 Record Keeping Requirements

- (a) * * *
- (b) To document the compliance status with Condition D.3.10, the Permittee shall maintain a weekly record of the pressure drop across the baghouses used in conjunction with units TF41818, TF41819, ~~and TF41820~~, **and TR31913**. 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) * * *
- (d) * * *

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 097-34531-00042 and Significant Permit Modification No. 097-34603-00042. The staff recommend to the Commissioner that this Part 70 Minor Source Modification and Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Laura Spriggs Thompson 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) 233-5693 or toll free at 1-800-451-6027 extension 3-5693.
- (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>.

**TSD Appendix A: Emissions Calculations
FBR Cooling System (TR31913)**

Company Name: Ingredion Incorporated Indianapolis Plant
 Source Location: 1515 South Drover Street, Indianapolis, IN 46221
 MSM No.: 097-34531-00042
 SPM No.: 097-34603-00042

FBR Cooling System (TR31913)

Part 70 Permit Level Determination

Throughput Rate (lb/hr)	Cyclone CE	Baghouse CE	Potential to Emit PM/PM10/PM2.5 (ton/yr)
15000	90%	99.9%	6.57

Methodology

Potential to Emit PM/PM10/PM2.5 = Throughput Rate (lb/hr) x (1 - Cyclone CE) x (1 - Baghouse CE) x (8760 hr/yr) x (1 ton/2000 lb)

Note: The cyclone and baghouse have been determined to be integral to the process. Therefore, for purposes of Part 70 permit level determination, the potential to emit is based on emissions after the cyclone and baghouse.

TSD Appendix A: Emissions Calculations
PSD Analysis - Methodology

Company Name: Ingredion Incorporated Indianapolis Plant
 Source Location: 1515 South Drover Street, Indianapolis, IN 46221
 MSM No.: 097-34531-00042
 SPM No.: 097-34603-00042

Hybrid Test Analysis for PSD Applicability

- > Since the project affects existing and new units, the hybrid test in 326 IAC 2-2-2(d)(5) is being used to evaluate whether the project causes a significant emissions increase.
- > The baseline period for existing emission units was established based on the 2-year period between 2008 and 2012 with the highest emissions. Projected actual emission factors for existing emission units are assumed to be the same as the baseline period emission factors.
- > The Baseline Process Throughput and Controlled Emissions were provided by the permittee for the 24-Month Baseline Period.
- > The Controlled Emission Factor (lb/ton) = Controlled Emissions (tpy) x (2000 lb/ton)/ Process Throughput (tpy)
- > Projected actual starch production is conservatively assumed to be equal to the post-project maximum FBR starch production.
- > The increase in maximum FBR starch production (tpy) due to the project is calculated as the difference between the baseline period FBR starch production and projected actual starch production.
- > The projected actual throughput for each emission unit is calculated as either 1) the emission unit's baseline period throughput scaled by the ratio of projected actual starch production to the baseline period starch production, or 2) the emission unit's baseline period throughput plus the increase in maximum starch production.
- > Baseline emissions for new emission units are 0. Projected emissions for new units are equal to the PTE.

Post-Project Maximum FBR Starch Production 18,500 tpy

Pollutant	Baseline Period	Baseline Period FBR Starch Production (tpy)	Projected Starch Production (tpy)	Increase in FBR Starch Production (tpy)
PM	2010-11	12,299	18,500	6,201
PM10	2010-11	12,299	18,500	6,201
PM2.5	2010-11	12,299	18,500	6,201

TSD Appendix A: Emissions Calculations
PSD Analysis - PM

Company Name: Ingredion Incorporated Indianapolis Plant
 Source Location: 1515 South Drover Street, Indianapolis, IN 46221
 MSM No.: 097-34531-00042
 SPM No.: 097-34603-00042

Emissions Increase - PM

EUID	Description	Baseline Actual Emissions			Controlled Emission Factor (lb/ton)	Projected Actual Emissions		
		24-Month Baseline Period	Process Throughput (tpy)	Baseline Actual Emissions (tpy)		Process Throughput (tpy)	Projected Actual Emissions (tpy)	Emissions Increase (tpy)
Existing Units								
575-1	#4 Starch Flash Dryer	2010-11	73,701	10.67	0.29			
575-2	#5 Starch Flash Dryer	2010-11	65,163	9.40	0.29			
575-3	#6 Starch Flash Dryer	2010-11	67,203	9.74	0.29			
575-1 to 575-3	#4 - #6 Starch Flash Dryers*	2010-11	206,067	29.81	0.29	218,469	31.60	1.79
577-5 to 10	RSP Hopper #1 - #6*	2010-11	36,850	0.08	4.26E-03	43,051	0.09	0.01
577-4	RSP Bulk Loading System A*	2010-11	74,832	0.04	9.90E-04	81,032	0.04	3.07E-03
577-4A	RSP Bulk Loading Fugitive Dust Collector*	2010-11	74,832	0.02	4.90E-04	81,032	0.02	1.52E-03
42-12	DSE Railcar Loading - West Track	2010-11	9,263	0.01	1.20E-03	13,933	0.01	2.81E-03
577-2	RSP North Packing Line*	2010-11	95,838	3.44	0.07	102,038	3.66	0.22
SH31913	Surge Tank Bin 158-3	2010-11	12,299	0.04	0.01	18,500	0.05	0.02
TR31912	FBR Exhaust	2010-11	12,299	3.13	0.51	18,500	4.70	1.58
DC-31900	Bulk Bag Unload Bin 158-4	2010-11	3,036	0.03	0.02	4,567	0.04	0.01
TF31902	Base Bin 158-1	2010-11	9,263	0.03	0.01	13,933	0.04	0.01
TF31901	Base Blending Bin 158-5	2010-11	3,036	0.09	0.06	4,567	0.13	0.04
New Units								
TR31913	FBR Cooling System**			0.00			7.49	7.49

*These operations include product going to or from the FBR process, but also includes product going to or from other processes at the plant. Therefore, the projected throughputs for these systems were not scaled up based on the ratio of FBR product increase. They were determined based on the total increase in FBR starch production. For the other operations only associated with the FBR process, the projected throughput was determined based on the ratio of projected FBR production to baseline FBR production.

Total PM Emission Increase (tpy): 11.19
 Significant Emission Rate: 25
 Exceeds Significant Emission Rate: **NO**

**In order to render 326 IAC 2-2 (PSD) not applicable, PM emissions from the FBR Cooling System shall not exceed 1.71 lb/hr.

TSD Appendix A: Emissions Calculations
PSD Analysis - PM10

Company Name: Ingredion Incorporated Indianapolis Plant
 Source Location: 1515 South Drover Street, Indianapolis, IN 46221
 MSM No.: 097-34531-00042
 SPM No.: 097-34603-00042

Emissions Increase - PM10

EUID	Description	Baseline Actual Emissions			Controlled Emission Factor (lb/ton)	Projected Actual Emissions		
		24-Month Baseline Period	Process Throughput (tpy)	Baseline Actual Emissions (tpy)		Process Throughput (tpy)	Projected Actual Emissions (tpy)	Emissions Increase (tpy)
Existing Units								
575-1	#4 Starch Flash Dryer	2010-11	73,701	9.18	0.25			
575-2	#5 Starch Flash Dryer	2010-11	65,163	7.90	0.24			
575-3	#6 Starch Flash Dryer	2010-11	67,203	8.36	0.25			
575-1 to 3	#4 - #6 Starch Flash Dryers*	2010-11	206,067	25.45	0.25	218,469	26.98	1.53
577-5 to 10	RSP Hopper #1 - #6*	2010-11	36,850	0.03	1.40E-03	43,051	0.03	4.34E-03
577-4	RSP Bulk Loading System A*	2010-11	74,832	0.02	4.90E-04	81,032	0.02	1.52E-03
577-4A	RSP Bulk Loading Fugitive Dust Collector*	2010-11	74,832	0.01	2.04E-04	81,032	0.01	6.33E-04
42-12	DSE Railcar Loading - West Track	2010-11	9,263	2.27E-03	4.90E-04	13,933	3.41E-03	1.14E-03
577-2	RSP North Packing Line*	2010-11	95,838	3.13	0.07	102,038	3.33	0.20
SH31913	Surge Tank Bin 158-3	2010-11	12,299	0.03	0.01	18,500	0.05	0.02
TR31912	FBR Exhaust	2010-11	12,299	2.94	0.48	18,500	4.42	1.48
DC-31900	Bulk Bag Unload Bin 158-4	2010-11	3,036	0.02	0.02	4,567	0.03	0.01
TF31902	Base Bin 158-1	2010-11	9,263	0.03	0.01	13,933	0.04	0.01
TF31901	Base Blending Bin 158-5	2010-11	3,036	0.07	0.05	4,567	0.11	0.04
New Units								
TR31913	FBR Cooling System**			0.00E+00			7.49	7.49

*These operations include product going to or from the FBR process, but also includes product going to or from other processes at the plant. Therefore, the projected throughputs for these systems were not scaled up based on the ratio of FBR product increase. They were determined based on the total increase in FBR starch production. For the other operations only associated with the FBR process, the projected throughput was determined based on the ratio of projected FBR production to baseline FBR production.

Total PM10 Emission Increase (tpy): 10.79
 Significant Emission Rate: 15
 Exceeds Significant Emission Rate: **NO**

**In order to render 326 IAC 2-2 (PSD) not applicable, PM10 emissions from the FBR Cooling System shall not exceed 1.71 lb/hr.

TSD Appendix A: Emissions Calculations
PSD Analysis - PM2.5

Company Name: Ingredion Incorporated Indianapolis Plant
 Source Location: 1515 South Drover Street, Indianapolis, IN 46221
 MSM No.: 097-34531-00042
 SPM No.: 097-34603-00042

Emissions Increase - PM2.5

EUID	Description	Baseline Actual Emissions			Controlled Emission Factor (lb/ton)	Projected Actual Emissions		
		24-Month Baseline Period	Process Throughput (tpy)	Baseline Actual Emissions (tpy)		Process Throughput (tpy)	Projected Actual Emissions (tpy)	Emissions Increase (tpy)
Existing Units								
575-1	#4 Starch Flash Dryer	2010-11	73,701	1.49	0.04			
575-2	#5 Starch Flash Dryer	2010-11	65,163	1.49	0.05			
575-3	#6 Starch Flash Dryer	2010-11	67,203	1.38	0.04			
575-1 to 3	#4 - #6 Starch Flash Dryers*	2010-11	206,067	4.36	0.04	218,469	4.62	0.26
577-5 to 10	RSP Hopper #1 - #6*	2010-11	36,850	0.05	2.86E-03	43,051	0.06	0.01
577-4	RSP Bulk Loading System A*	2010-11	74,832	0.02	5.00E-04	81,032	0.02	1.55E-03
577-4A	RSP Bulk Loading Fugitive Dust Collector*	2010-11	74,832	0.01	2.86E-04	81,032	0.01	8.86E-04
42-12	DSE Railcar Loading - West Track	2010-11	9,263	3.31E-03	7.14E-04	13,933	4.98E-03	1.67E-03
577-2	RSP North Packing Line*	2010-11	95,838	0.31	0.01	102,038	0.33	0.02
SH31913	Surge Tank Bin 158-3	2010-11	12,299	9.81E-04	1.60E-04	18,500	1.48E-03	4.95E-04
TR31912	FBR Exhaust	2010-11	12,299	0.19	0.03	18,500	0.28	0.09
DC-31900	Bulk Bag Unload Bin 158-4	2010-11	3,036	3.14E-03	2.07E-03	4,567	4.72E-03	1.58E-03
TF31902	Base Bin 158-1	2010-11	9,263	9.32E-04	2.01E-04	13,933	1.40E-03	4.70E-04
TF31901	Base Blending Bin 158-5	2010-11	3,036	0.01	0.01	4,567	0.02	0.01
New Units								
TR31913	FBR Cooling System			0.00E+00			7.49	7.49

*These operations include product going to or from the FBR process, but also includes product going to or from other processes at the plant. Therefore, the projected throughputs for these systems were not scaled up based on the ratio of FBR product increase. They were determined based on the total increase in FBR starch production. For the other operations only associated with the FBR process, the projected throughput was determined based on the ratio of projected FBR production to baseline FBR production.

Total PM2.5 Emission Increase (tpy): 7.89
 Significant Emission Rate: 10
 Exceeds Significant Emission Rate: **NO**

**In order to render 326 IAC 2-2 (PSD) not applicable, PM2.5 emissions from the FBR Cooling System shall not exceed 1.71 lb/hr.

TSD Appendix B: Economic Evaluation of the Baghouse Recovery System

Company Name: Ingredion Incorporated Indianapolis Plant
 Source Location: 1515 South Drover Street, Indianapolis, IN 46221
 MSM No.: 097-34531-00042
 SPM No.: 097-34603-00042

Product Estimates

Product Rate (lb/hr)	Projected Operating Hours (hr/yr)	Projected Product Throughput (ton/yr)	Cyclone CE	Product Recovered by Cyclone (ton/yr)	Product Routed to Baghouse (ton/yr)	Baghouse CE	Product Recovered by Baghouse (ton/yr)
15000	2467	18500	90%	16650	1850	99.00%	1831.5

Methodology

Product Recovered by Cyclone (ton/yr) = Projected Product Throughput (ton/yr) x Cyclone CE
 Product Routed to Baghouse (ton/yr) = Projected Product Throughput (ton/yr) x (1 - Cyclone CE)
 Product Recovered by Baghouse (ton/yr) = Product Routed to Baghouse (ton/yr) x Baghouse CE

Economic Cost Analysis of Installing a Baghouse After the Cyclone on the FBR Cooling System

Total Capital Investment (Purchased Equipment Cost, Direct and Indirect Installation Costs)	\$ 239,000.00		As estimated by the Permittee
Baghouse Operating Cost	\$ 0.27	\$/hr	Estimated.
Bag Replacement Cost	\$ 10,400.00	\$/yr	Cost of replacing 260 bags at \$40/bag. Not all bags will require replacing every year, so value is conservatively high. Assume cost of labor included.
Annual Operating Cost	\$ 12,765.20	\$/yr	= Baghouse Operating Cost (\$/hr) x (8760 hr/yr) + Bag Replacement Cost
Indirect Annual Costs			
Overhead	\$ 7,659.12	\$/yr	EPA Air Pollution Control Cost Manual (6th Ed), Sec 6, Ch. 1.5.2: 60% of Annual Operating Cost
Administrative Charges	\$ 4,780.00	\$/yr	EPA Air Pollution Control Cost Manual (6th Ed), Sec 6, Ch. 1.5.2: 2% of Total Capital Investment
Property Tax	\$ 2,390.00	\$/yr	EPA Air Pollution Control Cost Manual (6th Ed), Sec 6, Ch. 1.5.2: 1% of Total Capital Investment
Insurance	\$ 2,390.00	\$/yr	EPA Air Pollution Control Cost Manual (6th Ed), Sec 6, Ch. 1.5.2: 1% of Total Capital Investment
Capital Recovery Cost Factor (CRF)	0.09439		EPA Air Pollution Control Cost Manual (6th Ed), Sec 6, Ch. 1.5.2: Assumes 7% interest rate and 20-year equipment life.
Capital Recovery	\$ 22,559.21	\$/yr	EPA Air Pollution Control Cost Manual (6th Ed), Sec 6, Ch. 1.5.2: Total Capital Investment x CRF
Total Indirect Annual Costs	\$ 39,778.33	\$/yr	
Total Annual Cost for Baghouse	\$ 52,543.53	\$/yr	= Annual Operating Cost + Total Indirect Annual Costs
Total Product to Baghouse	1850	ton/yr	= 15,000 lb/hr x 2467 hr/yr x (1 - Cyclone CE (90%)) x (1 ton/2000 lb)
Recovery Efficiency	99.00%		Conservative estimate
Product Recovered by Baghouse	1831.5	ton/yr	
Cost/ton Recovered to Run Baghouse	\$ 28.69	\$/ton	= Total Annual Cost / Product Recovered by Baghouse
Product Cost per Pound	\$ 0.54	\$/lb	Cost of product processed in FBR
Product Cost per Ton	\$ 1,080.00	\$/ton	
Baghouse Product Recovery Value	\$ 1,978,020.00	\$/yr	= Cost per Ton x Product Recovered (ton/yr)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Melissa Putnam
Ingredion Incorporated Indianapolis Plant
1515 S Drover Street
Indianapolis, IN 46221

DATE: June 17, 2014

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

SUBJECT: Final Decision
Title V - Minor Source Modification
097 - 34531 - 00042

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:
Chad Davis, Plant Manager
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.

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

IDEM Staff	LPOGOST 6/17/2014 Ingredion Incorporated Indols Plant 097-34603-00042 draft 097 - 34531 - 00042 final		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Melissa Putman Ingredion Incorporated Indianapolis Plant 1515 S Drover St Indianapolis IN 46221 (Source CAATS) Via confirmed delivery									
2		Chad Davis Plant Mgr Ingredion Incorporated Indianapolis Plant 1515 S Drover St Indianapolis IN 46221 (RO CAATS)									
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)									
4		West Indianapolis Library Branch 1216 South Kappes St. Indianapolis IN 46221 (Library)									
5		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)									
6		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)									
7		Mr. David Dempsey Trinity Consultants 7330 Woodland Drive, Suite 225 Indianapolis IN 46278 (Consultant)									
8		Matt Mosier Office of Sustainability City-County Bldg/200 E Washington St. Rm# 2460 Indianapolis IN 46204 (Local Official)									
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