



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

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NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a
Federally Enforceable State Operating Permit (FESOP)

for Helena Chemical Company - Huntington Terminal in Huntington County

Significant Permit Revision No.: 069-35336-00084

The Indiana Department of Environmental Management (IDEM) has received an application from Helena Chemical Company - Huntington Terminal, located at 321 Thurman Poe Way, Huntington, IN 46750, for a significant revision of its FESOP issued on August 3, 2010. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Helena Chemical Company - Huntington Terminal to make certain changes at its existing source. Helena Chemical Company - Huntington Terminal has applied to include the following unpermitted emission units in the operating permit:

Two (2) micro nutrient storage bins, identified as DF-12, constructed in 2011, uncontrolled, receiving material from bucket elevator DF-10.

The applicant intends to operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g. changes that add or modify synthetic minor emission limits) The potential to emit of any regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

IDEM is aware that the micro nutrient storage bins, identified as DF-12, have been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft FESOP contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

A copy of the permit application and IDEM's preliminary findings are available at:

Huntington Public Library
200 West Market Street
Huntington, IN 46750

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will

make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR069-35336-00084 in all correspondence.

Comments should be sent to:

Julie Mendez
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-1243
Or dial directly: (317) 234-1243
Fax: (317)-232-6749 attn: Julie Mendez
E-mail: JMendez@idem.IN.gov

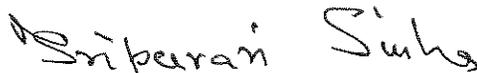
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: www.idem.in.gov.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Julie Mendez or my staff at the above address.


Tripurari P. Sinha, Ph.D., Section Chief
Permits Branch
Office of Air Quality



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Terry Drottz
Helena Chemical Company - Huntington Terminal
321 Thurman Poe Way
Huntington, IN 46750

Re: 069-35336-00084
Significant Revision to
F069-29024-00084

Dear Terry Drottz:

Helena Chemical Company - Huntington Terminal was issued a Federally Enforceable State Operating Permit (FESOP) No. F069-29024-00084 on August 3, 2010 for a stationary dry and liquid fertilizer mixing, storage and distribution operation located at 321 Thurman Poe Way, Huntington, IN 46750. On October 27, 2014, the Office of Air Quality (OAQ) received a renewal application from the source, which included an unpermitted emission unit. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised. The permit references the below listed attachment. Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this revision:

Attachment A: Fugitive Dust Control Plan

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

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 Julie Mendez of my staff at 317-234-1243 or 1-800-451-6027, and ask for extension 4-1243.

Sincerely,

Tripurari P. Sinha, Ph. D., Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

TS/jm

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



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

**Helena Chemical Company - Huntington Terminal
321 Thurman Poe Way
Huntington, Indiana 46750**

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

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

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

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

Operation Permit No.: F069-29024-00084	
Original signed by: Alfred C. Dumaul, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: August 3, 2010 Expiration Date: August 3, 2015

First Administrative Amendment No.: 069-31771-00084, issued on May 30, 2012
First Significant Permit Revision No. 069-32253-00084, issued on November 29, 2012
Second Administrative Amendment No.: 069-32909-00084, issued on April 2, 2013
Third Administrative Amendment No.: 069-33811-00084, issued on December 10, 2013

Second Significant Permit Revision No. 069-35336-00084	
Issued by: Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: August 3, 2015

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Attachment A - Fugitive Dust Control Plan

SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary dry and liquid fertilizer mixing, storage and distribution operation.

Source Address:	321 Thurman Poe Way, Huntington, Indiana 46750
General Source Phone Number:	(317) 815-6370
SIC Code:	2874 (Phosphatic Fertilizers), 2875 (Fertilizers, Mixing Only)
County Location:	Huntington
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

Dry Formulation Process

One (1) Dry Formulation process, identified as DF, consisting of the following emission units:

- (a) Rail Unloading, identified as DF-1A, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stack EP-7.
- (b) Truck Unloading, identified as DF-1B, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stack EP-8.

Note: The Rail and Truck Unloading cannot operate simultaneously.

- (c) One (1) enclosed conveyor, identified as DF-2, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-7 and EP-8.
- (d) One (1) enclosed bucket elevator, identified as DF-3, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
- (e) One (1) elevator dump to pile - aggregate material, identified as DF-4, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
- (f) One (1) front-end loader dump, identified as DF-5 constructed in 2011, with a maximum capacity of 700 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.
- (g) One (1) floor inlet/hopper for wholesale product bins, identified as DF-6, constructed in

- 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.
- (h) One (1) enclosed wholesale conveyor, identified as DF-8, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.
 - (i) One (1) enclosed wholesale bucket elevator, identified as DF-10, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.
 - (j) One (1) enclosed wholesale bucket elevator dump, identified as DF-11, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.
 - (k) One (1) enclosed retail bucket elevator dump to bin, identified as DF-13, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.
 - (l) One (1) Product 4 truck unloading operation, identified as DF-14, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled, and exhausting to stacks EP-1A and EP-2A.
 - (m) One (1) enclosed Product 4 conveyor and bin loading operation, identified as DF-15 and DF-16, respectively, constructed in 2011, with a maximum capacity of 30 tons per hour, with uncontrolled, and exhausting to stacks EP-1 and EP-2.
 - (n) One (1) Product 4 skid loader, identified as DF-17, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.
 - (o) One (1) Product 4 skid loader dump, identified as DF-18, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
 - (p) One (1) enclosed Product 4 bucket elevator, identified as DF-19, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
 - (q) One (1) enclosed bucket elevator dump, identified as DF-20, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
 - (r) One (1) enclosed wholesale bin dump, identified as DF-21, approved for construction in 2010 constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
 - (s) One (1) enclosed retail bin dump, identified as DF-22, constructed in 2011, with a maximum capacity of 120 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
 - (t) One (1) enclosed Product 4 retail bin dump, identified as DF-23, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.

- (u) One (1) enclosed retail product blender, identified as DF-24, constructed in 2011, with a maximum capacity of 120 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
- (v) One (1) bin dump - wholesale loadout, identified as DF-25, constructed in 2011, with a maximum capacity of 200 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
- (w) One (1) bin dump - retail loadout, identified as DF-26A, constructed in 2011, with a maximum capacity of 120 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
- (x) One (1) Product 4 - retail loadout, identified as DF-26B, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
- (y) Storage piles, identified as DF-27, constructed in 2011, with a maximum capacity of 50,000 tons per year, uncontrolled and exhausting to stacks EP-1 and EP-2.
- (z) Two (2) micro nutrient storage bins, identified as DF-12, constructed in 2011, uncontrolled, receiving material from bucket elevator DF-10.

Liquid Formulation Process

One (1) Liquid Formulation Process, identified as FB, with a limited maximum throughput of 15 tons per hour of dry ingredients, consisting of the following emission units:

- (a) One (1) Product 1 Hopper, identified as FB-1, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled and exhausting to stack EP-4.
- (b) One (1) Product 1 pneumatic conveyor into bin, identified as FB-2, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled and exhausting to stack EP-4.
- (c) One (1) enclosed Product 1 auger to blender, identified as FB-3, constructed in 2011, with a maximum capacity of 75 tons per hour, uncontrolled, and exhausting to stack EP-4.
- (d) One (1) Product 1 belly dump conveyer - hopper, identified as FB-4, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-3.
- (e) One (1) Product 1 pneumatic conveyor into bin, identified as FB-5, approved for construction in 2010 constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-3.
- (f) One (1) enclosed Product 1 auger into blender, identified as FB-6, constructed in 2011, with a maximum capacity of 75 tons per hour, uncontrolled, and exhausting to stack EP-3.
- (g) One (1) Product 1 dump super sack contents, identified as FB-7, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (h) One (1) enclosed Product 1 bucket elevator conveyance of super sack contents, identified as FB-8, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

- (i) One (1) Product 1 bucket elevator dump, identified as FB-9, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (j) One (1) Product 1 blender, identified as FB-10, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (k) One (1) enclosed Product 2 auger to blender, identified as FB-11, constructed in 2011, with a maximum capacity of 75 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (l) One (1) Product 2 dump super sack contents, identified as FB-12, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (m) One (1) enclosed Product 2 elevator conveyance of super sack contents, identified as FB-13, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (n) One (1) Product 2 bucket elevator dump, identified as FB-14, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (o) One (1) Product 2 blender, identified as FB-15, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (p) One (1) enclosed Product 3 auger into blender, identified as FB-16, constructed in 2011, with a maximum capacity of 75 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (q) One (1) Product 3 blender, identified as FB-17, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (r) One (1) Product 4L dump super sack of contents, identified as FB-18, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (s) One (1) enclosed Product 4L bucket elevator conveyance of super sack contents, identified as FB-19, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (t) One (1) Product 4L bucket elevator dump, identified as FB-20, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (u) One (1) enclosed Product 4L blender, identified as FB-21, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (v) One (1) polyphosphate blender, identified as FB-22, constructed in 2011, with a maximum capacity of 50 tons per hour, uncontrolled, and exhausting to stack EP-6.

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

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million Btu per hour:

- (1) Two (2) natural gas-fired boilers, identified as EU-1 and EU-2, constructed in 2010, with a heat input rate of 6 MMBtu per hour and 1 MMBtu per hour, respectively, uncontrolled, and exhausting to stacks EP-9 and EP-10, respectively.
 - (2) One (1) natural gas-fired space heater, identified as LF#1, constructed in 2013, with a maximum heat input capacity of 0.400 MMBtu/hr, using no controls, and exhausting to stack L#2.
 - (3) One (1) natural gas-fired evaporator, identified as LE#1, approved for construction in 2013, with a maximum heat input capacity of 0.327 MMBtu/hr, using no controls, and exhausting to stack LE#1.
- (b) Repair activities, including the following:
- (1) Heat exchanger cleaning and repair
 - (2) Process vessel degassing and cleaning to prepare for internal repairs.
- (c) Unpaved Roads
- (d) Storage tanks that do not store VOCs or HAPs, including the following:

Tank ID	Installation Date	Tank Type	Maximum Storage Capacity (gallons)	Control Technique(s)
T-1	2010	Fixed Roof, Dome	30,000	Vapor Recovery System
T-2	2010	Fixed Roof, Dome	30,000	None
T-3	2010	Fixed Roof, Dome	30,000	None
T-4	2010	Fixed Roof, Dome	30,000	None
T-5	2010	Fixed Roof, Dome	30,000	None
T-6	2010	Fixed Roof, Dome	30,000	None
T-7A	2010	Pressure Tank	30,000	Vapor Recovery System
T-7B	2010	Pressure Tank	30,000	Vapor Recovery System
T-8	2010	Fixed Roof, Dome	21,000	None
T-9	2010	Fixed Roof, Dome	21,000	None
T-10	2010	Fixed Roof, Dome	21,000	None
T-11	2010	Fixed Roof, Dome	30,000	None
T-12	2010	Fixed Roof, Dome	30,000	None
T-13	2010	Fixed Roof, Dome	30,000	None
T-14	2010	Fixed Roof, Dome	30,000	None
T-15	2010	Fixed Roof, Dome	30,000	None
T-16	2010	Fixed Roof, Dome	30,000	None
T-17	2010	Fixed Roof, Dome	30,000	None
T-18	2010	Fixed Roof, Dome	30,000	None
T-19	2010	Fixed Roof, Dome	30,000	None
T-20	2010	Fixed Roof, Cone	500,000	None
T-21	2010	Fixed Roof, Cone	500,000	None
T-22	2010	Fixed Roof, Cone	1,000,000	None
T-23	2010	Fixed Roof, Cone	1,000,000	None
T-24	2010	Fixed Roof, Cone	1,000,000	None
T-25	2010	Fixed Roof, Cone	1,000,000	None
T-26	2010	Fixed Roof, Cone	300,000	None
T-27	2010	Fixed Roof, Cone	21,000	None
MB Group 1	2010	46 Mini-bulk tanks	275, each	None
MB Group 2	2010	1,000 Mini-bulk tanks	275, each	None

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

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

- (a) This permit, F069-29024-00084, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (i) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
 - (ii) the certification is based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

- (a) All terms and conditions of permits established prior to F069-29024-00084 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

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

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

- (b) Emission Trades [326 IAC 2-8-15 (b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15 (b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15 (c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.26 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per twelve (12) consecutive month period.

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

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

C.8 Stack Height [326 IAC 1-7]

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

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

C.10 Performance Testing [326 IAC 3-6]

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.12 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

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

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

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

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

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

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

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

(1) initial inspection and evaluation;

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

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
 - (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the FESOP.Records of required monitoring information include the following, where applicable:
 - (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.

- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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

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

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.20 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:

Dry Formulation Process

One (1) Dry Formulation process, identified as DF, consisting of the following emission units:

- (a) Rail Unloading, identified as DF-1A, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stack EP-7.
- (b) Truck Unloading, identified as DF-1B, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stack EP-8.
- (c) One (1) enclosed conveyor, identified as DF-2, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-7 and EP-8.
- (d) One (1) enclosed bucket elevator, identified as DF-3, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
- (e) One (1) elevator dump to pile - aggregate material, identified as DF-4, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
- (f) One (1) front-end loader dump, identified as DF-5 constructed in 2011, with a maximum capacity of 700 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.
- (g) One (1) floor inlet/hopper for wholesale product bins, identified as DF-6, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.
- (h) One (1) enclosed wholesale conveyor, identified as DF-8, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.
- (i) One (1) enclosed wholesale bucket elevator, identified as DF-10, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.
- (j) One (1) enclosed wholesale bucket elevator dump, identified as DF-11, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.
- (k) One (1) enclosed retail bucket elevator dump to bin, identified as DF-13, constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.
- (l) One (1) Product 4 truck unloading operation, identified as DF-14, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled, and exhausting to stacks EP-1A and EP-2A.
- (m) One (1) enclosed Product 4 conveyor and bin loading operation, identified as DF-15 and DF-16, respectively, constructed in 2011, with a maximum capacity of 30 tons per hour, with uncontrolled, and exhausting to stacks EP-1 and EP-2.

- (n) One (1) Product 4 skid loader, identified as DF-17, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled, and exhausting to stacks EP-1 and EP-2.
 - (o) One (1) Product 4 skid loader dump, identified as DF-18, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
 - (p) One (1) enclosed Product 4 bucket elevator, identified as DF-19, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
 - (q) One (1) enclosed bucket elevator dump, identified as DF-20, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
 - (r) One (1) enclosed wholesale bin dump, identified as DF-21, approved for construction in 2010 constructed in 2011, with a maximum capacity of 300 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
 - (s) One (1) enclosed retail bin dump, identified as DF-22, constructed in 2011, with a maximum capacity of 120 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
 - (t) One (1) enclosed Product 4 retail bin dump, identified as DF-23, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
 - (u) One (1) enclosed retail product blender, identified as DF-24, constructed in 2011, with a maximum capacity of 120 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
 - (v) One (1) bin dump - wholesale loadout, identified as DF-25, constructed in 2011, with a maximum capacity of 200 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
 - (w) One (1) bin dump - retail loadout, identified as DF-26A, constructed in 2011, with a maximum capacity of 120 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
 - (x) One (1) Product 4 - retail loadout, identified as DF-26B, constructed in 2011, with a maximum capacity of 30 tons per hour, uncontrolled and exhausting to stacks EP-1 and EP-2.
 - (y) Storage piles, identified as DF-27, constructed in 2011, with a maximum capacity of 50,000 tons per year, uncontrolled and exhausting to stacks EP-1 and EP-2.
 - (z) Two (2) micro nutrient storage bins, identified as DF-12, constructed in 2011, uncontrolled, receiving material from bucket elevator DF-10.
- (The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

D.1.1 PSD Minor Limit [326 IAC 2-2] [326 IAC 2-8]

(a) The PM emissions from the Dry Formulation process shall be less than the following:

Emission Unit	Unit ID	PM Limit (lb/ton)
Rail Unloading	DF-1A	0.0069
Truck Unloading	DF-1B	0.0069
Conveyor	DF-2	0.0069
Bucket Elevator	DF-3	0.0069
Elevator Dump to Pile - Aggregate Material	DF-4	0.0069
Front End Loader Dump	DF-5	0.0069

Floor Inlet with Conditioner - Wholesale	DF-6	0.0069
Wholesale Conveyor	DF-8	0.0069
Wholesale Bucket Elevator	DF-10	0.0069
Wholesale Bucket Elevator Dump	DF-11	0.0069
Retail Bucket Elevator Dump to Bin	DF-13	0.0069
Truck Unloading - Product 4	DF-14	0.544
Conveyor - Product 4	DF-15	0.544
Bin Loading - Product 4	DF-16	0.544
Skid Loader - Product 4	DF-17	0.544
Skid Loader Dump - Product 4	DF-18	0.544
Bucket Elevator - Product 4	DF-19	0.544
Bucket Elevator Dump	DF-20	0.0069
Bin Dump - Wholesale	DF-21	0.0069
Bin Dump - Retail	DF-22	0.0069
Bin Dump - Retail	DF-23	0.544
Blender - Retail	DF-24	0.544
Bin Dump - Wholesale	DF-25	0.0069
Bin Dump - Retail Loadout	DF-26A	0.0069
Bin Dump Retail Loadout - Product 4	DF-26B	0.995
Micro Nutrient Storage Bins	DF-12	0.02

(b) The PM10/PM2.5 emissions from the Dry Formulation process shall be less than the following:

Emission Unit	Unit ID	PM10/PM2.5 Limit (lb/ton)
Rail Unloading	DF-1A	0.0033
Truck Unloading	DF-1B	0.0033
Conveyor	DF-2	0.0033
Bucket Elevator	DF-3	0.0033
Elevator Dump to Pile - Aggregate Material	DF-4	0.0033
Front End Loader Dump	DF-5	0.0033
Floor Inlet with Conditioner - Wholesale	DF-6	0.0033
Wholesale Conveyor	DF-8	0.0033
Wholesale Bucket Elevator	DF-10	0.0033
Wholesale Bucket Elevator Dump	DF-11	0.0033
Retail Bucket Elevator Dump to Bin	DF-13	0.0033
Truck Unloading - Product 4	DF-14	0.134
Conveyor - Product 4	DF-15	0.134
Bin Loading - Product 4	DF-16	0.134
Skid Loader - Product 4	DF-17	0.134
Skid Loader Dump - Product 4	DF-18	0.134
Bucket Elevator - Product 4	DF-19	0.134
Bucket Elevator Dump	DF-20	0.0033
Bin Dump - Wholesale	DF-21	0.0033
Bin Dump - Retail	DF-22	0.0033
Bin Dump - Retail	DF-23	0.134
Blender - Retail	DF-24	0.134
Bin Dump - Wholesale	DF-25	0.0033
Bin Dump - Retail Loadout	DF-26A	0.0033
Bin Dump Retail Loadout - Product 4	DF-26B	0.278
Micro Nutrient Storage Bins	DF-12	0.02

- (c) The dry ingredient input to the Dry Formulation process shall be less than 51,500 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

D.1.2 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) emissions from the units in the following table shall not exceed the following limits:

Emission Unit	Unit ID	Maximum Process Weight Rate (tons/hr)	6-3-2 PM Limit (lbs/hr)
Rail Unloading	DF-1A	300	63.00
Truck Unloading	DF-1B	300	63.00
Conveyor	DF-2	300	63.00
Bucket Elevator	DF-3	300	63.00
Elevator Dump to Pile - Aggregate Material	DF-4	300	63.00
Front-End Loader Dump	DF-5	700	73.06
Floor Inlet with Conditioner - Wholesale	DF-6	300	63.00
Wholesale Conveyor	DF-8	300	63.00
Wholesale Bucket Elevator	DF-10	300	63.00
Wholesale Bucket Elevator Dump	DF-11	300	63.00
Retail Bucket Elevator Dump to Bin	DF-13	300	63.00
Truck Unloading - Product 4	DF-14	30	40.04
Conveyor - Product 4	DF-15	30	40.04
Bin Loading - Product 4	DF-16	30	40.04
Skid Loader - Product 4	DF-17	30	40.04
Skid Loader Dump - Product 4	DF-18	30	40.04
Bucket Elevator Dump	DF-19	30	40.04
Bucket Elevator Dump	DF-20	30	40.04
Bin Dump - Wholesale	DF-21	200	58.51
Bin Dump - Retail	DF-22	120	53.13
Bin Dump - Retail Product 4	DF-23	30	40.04
Blender - Retail	DF-24	120	53.13
Bin Dump - Wholesale Loadout	DF-25	200	58.51
Bin Dump - Retail Loadout	DF-26A	120	53.13
Bin Dump - Retail Loadout - Product 4	DF-26B	30	40.04
Storage Piles	DF-27	5.71	26.62
Micro Nutrient Storage Bins	DF-12	300	63.00

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

$$E = 4.10 P^{0.67}$$

and interpolation and extrapolation of the data for process weight rates in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

Where: E = Rate of Emission in pounds per hour
P = Process weight rate in tons per hour

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

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

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

D.1.4 Visible Emission Notations

- (a) Daily visible emission notations of the Dry Formulation Process stack exhaust (Stacks EP-1 and EP-2) shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to response steps. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.5 Record Keeping Requirement

- (a) In order to demonstrate the compliance status with Condition D.1.1(c), the Permittee shall maintain records of the dry ingredient input to the Dry Formulation Process for each month and for each compliance period.
- (b) In order to demonstrate the compliance status with Condition D.1.4, the Permittee shall maintain daily records of the visible emission notations of the Dry Formulation Process stack exhaust (EP-1 and EP-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) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.6 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1(c) shall be submitted using the reporting form located at the end of this permit, or its 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 report submitted by the Permittee does require a certification that meets the

requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Liquid Formulation Process

One (1) Liquid Formulation Process, identified as FB, with a limited maximum throughput of 15 tons per hour of dry ingredients, consisting of the following emission units:

- (a) One (1) Product 1 Hopper, identified as FB-1, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled and exhausting to stack EP-4.
- (b) One (1) Product 1 pneumatic conveyor into bin, identified as FB-2, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled and exhausting to stack EP-4.
- (c) One (1) enclosed Product 1 auger to blender, identified as FB-3, constructed in 2011, with a maximum capacity of 75 tons per hour, uncontrolled, and exhausting to stack EP-4.
- (d) One (1) Product 1 belly dump conveyer - hopper, identified as FB-4, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-3.
- (e) One (1) Product 1 pneumatic conveyor into bin, identified as FB-5, approved for construction in 2010 constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-3.
- (f) One (1) enclosed Product 1 auger into blender, identified as FB-6, constructed in 2011, with a maximum capacity of 75 tons per hour, uncontrolled, and exhausting to stack EP-3.
- (g) One (1) Product 1 dump super sack contents, identified as FB-7, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (h) One (1) enclosed Product 1 bucket elevator conveyance of super sack contents, identified as FB-8, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (i) One (1) Product 1 bucket elevator dump, identified as FB-9, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (j) One (1) Product 1 blender, identified as FB-10, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (k) One (1) enclosed Product 2 auger to blender, identified as FB-11, constructed in 2011, with a maximum capacity of 75 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (l) One (1) Product 2 dump super sack contents, identified as FB-12, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (m) One (1) enclosed Product 2 elevator conveyance of super sack contents, identified as FB-13, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
- (n) One (1) Product 2 bucket elevator dump, identified as FB-14, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.

- (o) One (1) Product 2 blender, identified as FB-15, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
 - (p) One (1) enclosed Product 3 auger into blender, identified as FB-16, constructed in 2011, with a maximum capacity of 75 tons per hour, uncontrolled, and exhausting to stack EP-5.
 - (q) One (1) Product 3 blender, identified as FB-17, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
 - (r) One (1) Product 4L dump super sack of contents, identified as FB-18, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
 - (s) One (1) enclosed Product 4L bucket elevator conveyance of super sack contents, identified as FB-19, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
 - (t) One (1) Product 4L bucket elevator dump, identified as FB-20, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
 - (u) One (1) enclosed Product 4L blender, identified as FB-21, constructed in 2011, with a maximum capacity of 15 tons per hour, uncontrolled, and exhausting to stack EP-5.
 - (v) One (1) polyphosphate blender, identified as FB-22, constructed in 2011, with a maximum capacity of 50 tons per hour, uncontrolled, and exhausting to stack EP-6.
- (The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

D.2.1 PSD Minor Limit [326 IAC 2-2] [326 IAC 2-8]

- (a) The PM emissions from the Liquid Formulation process shall be less than the following:

Emission Unit	Unit ID	PM Limit (lb/ton)
Product 1 Hopper	FB-1	0.0069
Product 1 Pneumatic Conveyor into Bin	FB-2	0.72
Product 1 Auger to Blender	FB-3	0.061
Product 1 Belly Dump Conveyor - Hopper	FB-4	0.0069
Product 1 Pneumatic Conveyor into Bin	FB-5	0.72
Product 1 Auger into Blender	FB-6	0.061
Product 1 Dump Super Sack Contents	FB-7	0.0069
Product 1 Bucket Elevator Conveyance of Super Sack Contents	FB-8	0.0069
Product 1 Bucket Elevator	FB-9	0.0069
Product 1 Blender	FB-10	0.554
Product 2 Auger to Blender	FB-11	0.061
Product 2 Auger to Blender	FB-12	0.0069
Product 2 Bucket Elevator Conveyance of Super Sack Contents	FB-13	0.0069
Product 2 Bucket Elevator Dump	FB-14	0.0069
Product 2 Blender	FB-15	0.554
Product 3 Auger into Blender	FB-16	0.061
Product 3 Blender	FB-17	0.554
Product 4L Dump Super Sack of Contents	FB-18	0.0069

Emission Unit	Unit ID	PM Limit (lb/ton)
Product 4L Bucket Elevator Conveyance of Super Sack Contents	FB-19	0.0069
Product 4L Bucket Elevator Dump	FB-20	0.0069
Product 4L Blender	FB-21	0.554
Polyphosphate Blender	FB-22	0.15

- (b) The PM10/PM2.5 emissions from the Liquid Formulation process shall be less than the following:

Emission Unit	Unit ID	PM10/PM2.5 Limit (lb/ton)
Product 1 Hopper	FB-1	0.0033
Product 1 Pneumatic Conveyor into Bin	FB-2	0.46
Product 1 Auger to Blender	FB-3	0.0034
Product 1 Belly Dump Conveyor - Hopper	FB-4	0.0033
Product 1 Pneumatic Conveyor into Bin	FB-5	0.46
Product 1 Auger into Blender	FB-6	0.0034
Product 1 Dump Super Sack Contents	FB-7	0.0033
Product 1 Bucket Elevator Conveyance of Super Sack Contents	FB-8	0.0033
Product 1 Bucket Elevator	FB-9	0.0033
Product 1 Blender	FB-10	0.134
Product 2 Auger to Blender	FB-11	0.0034
Product 2 Auger to Blender	FB-12	0.0033
Product 2 Bucket Elevator Conveyance of Super Sack Contents	FB-13	0.0033
Product 2 Bucket Elevator Dump	FB-14	0.0033
Product 2 Blender	FB-15	0.134
Product 3 Auger into Blender	FB-16	0.0034
Product 3 Blender	FB-17	0.134
Product 4L Dump Super Sack of Contents	FB-18	0.0033
Product 4L Bucket Elevator Conveyance of Super Sack Contents	FB-19	0.0033
Product 4L Bucket Elevator Dump	FB-20	0.0033
Product 4L Blender	FB-21	0.134
Polyphosphate Blender	FB-22	0.15

- (c) The dry ingredient input to the Liquid Formulation process shall be less than 39,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

D.2.2 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) emissions from the units in the following table shall not exceed the following limits:

Emission Unit	Unit ID	Maximum Process Weight Rate (tons/hr)	6-3-2 PM Limit (lbs/hr)
Product 1 Hopper	FB-1	15	25.16
Product 1 Pneumatic Conveyor into Bin	FB-2	15	25.16
Product 1 Auger to Blender	FB-3	75	48.43
Product 1 Belly Dump Conveyor - Hopper	FB-4	15	25.16
Product 1 Pneumatic Conveyor into Bin	FB-5	15	25.16
Product 1 Auger into Blender	FB-6	75	48.43
Product 1 Dump Super Sack Contents	FB-7	15	25.16
Product 1 Bucket Elevator Conveyance of Super Sack Contents	FB-8	15	25.16
Product 1 Bucket Elevator	FB-9	15	25.16
Product 1 Blender	FB-10	15	25.16
Product 2 Auger to Blender	FB-11	75	48.43
Product 2 Auger to Blender	FB-12	15	25.16
Product 2 Bucket Elevator Conveyance of Super Sack Contents	FB-13	15	25.16
Product 2 Bucket Elevator Dump	FB-14	15	25.16
Product 2 Blender	FB-15	15	25.16
Product 3 Auger into Blender	FB-16	75	48.43
Product 3 Blender	FB-17	15	25.16
Product 4L Dump Super Sack of Contents	FB-18	15	25.16
Product 4L Bucket Elevator Conveyance of Super Sack Contents	FB-19	15	25.16
Product 4L Bucket Elevator Dump	FB-20	15	25.16
Product 4L Blender	FB-21	15	25.16
Polyphosphate Blender	FB-22	50	44.58

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

$$E = 4.10 P^{0.67}$$

and interpolation and extrapolation of the data for process weight rates in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

Where: E = Rate of Emission in pounds per hour
 P = Process weight rate in tons per hour

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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

D.2.4 Visible Emission Notations

- (a) Daily visible emission notations of the Liquid Formulation Process stack exhaust (Stacks EP-3, EP-4, EP-5 and EP-6) shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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

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

D.2.5 Record Keeping Requirements

- (a) In order to demonstrate the compliance status with Condition D.2.1(c), the Permittee shall maintain records of the dry ingredient input to the Liquid Formulation Process for each month and for each compliance period.
- (b) In order to demonstrate the compliance status with Condition D.2.4, the Permittee shall maintain daily records of the visible emission notations of the Liquid Formulation Process stack exhausts (EP-3, EP-4, EP-5 and EP-6). 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) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.2.6 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.2.1(c) shall be submitted using the reporting form located at the end of this permit, or its 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 report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million Btu per hour:
 - (1) Two (2) natural gas-fired boilers, identified as EU-1 and EU-2, constructed in 2010, with a heat input rate of 6 MMBtu per hour and 1 MMBtu per hour, respectively, uncontrolled, and exhausting to stacks EP-9 and EP-10, respectively.

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

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

D.3.1 Particulate [326 IAC 6-2]

Pursuant to 326 IAC 326 IAC 6-2-4, the particulate from the boilers identified as EU-1 and EU-2 shall not exceed 0.6 pound per MMBtu.

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

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

Source Name: Helena Chemical Company - Huntington Terminal
Source Address: 321 Thurman Poe Way, Huntington, Indiana 46750
FESOP Permit No.: F069-29024-00084

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Helena Chemical Company - Huntington Terminal
Source Address: 321 Thurman Poe Way, Huntington, Indiana 46750
FESOP Permit No.: F069-29024-00084

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Helena Chemical Company - Huntington Terminal
Source Address: 321 Thurman Poe Way, Huntington, Indiana 46750
FESOP Permit No.: F069-29024-00084
Facility: Dry Formulation Process
Parameter: Dry ingredient input
Limit: 51,500 tons per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	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**

FESOP Quarterly Report

Source Name: Helena Chemical Company - Huntington Terminal
Source Address: 321 Thurman Poe Way, Huntington, Indiana 46750
FESOP Permit No.: F069-29024-00084
Facility: Liquid Formulation Process
Parameter: Dry ingredient input
Limit: 39,000 tons per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this month.
- Deviation/s occurred in this month.
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
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Helena Chemical Company - Huntington Terminal
Source Address: 321 Thurman Poe Way, Huntington, Indiana 46750
FESOP Permit No.: F069-29024-00084

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>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

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

Source Description and Location

Source Name:	Helena Chemical Company - Huntington Terminal
Source Location:	321 Thurman Poe Way, Huntington, IN 46750
County:	Huntington
SIC Code:	2875 (Fertilizers, Mixing Only)
Operation Permit No.:	F 069-29024-00084
Operation Permit Issuance Date:	August 3, 2010
Significant Permit Revision No.:	069-35336-00084
Permit Reviewer:	Julie Mendez

On October 27, 2014, the Office of Air Quality (OAQ) received an application from Helena Chemical Company - Huntington Terminal related to a modification to an existing stationary dry and liquid fertilizer mixing, storage and distribution operation.

Existing Approvals

The source was issued FESOP No. F069-29024-00084 on August 3, 2010. The source has since received the following approvals:

- (a) Administrative Amendment No. 069-31771-00084, issued on May 30, 2012; and
- (b) Significant Permit Revision No. 069-32253-00084, issued on November 29, 2012; and
- (c) Administrative Amendment No. 069-32909-00084, issued on April 2, 2013; and
- (d) Administrative Amendment No. 069-33811-00084, issued on December 10, 2013.

County Attainment Status

The source is located in Huntington County.

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

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

Fugitive Emissions

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

Status of the Existing Source

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

This PTE table is from the Appendix A of 069-33811-00081, issued on December 10, 2013.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)							
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs
Dry Formulation	140.35	36.04	28.80	-	-	-	-	-
Liquid Formulation	108.80	52.75	50.55	-	-	-	-	0.02
Natural Gas Combustion	0.06	0.26	0.26	0.02	3.38	0.19	2.84	0.06
Storage Tanks	-	-	-	-	-	-	-	-
Total PTE of Entire Source	249.22	89.04	79.61	0.02	3.38	0.19	2.84	0.09
Title V Major Source Thresholds	-	100	100	100	100	100	100	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	-

*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
 **PM_{2.5} listed is direct PM_{2.5}.

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant, is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (c) On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases

(GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed a renewal application, submitted by Helena Chemical Company - Huntington Terminal on October 27, 2014, which included an unpermitted emission unit.

The following is the unpermitted emission units:

- (a) Two (2) micro nutrient storage bins, identified as DF-12, constructed in 2011, uncontrolled, receiving material from bucket elevator DF-10.

Enforcement Issues

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

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Revision

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

Process/ Emission Unit	PTE of Proposed Revision (tons/year)							
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs
DF-12	26.28	26.28	26.28	-	-	-	-	-
Total PTE of Proposed Revision	26.28	26.28	26.28	-	-	-	-	-

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

- (i) PM.
- (ii) PM10.
- (iii) Direct PM2.5.

PTE of the Entire Source After Issuance of the FESOP Revision

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

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)							
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs
Dry Formulation	140.35	36.04	28.80	-	-	-	-	-
Liquid Formulation	108.80	52.75	50.55	-	-	-	-	0.02
Natural Gas Combustion	0.06	0.26	0.26	0.02	3.38	0.19	2.84	0.06
Storage Tanks	-	-	-	-	-	-	-	-
DF-12	0.52	0.52	0.52	-	-	-	-	-
Total PTE of Entire Source	249.22 249.73	89.04 89.55	79.64 80.12	0.02	3.38	0.19	2.84	0.09
Title V Major Source Thresholds	-	100	100	100	100	100	100	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	

*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
 ** PM_{2.5} listed is direct PM_{2.5}.

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted).

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)							
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs
Dry Formulation	140.35	36.04	28.80	-	-	-	-	-
Liquid Formulation	108.80	52.75	50.55	-	-	-	-	0.02
Natural Gas Combustion	0.06	0.26	0.26	0.02	3.38	0.19	2.84	0.06
Storage Tanks	-	-	-	-	-	-	-	-
DF-12	0.52	0.52	0.52	-	-	-	-	-
Total PTE of Entire Source	249.73	89.55	80.12	0.02	3.38	0.19	2.84	0.09
Title V Major Source Thresholds	-	100	100	100	100	100	100	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	

*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
 ** PM_{2.5} listed is direct PM_{2.5}.

(a) FESOP Status

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

(1) Criteria Pollutants

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

- (1) The PM₁₀/PM_{2.5} emissions from DF-12 shall not exceed 0.02 lb/ton.
- (2) The dry ingredient input to the Dry Formulation process shall be less than 51,500 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit PM₁₀ and PM_{2.5} from all other emission units at this source, shall limit the source-wide total potential to emit of PM₁₀ and PM_{2.5} to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(b) PSD Minor Source – PM

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit PM from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

- (1) The PM emissions from DF-12 shall not exceed 0.02 lb/ton.
- (2) The dry ingredient input to the Dry Formulation process shall be less than 51,500 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

- (c) On June 23, 2014, in the case of Utility Air Regulatory Group v. EPA, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

Federal Rule Applicability Determination

- (a) New Source Performance Standards (NSPS)
- (1) The requirements of the New Source Performance Standard for the Phosphate Fertilizer Industry: Wet-Process Phosphoric Acid Plants, Superphosphoric Acid Plants, Diammonium Phosphate Plants, Triple Superphosphate Plants, Granular Triple Superphosphate Storage Facilities, 40 CFR 60, Subparts T, U, V, W and X and 326 IAC 12, are not included for this proposed revision, since the source is not a phosphate fertilizer plant.
- (2) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed revision.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAP)
- (1) There are no National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed revision.
- (c) Compliance Assurance Monitoring (CAM)
- Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

- (a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new unit is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The particulate from DF-12 shall be limited by the following:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 55.0(300 \text{ ton/hr})^{0.11} - 40 \\ E = 63.0 \text{ lb/hr}$$

DF-12 is able to comply with 326 IAC 6-3 without the use of a control device.

Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No: F069-33811-00084, issued on December 10, 2013.

Proposed Changes

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

- (1) The descriptions of the unpermitted units are added to Condition A.2.

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

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

Dry Formulation Process

One (1) Dry Formulation process, identified as DF, ~~with a limited production rate of 50,000 tons per twelve (12) consecutive month period,~~ consisting of the following emission units:

- (z) **Two (2) micro nutrient storage bins, identified as DF-12, constructed in 2011, uncontrolled, receiving material from bucket elevator DF-10.**

(2) The descriptions of the unpermitted units are added to Section D.1.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Dry Formulation Process

One (1) Dry Formulation process, identified as DF, ~~with a limited production rate of 50,000 tons per twelve (12) consecutive month period,~~ consisting of the following emission units:

(z) Two (2) micro nutrient storage bins, identified as DF-12, constructed in 2011, uncontrolled, receiving material from bucket elevator DF-10.

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

(3) The pound per ton limit for DF-12 is added to Condition D.1.1.

D.1.1 PSD Minor Limit [326 IAC 2-2] [326 IAC 2-8]

(a) The PM emissions from the Dry Formulation process shall be less than the following:

Emission Unit	Unit ID	PM Limit (lb/ton)
***	***	***
Micro Nutrient Storage Bins	DF-12	0.02

(b) The PM10/PM2.5 emissions from the Dry Formulation process shall be less than the following:

Emission Unit	Unit ID	PM10/PM2.5 Limit (lb/ton)
***	***	***
Micro Nutrient Storage Bins	DF-12	0.02

(4) DF-12 is added to Condition D.1.2.

D.1.2 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) emissions from the units in the following table shall not exceed the following limits:

Emission Unit	Unit ID	Maximum Process Weight Rate (tons/hr)	6-3-2 PM Limit (lbs/hr)
***	***	***	***
Micro Nutrient Storage Bins	DF-12	300	63.00

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on October 27, 2014.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 069-35336-00084. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Julie Mendez at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-1243 or toll free at 1-800-451-6027 extension 4-1243.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations
Emissions Summary**

**Company Name: Helena Chemical Company - Huntington Terminal
Address City IN Zip: 321 Thurman Poe Way, Huntington, Indiana 46750
Permit Number: 069-35336-00084
Reviewer: Julie Mendez**

Potential Emissions

Pollutants	Dry Formulation (Including DF-12)	Liquid Formulation	Natural Gas Combustion	Unpaved Roads	Storage Tanks*	Total
PM	>250	>250	0.06	604.60	0.00	>250
PM10	>250	>250	0.26	154.09	0.00	>250
PM2.5	>250	>250	0.26	15.41	0.00	>250
SO2	0.00	0.00	0.02	0.00	0.00	0.02
NOx	0.00	0.00	3.38	0.00	0.00	3.38
VOC	0.00	0.00	0.19	0.00	0.00	0.19
CO	0.00	0.00	2.84	0.00	0.00	2.84
CO2e	0.00	0.00	4086.03	0.00	0.00	4086.03
Total HAPs	0.00E+00	1.35E-01	6.39E-02	0.00E+00	0.00E+00	1.98E-01
Worst-Case Individual HAP	0.00E+00	1.35E-01 (Fluorides)	6.09E-02 (Hexane)	0.00E+00	0.00E+00	1.35E-01 (Hexane)

Unpaved roads are considered sources of 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.

The source determined that the potential PM, PM10 and PM2.5 emissions exceed 250 tons per year, as indicated in FESOP No. 069-29024-00084, issued on August 3, 2012

Limited Emissions

Pollutants	Dry Formulation (Including DF-12)	Liquid Formulation	Natural Gas Combustion	Unpaved Roads	Storage Tanks*	Total
PM	140.87	108.80	0.06	604.60	0.00	249.73
PM10	36.55	52.75	0.26	154.09	0.00	89.55
PM2.5	29.32	50.55	0.26	15.41	0.00	80.12
SO2	0.00	0.00	0.02	0.00	0.00	0.02
NOx	0.00	0.00	3.38	0.00	0.00	3.38
VOC	0.00	0.00	0.19	0.00	0.00	0.19
CO	0.00	0.00	2.84	0.00	0.00	2.84
CO2e	0.00	0.00	4086.03	0.00	0.00	4086.03
Total HAPs	0.00E+00	2.34E-02	6.39E-02	0.00E+00	0.00E+00	8.73E-02
Worst-Case Individual HAP	0.00E+00	2.34E-02 (Fluorides)	6.09E-02 (Hexane)	0.00E+00	0.00E+00	6.09E-02 (Hexane)

* Storage tanks do not contain volatile organic liquids. There are no emissions from the storage tanks

**Appendix A: Emissions Calculations
DF-12**

Company Name: Helena Chemical Company - Huntington Terminal
Address City IN Zip: 321 Thurman Poe Way, Huntington, Indiana 46750
Permit Number: 069-35336-00084
Reviewer: Julie Mendez

Process	Unit ID	Pollutant	Emission Factor lb/ton	Throughput tons/hr	Potential to Emit		Limited tons/year	Limited Potential to Emit	
					lb/hr	tons/year		lb/year	tons/year
Bucket Elevator Dump to Micro Nutrient Product Bins	DF-12	PM	0.02	300	6.00	26.28	51,500	1030	0.52
		PM10	0.02		6.00	26.28		1030	0.52
		PM2.5	0.02		6.00	26.28		1030	0.52

Emission Factors from AP-42 (Fifth Edition), Table 8.3-2 (7/93). Assume PM = PM10 = PM2.5.

Methodology

Potential to Emit (lb/hr) = Emission Factor (lb/ton) x Throughput (ton/hr)

Potential to Emit (tons/year) = Potential to Emit (lb/hr) x (1 ton/2000 pounds) x 8760 hr/year

Limited Potential to Emit (lb/year) = Emission Factor (lb/ton) x Limited Throughput (tons/year)

Limited Potential to Emit (tons/year) = Limited Potential to Emit (lb/year) x (1 ton/2000 pounds)

**Appendix A: Emissions Calculations
Dry Formulation Process**

**Company Name: Helena Chemical Company - Huntington Terminal
Address City IN Zip: 321 Thurman Poe Way, Huntington, Indiana 46750
Permit Number: 069-35336-00084
Reviewer: Julie Mendez**

Limited Dry Formulation Process

Process	Unit ID	Pollutant	Emission Factor lb/ton	Limited Maximum Throughput tons/year	Limited Potential Emissions	
					lb/year	tons/year
Rail Unloading*	DF-1A	PM	6.90E-03	25750	177.68	0.09
		PM10	3.30E-03		84.98	0.04
		PM2.5	3.30E-03		84.98	0.04
Truck Unloading*	DF-1B	PM	6.90E-03	25750	177.68	0.09
		PM10	3.30E-03		84.98	0.04
		PM2.5	3.30E-03		84.98	0.04
Conveyor	DF-2	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Bucket Elevator	DF-3	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Elevator Dump to Pile - Aggregate Material	DF-4	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Front-End Loader Dump	DF-5	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Floor Inlet with Conditioner - Wholesale	DF-6	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Wholesale Conveyor	DF-8	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.01
Wholesale Bucket Elevator	DF-10	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Wholesale Bucket Elevator Dump	DF-11	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Retail Bucket Elevator Dump to Bin	DF-13	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Truck Unloading - Product 4	DF-14	PM	0.544	51500	28016.00	14.01
		PM10	0.134		6901.00	3.45
		PM2.5	0.134		6901.00	3.45
Conveyor - Product 4	DF-15	PM	0.544	51500	28016.00	14.01
		PM10	0.134		6901.00	3.45
		PM2.5	0.134		6901.00	3.45
Bin Loading - Product 4	DF-16	PM	0.544	51500	28016.00	14.01
		PM10	0.134		6901.00	3.45
		PM2.5	0.134		6901.00	3.45
Skid Loader - Product 4	DF-17	PM	0.544	51500	28016.00	14.01
		PM10	0.134		6901.00	3.45
		PM2.5	0.134		6901.00	3.45
Skid Loader Dump - Product 4	DF-18	PM	0.544	51500	28016.00	14.01
		PM10	0.134		6901.00	3.45
		PM2.5	0.134		6901.00	3.45
Bucket Elevator Dump	DF-19	PM	0.544	51500	28016.00	14.01
		PM10	0.134		6901.00	3.45
		PM2.5	0.134		6901.00	3.45
Bucket Elevator Dump	DF-20	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Bin Dump - Wholesale	DF-21	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Bin Dump - Retail	DF-22	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Bin Dump - Retail Product 4	DF-23	PM	0.544	51500	28016.00	14.01
		PM10	0.134		6901.00	3.45
		PM2.5	0.134		6901.00	3.45
Blender - Retail	DF-24	PM	0.544	51500	28016.00	14.01
		PM10	0.134		6901.00	3.45
		PM2.5	0.134		6901.00	3.45
Bin Dump - Wholesale Loadout	DF-25	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Bin Dump - Retail Loadout	DF-26A	PM	6.90E-03	51500	355.35	0.18
		PM10	3.30E-03		169.95	0.08
		PM2.5	3.30E-03		169.95	0.08
Bin Dump - Retail Loadout - Product 4	DF-26B	PM	0.995	51500	51242.50	25.62
		PM10	0.278		14317.00	7.16
		PM2.5	0.278		14317.00	7.16
Storage Piles**	DF-27	PM	2.84E-07	51500	1.46E-02	7.31E-06
		PM10	1.34E-07		6.90E-03	3.45E-06
		PM2.5	2.03E-08		1.05E-03	5.23E-07
Total		PM			140.35	
		PM10			36.04	
		PM2.5			28.80	

Emission Factors from AP-42, Fifth Edition, Volume I, Chapter 11.12, Table 11.12-2

* The Rail and Truck Unloading cannot operate simultaneously. 50% of the limited maximum throughput will be unloaded by truck and 50% unloaded by rail.

**Storage piles are considered sources of fugitive emissions. The potential fugitive emissions from the Storage Piles is limited to less than 25 tons per year because the Dry Formulation Process is limited to 50,000 tons of product per twelve (12) consecutive month period. Therefore, the storage piles are not subject to 326 IAC 6-5.

Methodology

Limited Potential Emissions (lb/year) = Emission Factor (lb/ton) x Limited Throughput (tons/year)
Limited Potential Emissions (tons/year) = Limited Potential Emissions (lb/year) x (1 ton/2000 pounds)

Note:

The Limited Emissions Table above is from FESOP 069-31771-00084, issued on May 30, 2012.

Appendix A: Emissions Calculations
Liquid Formulation Process

Company Name: Helena Chemical Company - Huntington Terminal
Address City IN Zip: 321 Thurman Poe Way, Huntington, Indiana 46750
Permit Number: 069-35336-00084
Reviewer: Julie Mendez

Limited Liquid Formulation

Process	Emission Unit	Unit ID	Pollutant	Emission Factor lb/ton	Limited Maximum Throughput tons/hour	Limited Potential Emissions**		
						lb/hour	tons/year	
Product 1	Hopper	FB-1	PM	6.90E-03	15	0.10	0.13	
			PM10	3.30E-03		0.05	0.06	
			PM2.5	3.30E-03		0.05	0.06	
	Pneumatic Conveyor into Bin	FB-2	PM	0.72	15	10.80	14.04	
			PM10	0.46		6.90	8.97	
			PM2.5	0.46		6.90	8.97	
	Auger to Blender	FB-3	PM	0.061	15	0.92	1.19	
			PM10	0.034		0.51	0.66	
			PM2.5	0.0058		0.09	0.11	
	Belly Dump Conveyor - Hopper	FB-4	PM	6.90E-03	15	0.10	0.13	
			PM10	3.30E-03		0.05	0.06	
			PM2.5	3.30E-03		0.05	0.06	
	Pneumatic Conveyor into Bin	FB-5	PM	0.72	15	10.80	14.04	
			PM10	0.46		6.90	8.97	
			PM2.5	0.46		6.90	8.97	
	Auger into Blender	FB-6	PM	0.061	15	0.92	1.19	
			PM10	0.034		0.51	0.66	
			PM2.5	0.006		0.09	0.11	
	Dump Super Sack Contents	FB-7	PM	6.90E-03	15	0.10	0.13	
			PM10	3.30E-03		0.05	0.06	
			PM2.5	3.30E-03		0.05	0.06	
	Bucket Elevator Conveyance of Super Sack	FB-8	PM	6.90E-03	15	0.10	0.13	
			PM10	3.30E-03		0.05	0.06	
			PM2.5	3.30E-03		0.05	0.06	
	Bucket Elevator Dump	FB-9	PM	6.90E-03	15	0.10	0.13	
			PM10	3.30E-03		0.05	0.06	
			PM2.5	3.30E-03		0.05	0.06	
	Blender	FB-10	PM	0.554	15	8.31	10.80	
			PM10	0.134		2.01	2.61	
			PM2.5	0.134		2.01	2.61	
Product 2	Hopper	FB-1	PM	6.90E-03	15	0.10	0.13	
			PM10	3.30E-03		0.05	0.06	
			PM2.5	3.30E-03		0.05	0.06	
	Pneumatic Conveyor into Bin	FB-2	PM	0.72	15	10.80	14.04	
			PM10	0.46		6.90	8.97	
			PM2.5	0.46		6.90	8.97	
	Auger to Blender	FB-11	PM	0.061	15	0.92	1.19	
			PM10	0.034		0.51	0.66	
			PM2.5	0.0058		0.09	0.11	
	Dump Super Sack Contents	FB-12	PM	6.90E-03	15	0.10	0.13	
			PM10	3.30E-03		0.05	0.06	
			PM2.5	3.30E-03		0.05	0.06	
	Bucket Elevator Conveyance of Super Sack	FB-13	PM	6.90E-03	15	0.10	0.13	
			PM10	3.30E-03		0.05	0.06	
			PM2.5	3.30E-03		0.05	0.06	
	Bucket Elevator Dump	FB-14	PM	6.90E-03	15	0.10	0.13	
			PM10	3.30E-03		0.05	0.06	
			PM2.5	3.30E-03		0.05	0.06	
	Blender	FB-15	PM	0.554	15	8.31	10.80	
			PM10	0.134		2.01	2.61	
			PM2.5	0.134		2.01	2.61	
	Product 3	Hopper	FB-1	PM	6.90E-03	15	0.10	0.13
				PM10	3.30E-03		0.05	0.06
				PM2.5	3.30E-03		0.05	0.06
		Pneumatic Conveyor into Bin	FB-2	PM	0.72	15	10.80	14.04
				PM10	0.46		6.90	8.97
				PM2.5	0.46		6.90	8.97
		Auger into Blender	FB-16	PM	0.061	15	0.92	1.19
				PM10	0.034		0.51	0.66
				PM2.5	0.0058		0.09	0.11
Blender		FB-17	PM	0.554	15	8.31	10.80	
			PM10	0.134		2.01	2.61	
			PM2.5	0.134		2.01	2.61	
Product 4	Dump Super Sack Contents	FB-18	PM	6.90E-03	15	0.10	0.13	
			PM10	3.30E-03		0.05	0.06	
			PM2.5	3.30E-03		0.05	0.06	
	Bucket Elevator Conveyance of Super Sack	FB-19	PM	6.90E-03	15	0.10	0.13	
			PM10	3.30E-03		0.05	0.06	
			PM2.5	3.30E-03		0.05	0.06	
	Bucket Elevator Dump	FB-20	PM	6.90E-03	15	0.10	0.13	
			PM10	3.30E-03		0.05	0.06	
			PM2.5	3.30E-03		0.05	0.06	
	Blender	FB-21	PM	0.554	15	8.31	10.80	
			PM10	0.134		2.01	2.61	
			PM2.5	0.134		2.01	2.61	
Polyphosphate Blender*	FB-22	PM	0.15	15	2.25	2.93		
		PM10	0.15		2.25	2.93		
		PM2.5	0.15		2.25	2.93		
		Fluorides	0.0012		0.02	0.02		
		PM			83.70	108.80		
		PM10			40.57	52.75		
Total		PM			38.88	50.55		
		PM10			40.57	52.75		
		PM2.5			38.88	50.55		
		Fluorides			0.02	0.02		

Emission Factors from AP-42, Fifth Edition, Volume I, Chapter 11.12, Table 11.12-2

* Polyphosphate Blender emission factors from a stack test from a similar unit permitted by Texas Committee on Environmental Quality

** Liquid Formulation Process is limited to less than 2600 operating hours per twelve (12) consecutive month period.

Methodology

Limited Potential Emissions (lb/hour) = Emission Factor (lb/ton) x Limited Maximum Throughput (ton/hour)

Limited Potential Emissions (tons/year) = Limited Potential Emissions (lb/hour) x 2600 (hour/year) x (1 ton/2000 lb)

Note:

The Limited Emissions Table above is from FESOP 069-31771-00084, issued on May 30, 2012.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

**Company Name: Helena Chemical Company - Huntington Terminal
Address City IN Zip: 321 Thurman Poe Way, Huntington, Indiana 46750
Permit Number: 069-35336-00084
Reviewer: Julie Mendez**

Source-Wide Total
Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

Emission Unit	MMBtu/hr
Boiler EU-1	6.000
Boiler EU-2	1.000
Space Heater LF#1	0.400
Evaporator LE#1	0.327
Total	7.727

7.727

67.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10/PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.064	0.257	0.020	3.384	0.186	2.843

*PM emission factor is filterable PM only. PM10/PM2.5 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

Emission Factor in lb/MMcf	HAPs - Organics					Total Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	7.107E-05	4.061E-05	2.538E-03	6.092E-02	1.151E-04	6.368E-02

Emission Factor in lb/MMcf	HAPs - Metals					Total Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.692E-05	3.723E-05	4.738E-05	1.286E-05	7.107E-05	1.855E-04

Methodology is the same as above.

Total HAPs	6.387E-02
Worst HAP (Hexane)	6.092E-02

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	4,061	0.1	0.1
Summed Potential Emissions in tons/yr	4,061		
CO2e Total in tons/yr	4,086		

Methodology

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

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

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

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

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

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

Company Name: **Helena Chemical Company - Huntington Terminal**
 Address City IN Zip: **321 Thurman Poe Way, Huntington, Indiana 46750**
 Permit Number: **069-35336-00084**
 Reviewer: **Julie Mendez**

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per hour per vehicle	Maximum trips per day (trip/hour)	Maximum Weight Loaded (tons/trip)	Total Weight driven per hour (ton/hr)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/hr)	Maximum one-way miles (miles/yr)
Tanks (Inbound)	1.0	2.7	2.7	1.3	3.4	2006	0.380	1.0	8986.0
Tanks (Outbound)	1.0	2.7	2.7	3.5	9.5	2006	0.380	1.0	8986.0
Dry Product Outbound (Entering Vehicles)	1.0	9.0	9.0	15.0	135.0	2692	0.510	4.6	40196.5
Dry Product Outbound (Exiting Vehicles)	1.0	9.0	9.0	25.0	225.0	2692	0.510	4.6	40196.5
Product Outbound (Entering Vehicles)	1.0	8.0	8.0	15.0	120.0	2270	0.430	3.4	30129.1
Product Outbound (Exiting Vehicles)	1.0	8.0	8.0	25.0	200.0	2270	0.430	3.4	30129.1
Product Receipt (Entering Vehicles)	1.0	5.3	5.3	40.0	212.0	2270	0.430	2.3	19960.5
Product Receipt (Exiting Vehicles)	1.0	5.3	5.3	25.0	132.5	2270	0.430	2.3	19960.5
X Product Receipt (Entering Vehicles)	1.0	9.0	9.0	40.0	360.0	2534	0.480	4.3	37837.2
X Product Receipt (Exiting Vehicles)	1.0	9.0	9.0	25.0	225.0	2534	0.480	4.3	37837.2
Product Loadout (Entering Vehicles)	1.0	0.2	0.2	40.0	8.0	2006	0.380	0.1	665.6
Product Loadout (Exiting Vehicles)	1.0	0.2	0.2	25.0	5.0	2006	0.380	0.1	665.6
Formulation to Warehouse (Entering Vehicles)	1.0	0.9	0.9	30.0	27.0	1584	0.300	0.3	2365.2
Warehouse to Formulation (Exiting Vehicles)	1.0	0.9	0.9	15.0	13.5	1584	0.300	0.3	2365.2
Total			70.2		1675.8			32.0	260280.2

Average Vehicle Weight Per Trip = $\frac{23.9}{0.46}$ tons/trip
 Average Miles Per Trip = $\frac{23.9}{0.46}$ miles/trip

Unmitigated Emission Factor, $E_f = k \cdot (s/12)^a \cdot [(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-3 Sand/Gravel Processing Plant Road)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2)
W =	23.9	23.9	23.9	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E_f \cdot [(365 - P)/365]$
 Mitigated Emission Factor, $E_{ext} = E_f \cdot [(365 - P)/365]$
 where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, E_f	6.56	1.67	0.17	lb/mile
Mitigated Emission Factor, E_{ext}	4.31	1.10	0.11	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Ammonia Nurse Tanks (Inbound)	29.48	7.51	0.75	19.38	4.94	0.49	9.69	2.47	0.25
Ammonia Nurse Tanks (Outbound)	29.48	7.51	0.75	19.38	4.94	0.49	9.69	2.47	0.25
Dry Product Outbound (Entering Vehicles)	131.87	33.61	3.36	86.71	22.10	2.21	43.35	11.05	1.10
Dry Product Outbound (Exiting Vehicles)	131.87	33.61	3.36	86.71	22.10	2.21	43.35	11.05	1.10
Product Outbound (Entering Vehicles)	98.84	25.19	2.52	64.99	16.56	1.66	32.50	8.28	0.83
Product Outbound (Exiting Vehicles)	98.84	25.19	2.52	64.99	16.56	1.66	32.50	8.28	0.83
Product Receipt (Entering Vehicles)	65.48	16.69	1.67	43.06	10.97	1.10	21.53	5.49	0.55
Product Receipt (Exiting Vehicles)	65.48	16.69	1.67	43.06	10.97	1.10	21.53	5.49	0.55
X Product Receipt (Entering Vehicles)	124.13	31.64	3.16	81.62	20.80	2.08	40.81	10.40	1.04
X Product Receipt (Exiting Vehicles)	124.13	31.64	3.16	81.62	20.80	2.08	40.81	10.40	1.04
Ammonia Product Loadout (Entering Vehicles)	2.18	0.56	0.06	1.44	0.37	0.04	0.72	0.18	0.02
Ammonia Product Loadout (Exiting Vehicles)	2.18	0.56	0.06	1.44	0.37	0.04	0.72	0.18	0.02
Formulation to Warehouse (Entering Vehicles)	7.76	1.98	0.20	5.10	1.30	0.13	2.55	0.65	0.07
Warehouse to Formulation (Exiting Vehicles)	7.76	1.98	0.20	5.10	1.30	0.13	2.55	0.65	0.07
Total	919.49	234.34	23.43	604.60	154.09	15.41	302.30	77.04	7.70

Methodology

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

Abbreviations

- PM = Particulate Matter
- PM10 = Particulate Matter (<10 um)
- PTE = Potential to Emit



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

January 16, 2015

Herald Press
7 North Jefferson
Huntington, IN 46750

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Helena Chemical Company – Huntington Terminal, Huntington County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than January 20, 2015.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Julie Mendez at 800-451-6027 and ask for extension 4-1243 or dial 317-234-1243.

Sincerely,

Greg Hotopp

Greg Hotopp
Permit Branch
Office of Air Quality

Permit Level: Significant Permit Revision
Permit Number: 069-35336-00084

Enclosure

PN Newspaper.dot 6/13/2013



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

January 16, 2015

To: Huntington Public Library

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

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

Applicant Name: Helena Chemical Company – Huntington Terminal
Permit Number: 069-35336-00084

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

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

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

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

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 6/13/2013



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

January 16, 2015

Mr. Terry Drottz
Helena Chemical Company – Huntington Terminal
321 Thurman Poe Way
Huntington, IN 46750

Re: Public Notice
Helena Chemical Company – Huntington Terminal
Permit Level: Significant Permit Revision
Permit Number: 069-35336-00084

Dear Mr. Drottz:

Enclosed is a copy of your draft Significant Permit Revision, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Herald Press in Huntington, Indiana publish the abbreviated version of the public notice no later than January 20, 2015. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Huntington Park Library, 200 West Market Street in Huntington, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Julie Mendez, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-1243 or dial (317) 234-1243.

Sincerely,

Greg Hotopp

Greg Hotopp
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter-2014. Dot4/10/14



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

Notice of Public Comment

January 16, 2015
Helena Chemical Company – Huntington Terminal
069-35336-00084

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 6/13/13

Mail Code 61-53

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1		Terry Drottz Helena Chemical Company-Huntington Terminal 321 Thurman Poe Way Huntington IN 46750 (Source CAATS)										
2		Randy Parman VP NBU Helena Chemical Company-Huntington Terminal 4548 Corporate Dr Ste 170 West Des Moines IA 50266 (RO CAATS)										
3		Huntington Town Council and Mayors Office 300 Cherry St. Huntington IN 46750 (Local Official)										
4		Huntington County Board of Commissioners 354 N. Jefferson St. Suite 201 Huntington IN 46750 (Local Official)										
5		Huntington City Twp Public Library 200 W Market Huntington IN 46750-2655 (Library)										
6		Frederick & Iva Moore 6019 W 650 N Ligonier IN 46767 (Affected Party)										
7		Ms. Mary Shipley 10968 E 100 S Marion IN 46953 (Affected Party)										
8		Huntington County Health Department 354 N. Jefferson Street, Suite 201 Huntington IN 46750 (Health Department)										
9		Pam & Chuck Homier 601 East Lamont Rd Huntington IN 46750 (Affected Party)										
10		Melvin & Deborah Gillespie 5616 N 200 E Huntington IN 46750 (Affected Party)										
11		David A Weeks Risk Management & Engineering, Ltd 2218 South Jupiter Road, Suite 103 Garland TX 75041 (Consultant)										
12												
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