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

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Review and
Transition from a Permit by Rule to
Minor Source Operating Permit (MSOP)

for Purina Animal Nutrition, LLC in Vanderburgh County

MSOP No.: M163-36601-00033

The Indiana Department of Environmental Management (IDEM) has received an application from Purina Animal Nutrition, LLC, located at 2124 Lynch Rd., Evansville, IN 47711, for a new source review and transition from a Permit by Rule to a MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Purina Animal Nutrition, LLC to operate at an existing an existing stationary nutrient block and animal feed manufacturing facility .

This draft MSOP does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

IDEM is aware that the block mixers and block press have been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft MSOP 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:

Evansville Vanderburgh Public Library
3001 Oaklyn Dr.
Evansville, IN 47711

and

IDEM Southwest Regional Office
1120 N. Vincennes Avenue
P.O. Box 128
Petersburg, IN 47567-0128

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 M163-36601-00033 in all correspondence.

Comments should be sent to:

Adam Wheat
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-8397
Or dial directly: (317) 233-8397
Fax: (317) 232-6749 attn: Adam Wheat
E-mail: awheat@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 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.

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, at the IDEM Regional Office 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 Adam Wheat of my staff at the above address.

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

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

DRAFT

New Source Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

Purina Animal Nutrition, LLC
2124 Lynch Rd.
Evansville, Indiana 47711

(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.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

Operation Permit No. M163-36601-00033	
Issued by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary nutrient block and animal feed manufacturing facility.

Source Address:	2124 Lynch Rd., Evansville, Indiana 47711
General Source Phone Number:	812-424-5501
SIC Code:	2048
County Location:	Vanderburgh
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source 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

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

(a) One (1) grain receiving area, identified as Receiving-1, constructed in 1971, with a maximum capacity of 25 tons of grain per hour, using no control device, and exhausting fugitively outdoors.

(b) One (1) truck receiving area, identified as Receiving-2, constructed in 1971, with a maximum capacity of 25 tons of grain or minerals per hour, using no control device, and exhausting fugitively outdoors.

(c) One (1) bin loading and grain handling operation, identified as Handling-1, constructed in 1971, with a maximum capacity of 50 tons per hour, using no control device, and exhausting outdoors.

(d) One (1) hammermill, identified as HM-1, constructed in 1971, with a maximum throughput of 3.0 tons per hour of grain, using a cyclone as control, identified as Hammermill Cyclone #2, and exhausting to stack #2.

(e) One (1) grain cracker, identified as GC-1, constructed in 2014, with a maximum capacity of 1.50 tons per hour of grain, using no controls, and exhausting indoors.

(f) One (1) mixing operation, identified as Mixer-1, constructed in 1971, with a maximum capacity of 18 tons per hour of grain, with the mixer covered during the addition and mixing of materials, using no controls, and exhausting into a surge hopper.

(g) One (1) micro room, identified as Micro-1, constructed in 1975, with a maximum capacity of 0.25 tons per hour of micro ingredients, using a baghouse for control, identified as Micro Filter #4, and exhausting to stack #4.

(h) One (1) pelleting operation including two (2) pellet mills, identified as CPM-1 and CPM-2, and one (1) pellet cooler, identified as CPM cooler, each constructed in 1982, with a

combined maximum throughput of 10 tons per hour, using a cyclone for controls, identified as Pellet Cyclone #1, and exhausting through stack #1.

(i) One (1) bulk loadout operation, identified as Loadout-1, constructed in 1971, with a maximum throughput of 25 tons per hour, using no controls, and exhausting fugitively outdoors.

(j) One (1) packing operation, identified as Packing-1, constructed in 1971, with a maximum throughput of 10 tons per hour, using a cyclone and baghouse for controls, identified as Packer Filter #3, and exhausting to the indoors.

(k) Two (2) block mixing operations, identified as Mixer-2 and Mixer-3, constructed in 1975 and 2014 respectively, with a maximum throughput of 2.0 tons per hour each, with the mixers covered during the addition and mixing of materials, using no controls, and exhausting into a surge hopper.

(l) Two (2) block presses, identified as block line 1 and 2, constructed in 1975 and 2014 respectively, with a maximum throughput of 2.0 tons per hour each, using no controls, and exhausting indoors.

(m) Fifteen (15) grain storage bins, with a combined maximum capacity of 60,417 cubic feet, and exhausting to the atmosphere.

(n) Fourteen (14) mineral storage bins, with a combined maximum capacity of 29,979 cubic feet, and exhausting to the atmosphere.

(o) One (1) natural gas-fired boiler, identified as B-1, constructed in 1971, with a maximum heat input capacity of 6.277 MMBtu/hr, with no controls, and exhausting to stack BR.

(p) Paved and unpaved roads.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) 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]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 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 described in the application or the permit. The emission units covered in this permit may continue operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as described.

(b) If actual construction of the emission units differs from the construction described in the application, the source may not continue 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 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, M163-36601-00033, 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

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

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

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

B.9 Duty to Provide Information

(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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 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

(c) The notification 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.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3]

(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 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.

(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.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M163-36601-00033 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.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-6.1-7.

B.14 Permit Renewal [326 IAC 2-6.1-7]

(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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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 one hundred twenty (120) days 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 2-6.1 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.16 Source Modification Requirement

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

B.17 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][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 permitted 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.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.19 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.

(b) 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.20 Credible Evidence [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 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three

(3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

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

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.12 Instrument Specifications [326 IAC 2-1.1-11]

(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

C.13 Response to Excursions or Exceedances

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

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

(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.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

(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. 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.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of 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

(b) 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.

(c) 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) grain receiving area, identified as Receiving-1, constructed in 1971, with a maximum capacity of 25 tons of grain per hour, using no control device, and exhausting fugitively outdoors.

(b) One (1) truck receiving area, identified as Receiving-2, constructed in 1971, with a maximum capacity of 25 tons of grain or minerals per hour, using no control device, and exhausting fugitively outdoors.

(c) One (1) bin loading and grain handling operation, identified as Handling-1, constructed in 1971, with a maximum capacity of 50 tons per hour, using no control device, and exhausting outdoors.

(d) One (1) hammermill, identified as HM-1, constructed in 1971, with a maximum throughput of 3.0 tons per hour of grain, using a cyclone as control, identified as Hammermill Cyclone #2, and exhausting to stack #2.

(e) One (1) grain cracker, identified as GC-1, constructed in 2014, with a maximum capacity of 1.50 tons per hour of grain, using no controls, and exhausting indoors.

(g) One (1) micro room, identified as Micro-1, constructed in 1975, with a maximum capacity of 0.25 tons per hour of micro ingredients, using a baghouse for control, identified as Micro Filter #4, and exhausting to stack #4.

(h) One (1) pelleting operation including two (2) pellet mills, identified as CPM-1 and CPM-2, and one (1) pellet cooler, identified as CPM cooler, each constructed in 1982, with a combined maximum throughput of 10 tons per hour, using a cyclone for controls, identified as Pellet Cyclone #1, and exhausting through stack #1.

(i) One (1) bulk loadout operation, identified as Loadout-1, constructed in 1971, with a maximum throughput of 25 tons per hour, using no controls, and exhausting fugitively outdoors.

(j) One (1) packing operation, identified as Packing-1, constructed in 1971, with a maximum throughput of 10 tons per hour, using a cyclone and baghouse for controls, identified as Packer Filter #3, and exhausting to the indoors.

(l) Two (2) block presses, identified as block line 1 and 2, constructed in 1975 and 2014 respectively, with a maximum throughput of 2.0 tons per hour each, using no controls, and exhausting indoors.

(m) Fifteen (15) grain storage bins, with a combined maximum capacity of 60,417 cubic feet, and exhausting to the atmosphere.

(n) Fourteen (14) mineral storage bins, with a combined maximum capacity of 29,979 cubic feet, and exhausting to the atmosphere.

(p) Paved and unpaved roads.

(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 2-6.1-5(a)(1)]

D.1.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1]

(a) Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from each of the following emission units shall not exceed 0.03 grain per dry standard cubic foot (grains/dscf).

Emission Unit
Gain receiving area (Receiving-1)
Truck receiving area (Receiving-2)
Bin loading and grain handling operation (Handling-1)
Hammermill (HM-1)
Grain cracker (GC-1)
Micro room (Micro-1)
Pellet mills (CPM-1 and CPM-2) and pellet cooler (CPM cooler)
Bulk loadout operation (Loadout-1)
Packing operation (Packing-1)
Block presses (block line 1 and 2)
Grain storage bins
Mineral storage bins
Paved and unpaved roads.

(b) Pursuant to 326 IAC 6.5-1-2(d)(2) (Particulate Matter Limitations Except Lake County), the Permittee shall comply with the following for operations associated with the grain elevator:

The Permittee shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:

(1) Housekeeping practices shall be conducted as follows:

(A) Areas to be swept and maintained shall include, at a minimum, the following:

(i) General grounds, yard, and other open areas.

(ii) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.

(iii) Grain driers with respect to accumulated particulate matter.

(B) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.

(C) Dust from driveways, access roads, and other areas of travel shall be controlled.

(D) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

(2) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:

(A) Malfunctions.
(B) Breakdowns.
(C) Improper adjustment.

(D) Operating above the rated or designed capacity.
(E) Not following designed operating specifications.
(F) Lack of good preventive maintenance care.
(G) Lack of critical and proper spare replacement parts on hand.
(H) Lack of properly trained and experienced personnel.

(3) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined under 326 IAC 5-1.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.3 Particulate Control

(a) In order assure compliance with Condition D.1.1, each of the control device(s) associated with the emission units specified in the table below shall be in operation and control particulate emissions from the respective emission unit at all times that the emission unit is in operation.

Emission Unit	Control Device
Hammermill (HM-1)	Hammermill Cyclone #2
Micro room (Micro-1)	Baghouse (Micro Filter #4)
Pellet mills (CPM-1 and CPM-2) and pellet cooler (CPM cooler)	Pellet Cyclone #1
Packing operation (Packing-1)	Cyclone and Baghouse (Packer Filter #3)

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

Compliance Monitoring Requirements

D.1.4 Visible Emissions Notations

(a) Daily visible emission notations of the pellet cyclone stack exhaust #1 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 a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's

obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

D.1.5 Cyclone Failure Detection

In the event that cyclone failure has been observed:

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

Record Keeping and Reporting Requirement [326 IAC 2-6.1-5(a)(2)]

D.1.6 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.4, the Permittee shall maintain daily records of the visible emission notations of the pellet cooler stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(o) One (1) natural gas-fired boiler, identified as B-1, constructed in 1971, with a maximum heat input capacity of 6.277 MMBtu/hr, with no controls, and exhausting to stack BR.

(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 2-6.1-5(a)(1)]

D.2.1 Particulate Matter Limitations except Lake County [326 IAC 6.5]

Pursuant to 326 IAC 6.5-1-2(a), the particulate matter (PM) from the one (1) natural gas-fired boiler (B-1) shall not exceed one hundredth (0.01) grain per dry standard cubic foot (dscf).

SECTION E.1 NESHAP

Emissions Unit Description:

(b) One (1) truck receiving area, identified as Receiving-2, constructed in 1971, with a maximum capacity of 25 tons of grain or minerals per hour, using no control device, and exhausting fugitively outdoors.

(c) One (1) bin loading and grain handling operation, identified as Handling-1, constructed in 1971, with a maximum capacity of 50 tons per hour, using no control device, and exhausting outdoors.

(f) One (1) mixing operation, identified as Mixer-1, constructed in 1971, with a maximum capacity of 18 tons per hour of grain, with the mixer covered during the addition and mixing of materials, using no controls, and exhausting indoors.

(g) One (1) micro room, identified as Micro-1, constructed in 1975, with a maximum capacity of 0.25 tons per hour of micro ingredients, using a baghouse for control, identified as Micro Filter #4, and exhausting to stack #4.

(h) One (1) pelleting operation including two (2) pellet mills, identified as CPM-1 and CPM-2, and one (1) pellet cooler, identified as CPM cooler, each constructed in 1982, with a combined maximum throughput of 10 tons per hour, using a cyclone for controls, identified as Pellet Cyclone #1, and exhausting through stack #1.

(i) One (1) bulk loadout operation, identified as Loadout-1, constructed in 1971, with a maximum throughput of 25 tons per hour, using no controls, and exhausting fugitively outdoors.

(j) One (1) packing operation, identified as Packing-1, constructed in 1971, with a maximum throughput of 10 tons per hour, using a cyclone and baghouse for controls, identified as Packer Filter #3, and exhausting to the indoors.

(k) Two (2) block mixing operations, identified as Mixer-2 and Mixer-3, constructed in 1975 and 2014 respectively, with a maximum throughput of 2.0 tons per hour each, with the mixers covered during the addition and mixing of materials, using no controls, and exhausting indoors.

(l) Two (2) block presses, identified as block line 1 and 2, constructed in 1975 and 2014 respectively, with a maximum throughput of 2.0 tons per hour each, using no controls, and exhausting indoors.

(n) Fourteen (14) mineral storage bins, with a combined maximum capacity of 29,979 cubic feet, and exhausting to the atmosphere.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-6.1-5(a)(1)]

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart DDDDDDD.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

and

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

E.1.2 Prepared Feeds Manufacturing NESHAP [40 CFR Part 63, Subpart DDDDDDD]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart DDDDDDD (included as Attachment A to the operating permit), for the emission unit(s) listed above:

(1) 40 CFR 63.11619(a), (b)(1), (c), (e);
(2) 40 CFR 63.11620(a);
(3) 40 CFR 63.11621(a), (b), (c), (d), (f);
(4) 40 CFR 63.11622(a), (b)(1), and (b)(3);
(5) 40 CFR 63.11623;
(6) 40 CFR 63.11624;
(7) 40 CFR 63.11625;
(8) 40 CFR 63.11626;
(9) 40 CFR 63.11627; and
(10) Table 1.

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

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Purina Animal Nutrition, LLC
Address:	2124 Lynch Rd.
City:	Evansville, Indiana 47711
Phone #:	812-424-5501
MSOP #:	M163-36601-00033

I hereby certify that Purina Animal Nutrition, LLC is :
- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that Purina Animal Nutrition, LLC is :
- ☐ in compliance with the requirements of MSOP M163-36601-00033.
- ☐ not in compliance with the requirements of MSOP M163-36601-00033.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____
_____

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

Purina Animal Nutrition, LLC
2124 Lynch Rd.
Evansville, Indiana 47711

Affidavit of Construction

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

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

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

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

4. I hereby certify that Purina Animal Nutrition, LLC 2124 Lynch Rd., Evansville, Indiana 47711, has constructed and will operate a nutrient block and animal feed manufacturing facility on _____in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on December 10, 2015 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M163-36601-00033, Plant ID No. 163-00033 issued on _____.

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

Further Affiant said not.

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

Signature_____
Date_____

STATE OF INDIANA)
)SS

COUNTY OF _____)

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

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

Signature_____
Name_____ (typed or printed)

Attachment A

Minor Source Operating Permit (MSOP) No: M163-36601-00033

Title 40: Protection of Environment

PART 63—National Emission Standards for Hazardous Air Pollutants for Source Categories

Subpart DDDDDDD—National Emission Standards for Hazardous Air Pollutants for Area Sources: Prepared Feeds Manufacturing

SOURCE: 75 FR 546, Jan. 5, 2010, unless otherwise noted.

Applicability and Compliance Dates

§ 63.11619 Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate a prepared feeds manufacturing facility that uses a material containing chromium or a material containing manganese and is an area source of emissions of hazardous air pollutants (HAP).

(b) The provisions of this subpart apply to each new and existing prepared feeds manufacturing affected source. A prepared feeds manufacturing affected source is the collection of all equipment and activities necessary to produce animal feed from the point in the process where a material containing chromium or a material containing manganese is added, to the point where the finished animal feed product leaves the facility. This includes, but is not limited to, areas where materials containing chromium and manganese are stored, areas where materials containing chromium and manganese are temporarily stored prior to addition to the feed at the mixer, mixing and grinding processes, pelleting and pellet cooling processes, packing and bagging processes, crumblers and screens, bulk loading operations, and all conveyors and other equipment that transfer the feed materials throughout the manufacturing facility.

(1) A prepared feeds manufacturing affected source is existing if you commenced construction or reconstruction of the facility on or before July 27, 2009.

(2) A prepared feeds manufacturing affected source is new if you commenced construction or reconstruction of the facility after July 27, 2009.

(3) A collection of equipment and activities necessary to produce animal feed at a prepared feeds manufacturing facility becomes an affected source when you commence using a material containing chromium or a material containing manganese.

(c) An affected source is no longer subject to this subpart if the facility stops using materials containing chromium or manganese.

(d) This subpart does not apply to the facilities identified in paragraphs (d)(1) and (2) of this section.

(1) Prepared feeds manufacturing facilities that do not add any materials containing chromium or manganese to any product manufactured at the facility.

(2) Research or laboratory facilities as defined in section 112(c)(7) of the Clean Air Act (CAA).

(e) You are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided you are not otherwise required by law to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart.

§ 63.11620 What are my compliance dates?

(a) If you own or operate an existing affected source, you must achieve compliance with the applicable provisions of this subpart by no later than January 5, 2012.

(b) If you own or operate a new affected source, you must achieve compliance with the applicable provisions of this subpart by January 5, 2010, or upon startup of your affected source, whichever is later.

(c) If you own or operate a facility that becomes an affected source in accordance with § 63.11619 after the applicable compliance date in paragraphs (a) or (b) of this section, you must achieve compliance with the applicable provisions of this subpart by the date that you commence using a material containing manganese or a material containing chromium.

(d) If the average daily feed production level exceeds 50 tons per day for a calendar year for a facility not complying with the requirement in § 63.11621(e) to install and operate a cyclone to control emissions from pelleting operations, you must comply with § 63.11621(e) and all associated requirements by July 1 of the year following the one-year period.

Standards, Monitoring, and Compliance Requirements

§ 63.11621 What are the standards for new and existing prepared feeds manufacturing facilities?

You must comply with the management practices and standards in paragraphs (a) through (d) of this section at all times. For pelleting operations at prepared feeds manufacturing facilities with an average daily feed production level exceeding 50 tons per day, you must also comply with the requirements in paragraph (e) of this section at all times if you are a new source, and if you are an existing source, you must also comply with the requirements in paragraph (f) of this section at all times.

(a) In all areas of the affected source where materials containing chromium or manganese are stored, used, or handled, you must comply with the management practices in paragraphs (a)(1) and (2) of this section.

(1) You must perform housekeeping measures to minimize excess dust. These measures must include, but not be limited to, the practices specified in paragraphs (a)(1)(i) through (iii) of this section.

(i) You must use either an industrial vacuum system or manual sweeping to reduce the amount of dust;

(ii) At least once per month, you must remove dust from walls, ledges, and equipment using low pressure air or by other means, and then sweep or vacuum the area;

(iii) You must keep exterior doors in the immediate affected areas shut except during normal ingress and egress, as practicable. This paragraph (a)(1)(iii) does not apply to areas where finished product is stored in closed containers, and no other materials containing chromium or manganese are present.

(2) You must maintain and operate all process equipment in accordance with manufacturer's specifications and in a manner to minimize dust creation.

(b) You must store any raw materials containing chromium or manganese in closed containers.

(c) The mixer where materials containing chromium or manganese are added must be covered at all times when mixing is occurring, except when the materials are being added to the mixer. Materials containing chromium or manganese must be added to the mixer in a manner that minimizes emissions.

(d) For the bulk loading process where materials containing chromium or manganese are loaded into trucks or railcars, you must lessen fugitive emissions by reducing the distance between the loadout spout and the vehicle being loaded by either paragraph (d)(1) or (d)(2) of this section.

(1) Use a device of any kind at the bulk loadout spout that minimizes the distance to the vehicle being loaded.

(2) Use any other means to minimize the distance between the loadout spout and the vehicle being loaded.

(e) For the pelleting operations at new prepared feeds manufacturing facilities with an average daily feed production level exceeding 50 tons per day, you must capture emissions and route them to a cyclone designed to reduce emissions of particulate matter by 95 percent or greater. You must also comply with the provisions in paragraphs (e)(1) through (3) of this section.

(1) You must demonstrate that the cyclone is designed to reduce emissions of particulate matter by 95 percent or greater using one of the methods specified in paragraphs (e)(1)(i) through (iii) of this section.

(i) Manufacturer specifications;

(ii) Certification by a professional engineer or responsible official; or

(iii) A performance test conducted in accordance with § 63.11623 of this section.

(2) You must establish an inlet flow rate, inlet velocity, pressure drop, or fan amperage range that represents proper operation of the cyclone in accordance with the applicable requirement in paragraphs (e)(2)(i), (ii), or (iii) of this section.

(i) If you demonstrate the cyclone design efficiency using manufacturer specifications in accordance with paragraph (e)(1)(i) of this section, the inlet flow rate, inlet velocity, pressure drop, or fan amperage range that represents proper operation of the cyclone must be provided by the manufacturer.

(ii) If you demonstrate the cyclone design efficiency using certification by a professional engineer or responsible official in accordance with paragraph (e)(1)(ii) of this section, this certification must include calculations to establish an inlet flow rate, inlet velocity, pressure drop, or fan amperage range that represents proper operation of the cyclone.

(iii) If you demonstrate the cyclone design efficiency using a performance test in accordance with paragraph (e)(1)(iii) of this section, you must monitor the inlet flow rate, inlet velocity, pressure drop, or fan amperage during the test and establish a range that represents proper operation of the cyclone based on the data obtained during the test.

(3) You must maintain and operate the cyclone in accordance with manufacturer's specifications. If manufacturer's specifications are not available, you must develop and follow standard maintenance and operating procedures that ensure proper operation of the cyclone.

(f) For the pelleting operations at existing prepared feeds manufacturing facilities with an average daily feed production level exceeding 50 tons per day, you must capture emissions and route them to a cyclone. The cyclone must be maintained in accordance with good air pollution control practices and manufacturer's specifications and operating instructions, if available. If manufacturer's specifications and

operating instructions are not available, you must develop and follow standard operating procedures that ensure proper operation and maintenance of the cyclone.

[75 FR 546, Jan. 5, 2010, as amended at 76 FR 80265, Dec. 23, 2011]

§ 63.11622 What are the monitoring requirements for new and existing sources?

(a) If you own or operate an affected source required by § 63.11621(d) to use a device at the loadout end of a bulk loader that reduces fugitive emissions from a bulk loading process, you must perform monthly inspections of each device to ensure it is in proper working condition. You must record the results of these inspections in accordance with § 63.11624(c)(4) of this subpart.

(b) If you own or operate an affected source required by § 63.11621(e) or (f) to install and operate a cyclone to control emissions from pelleting operations, you must comply with the inspection and monitoring requirements in paragraphs (b)(1) and either (b)(2) or (b)(3) of this section, as applicable.

(1) You must perform quarterly inspections of the cyclone for corrosion, erosion, or any other damage that could result in air in-leakage, and record the results in accordance with § 63.11624(c).

(2) If you own or operate a new source, you must monitor inlet flow rate, inlet velocity, pressure drop, or fan amperage at least once per day when the pelleting process is in operation. You must also record the inlet flow rate, inlet velocity, pressure drop, or fan amperage in accordance with § 63.11624(c)(4).

(3) If you own or operate an existing source, you must perform a weekly visual inspection of the operating cyclone to ensure it is operating consistent with good air pollution control practices.

[75 FR 546, Jan. 5, 2010, as amended at 76 FR 80265, Dec. 23, 2011]

§ 63.11623 What are the testing requirements?

(a) If you are demonstrating that the cyclone required by § 63.11621(e) is designed to reduce emissions of particulate matter by 95 percent or greater by the performance test option in § 63.11621(e)(1)(iii), you must conduct a test in accordance with paragraph (b) of this section and calculate the percent reduction in accordance with paragraph (c) of this section.

(b) You must use Method 5 in Appendix A to part 60 to determine the particulate matter mass rate at the inlet and outlet of the cyclone. You must conduct at least three runs at the cyclone inlet and three runs at the cyclone outlet. Each run must have a sampling time of at least 60 minutes and a sample volume of at least 0.85 dscm (30 dscf).

(c) You must calculate the percent particulate matter reduction using Equation 1.

$$PM\ RED = \left(\frac{M_{INLET} - M_{OUTLET}}{M_{INLET}} \right) x100 \qquad \text{Equation 1}$$

Where:

PM RED = particulate matter reduction, percent;

M_{INLET} = Mass of particulate matter at the inlet of the cyclone, dry basis, corrected to standard conditions, g/min;

M_{OUTLET} = Mass of particulate matter at the outlet of the cyclone, dry basis, corrected to standard conditions, g/min;

§ 63.11624 What are the notification, reporting, and recordkeeping requirements?

(a) *Notifications.* You must submit the notifications identified in paragraphs (a)(1) and (2) of this section.

(1) *Initial Notification.* If you are the owner of an affected source you must submit an Initial Notification no later than May 5, 2010, or 120 days after you become subject to this subpart, whichever is later. The Initial Notification must include the information specified in paragraphs (a)(1)(i) through (iv) of this section.

(i) The name, address, phone number and e-mail address of the owner and operator;

(ii) The address (physical location) of the affected source;

(iii) An identification of the relevant standard (*i.e.,* this subpart); and

(iv) A brief description of the operation.

(2) *Notification of Compliance Status.* If you are the owner of an existing affected source, you must submit a Notification of Compliance Status in accordance with § 63.9(h) of the General Provisions on or before May 4, 2012. If you are the owner or operator of a new affected source, you must submit a Notification of Compliance Status within 120 days of initial startup, or by October 18, 2010, whichever is later. If you own or operate an affected source that becomes an affected source in accordance with § 63.11619(b)(3) after the applicable compliance date in § 63.11620 (a) or (b), you must submit a Notification of Compliance Status within 120 days of the date that you commence using materials containing manganese or chromium. This Notification of Compliance Status must include the information specified in paragraphs (a)(2)(i) through (iv) of this section.

(i) Your company's name and address;

(ii) A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart;

(iii) If you own or operate a new source required by § 63.11621(e) to install and operate a cyclone to control emissions from pelleting operations, the inlet flow rate, inlet velocity, pressure drop, or fan amperage range than constitutes proper operation of the cyclone determined in accordance with § 63.11621(e)(2).

(iv) If you own or operate an existing source required by § 63.11621(f) to install and operate a cyclone to control emissions from pelleting operations, documentation of what constitutes proper operation of the cyclone determined in accordance with § 63.11621(f).

(v) If you own or operate an affected source that is not subject to a requirement in § 63.11621(e) or (f) to install and operate a cyclone to control emissions from pelleting operations because your initial average daily feed production level was 50 tpd or less, documentation of your initial daily pelleting production level determination.

(b) *Annual compliance certification report.* You must, by March 1 of each year, prepare an annual compliance certification report for the previous calendar year containing the information specified in paragraphs (b)(1) through (b)(6) of this section. You must submit the report if you had any instance described by paragraph (b)(3) or (b)(4) of this section.

(1) Your company's name and address.

(2) A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart.

(3) If the source is not in compliance, include a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken.

(4) If you own or operate a new source that is subject to § 63.11621(e), you must identify all instances when the daily inlet flow rate, inlet velocity, pressure drop, or fan amperage is outside the range that constitutes proper operation of the cyclone submitted as part of your Notification of Compliance Status. In these instances, include the time periods when this occurred and the corrective actions taken.

(5) If you own or operate an existing source that is subject to § 63.11621(f), you must identify all instances when the cyclone was not operating properly as determined in accordance with § 63.11621(f).

(6) If you own or operate an affected source that is not subject to a requirement in § 63.11621(e) or (f) to install and operate a cyclone to control emissions from pelleting operations because your average daily feed production level was 50 tpd or less, notification if your average daily feed production level for the previous year exceeded 50 tpd.

(7) If you own or operate an affected source that was subject to a requirement in § 63.11621(e) or (f) to install and operate a cyclone to control emissions from pelleting operations, notification if your average daily feed production level for the previous year was 50 tpd or less and that you are no longer complying with § 63.11621(e) or (f).

(c) *Records.* You must maintain the records specified in paragraphs (c)(1) through (6) of this section in accordance with paragraphs (c)(7) through (9) of this section.

(1) As required in § 63.10(b)(2)(xiv), you must keep a copy of each notification that you submitted to comply with this subpart in accordance with paragraph (a) of this section, and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.

(2) You must keep a copy of each Annual Compliance Certification prepared in accordance with paragraph (b) of this section.

(3) For each device used to comply with the requirements in § 63.11621(d), you must keep the records of all inspections including the information identified in paragraphs (c)(3)(i) through (iii) of this section.

(i) The date, place, and time of each inspection;

(ii) Person performing the inspection;

(iii) Results of the inspection, including the date, time, and duration of the corrective action period from the time the inspection indicated a problem to the time of the indication that the device was replaced or restored to operation.

(4) If you own or operate a new source that is subject to § 63.11621(e), you must keep the records in paragraphs (c)(4)(i) through (v) of this section.

(i) If you demonstrate that the cyclone is designed to reduce emission of particulate matter by 95 percent or greater by manufacturer's specifications in accordance with § 63.11621(e)(1(i), you must keep the records specified in paragraphs (c)(4)(i)(A) through (C) of this section.

(A) Information from the manufacturer regarding the design efficiency of the cyclone,

(B) The inlet flow rate, inlet velocity, pressure drop, or fan amperage range that represents proper operation of the cyclone,

(C) The operation and maintenance procedures to ensure proper operation of the cyclone.

(ii) If you demonstrate that the cyclone is designed to reduce emissions of particulate matter by 95 percent or greater by certification by a professional engineer in accordance with paragraph § 63.11621(e)(1)(ii), you must keep the records specified in paragraphs (c)(4)(ii)(A) through (C) of this section.

(A) Certification regarding the design efficiency of the cyclone, along with supporting information,

(B) The inlet flow rate, inlet velocity, pressure drop, or fan amperage range that represents proper operation of the cyclone,

(C) The standard maintenance and operating procedures that ensure proper operation of the cyclone.

(iii) If you demonstrate that the cyclone is designed to reduce emissions of particulate matter by 95 percent or greater by a performance in accordance with paragraph § 63.11621(e)(1)(iii), you must keep the records specified in paragraphs (c)(4)(iii)(A) through (C) of this section.

(A) Results of the testing conducted in accordance with § 63.11623,

(B) The inlet flow rate, inlet velocity, pressure drop, or fan amperage range that represents proper operation of the cyclone,

(C) The standard maintenance and operating procedures that ensure proper operation of the cyclone.

(iv) Records of all quarterly inspections including the information identified in paragraphs (c)(4)(iv)(A) through (C) of this section.

(A) The date, place, and time of each inspection;

(B) Person performing the inspection;

(C) Results of the inspection, including the date, time, and duration of the corrective action period from the time the inspection indicated a problem to the time of the indication that the cyclone was restored to proper operation.

(v) Records of the daily inlet flow rate, inlet velocity, pressure drop, or fan amperage measurements, along with the date, time, and duration of the correction action period from the time the monitoring indicated a problem to the time of the indication that the cyclone was restored to proper operation.

(5) If you own or operate an existing source that is subject to § 63.11621(f), you must keep the records in paragraphs (c)(5)(i) and (ii) of this section.

(i) Records of all quarterly inspections including the information identified in paragraphs (c)(5)(i)(A) through (C) of this section.

(A) The date, place, and time of each inspection;

(B) Person performing the inspection;

(C) Results of the inspection, including the date, time, and duration of the corrective action period from the time the inspection indicated a problem to the time of the indication that the cyclone was restored to proper operation.

(ii) Records of weekly visual inspections of the operating cyclone, including a record of any corrective action taken as a result of the inspection.

(6) If you own or operate an affected source that is not subject to a requirement in § 63.11621(e) or (f) to install and operate a cyclone to control emissions from pelleting operations because your average daily feed production level is 50 tpd or less, feed production records to enable the determination of the average daily feed production level.

(7) Your records must be in a form suitable and readily available for expeditious review, according to § 63.10(b)(1).

(8) As specified in § 63.10(b)(1), you must keep each record for 5 years following the date of each recorded action.

(9) You must keep each record onsite for at least 2 years after the date of each recorded action according to § 63.10(b)(1). You may keep the records offsite for the remaining 3 years.

(d) If you no longer use materials that contain manganese or chromium after January 5, 2010, you must submit a Notification in accordance with § 63.11619(c) which includes the information specified in paragraphs (d)(1) and (2) of this section.

(1) Your company's name and address;

(2) A statement by a responsible official indicating that the facility no longer uses materials that contain chromium or manganese. This statement should also include an effective date for the termination of use of materials that contain chromium or manganese, and the responsible official's name, title, phone number, e-mail address and signature.

[75 FR 546, Jan. 5, 2010, as amended at 75 FR 41994, July 20, 2010; 76 FR 80266, Dec. 23, 2011]

Other Requirements and Information

§ 63.11625 What parts of the General Provisions apply to my facility?

Table 1 of this subpart shows which parts of the General Provisions in §§ 63.1 through 63.16 apply to you.

§ 63.11626 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by EPA or a delegated authority such as your State, local, or Tribal agency. If the EPA Administrator has delegated authority to your State, local, or Tribal agency, then that agency has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or Tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or Tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are retained by the EPA Administrator and are not transferred to the State, local, or Tribal agency.

(c) The authorities that cannot be delegated to State, local, or Tribal agencies are specified in paragraphs (c)(1) through (5) of this section.

(1) Approval of an alternative nonopacity emissions standard under § 63.6(g).

(2) Approval of an alternative opacity emissions standard under § 63.6(h)(9).

(3) Approval of a major change to test methods under § 63.7(e)(2)(ii) and (f). A “major change to test method” is defined in § 63.90.

(4) Approval of a major change to monitoring under § 63.8(f). A “major change to monitoring” is defined in § 63.90.

(5) Approval of a major change to recordkeeping and reporting under § 63.10(f). A “major change to recordkeeping/reporting” is defined in § 63.90.

§ 63.11627 What definitions apply to this subpart?

Terms used in this subpart are defined in the CAA, in § 63.2, and in this section.

Animal feed includes: Dehydrated alfalfa meal; alfalfa prepared as feed for animals; cubed alfalfa; prepared animal feed; chopped, crushed, or ground barley feed; prepared bird feed; blended animal feed; bone meal prepared as feed for animals and fowls; cattle feeds, supplements, concentrates, and premixes; prepared chicken feeds; cattle feed citrus pulp; complete livestock feed; custom milled animal feed; dairy cattle feeds supplements, concentrates, and premixes; earthworm food and bedding; animal feed concentrates; animal feed premixes; animal feed supplements; prepared animal feeds; specialty animal (*e.g.,* guinea pig, mice, mink) feeds; fish food for feeding fish; custom ground grains for animal feed; cubed hay; kelp meal and pellets animal feed; laboratory animal feed; livestock feeds, supplements, concentrates and premixes; alfalfa meal; bone meal prepared as feed for animals and fowls; livestock micro and macro premixes; mineral feed supplements; animal mineral supplements; pet food; poultry feeds, supplements, and concentrates; rabbit food; shell crushed and ground animal feed; swine feed; swine feed supplements, concentrates, and premixes; and prepared turkey feeds. Feed products produced for dogs and cats are not considered animal feed for the purposes of this subpart.

Average daily feed production level means the average amount of animal feed products produced each day over an annual period. The initial determination of the average daily feed production level is based on the one-year period prior to the compliance date for existing sources, or the design rate for new sources. The subsequent average daily feed production levels are determined annually and are based on the amount of animal feed products produced in a calendar year divided by the number of days in which the production processes were in operation.

Cyclone means a mechanically aided collector that uses inertia to separate particulate matter from the gas stream as it spirals through the cyclone.

Material containing chromium means a material that contains chromium (Cr, atomic number 24) in amounts greater than or equal to 0.1 percent by weight.

Material containing manganese means a material that contains manganese (Mn, atomic number 25) in amounts greater than or equal to 1.0 percent by weight.

Pelleting operations means all operations that make pelleted animal feed, including but not limited to, steam conditioning, die-casting, drying, cooling, and crumbling, and granulation.

Prepared feeds manufacturing facility means a facility that is primarily engaged in manufacturing animal feed. A facility is primarily engaged in manufacturing animal feed if the production of animal feed comprises greater than 50 percent of the total production of the facility on an annual basis. Facilities primarily engaged in raising or feeding animals are not prepared feed manufacturing facilities. Facilities engaged in the growing of agricultural crops that are used in the manufacturing of feed are not considered prepared feeds manufacturing facilities.

§§ 63.11628-63.11638 [Reserved]

Table 1 to Subpart DDDDDDD of Part 63—Applicability of General Provisions to Prepared Feeds Manufacturing Area Sources

As required in § 63.11619, you must meet each requirement in the following table that applies to you.

Citation	**Subject**	**Applies to Subpart DDDDDDD?**
63.1	Applicability	Yes.
63.2	Definitions	Yes.
63.3	Units and Abbreviations	Yes.
63.4	Prohibited Activities and Circumvention	Yes.
63.5	Preconstruction Review and Notification Requirements	No.
63.6(a),(b)(1)-(b)(5), (b)(7), (c), (f)(2)-(3), (g), (i), and (j)	Compliance with Standards and Maintenance Requirements	Yes.
63.6(e)(1), (e)(3), (f)(1), and (h)	Startup, shutdown, and malfunction requirements and opacity/visible emission standards	No. Standards apply at all times, including during startup, shutdown, and malfunction events.
63.7	Performance Testing Requirements	Yes.
63.8	Monitoring Requirements	Yes.
63.9(a), (b), (c), (d), (h), (i), and (j)	Notification Requirements	Yes.
63.9(e), (f), (g)		No.
63.10(a),(b)(1), (b)(2)(i)-(iii), (b)(2)(vi)-(xiv), (c), (d)(1), (e), and (f)	Recordkeeping and Reporting Requirements	Yes.
63.10(b)(2)(iv)-(v), (b)(3), and (d)(2)-(5)	Recordkeeping and Reporting Requirements	No.
63.11	Control Device Requirements	No.
63.12	State Authorities and Delegations	Yes.
63.13	Addresses	Yes.
63.14	Incorporations by Reference	Yes.

63.15	Availability of Information and Confidentiality	Yes.
63.16	Performance Track Provisions	Yes.
63.1(a)(5), (a)(7)-(9), (b)(2), (c)(3)-(4), (d), 63.6(b)(6), (c)(3), (c)(4), (d), (e)(2), (e)(3)(ii), (h)(3), (h)(5)(iv), 63.8(a)(3), 63.9(b)(3), (h)(4), 63.10(c)(2)-(4), (c)(9)	Reserved	No.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Permit by Rule Transitioning to a Minor Source Operating Permit (MSOP) with New Source Review (NSR)

Source Description and Location

Source Name:	**Purina Animal Nutrition, LLC**
Source Location:	**2124 Lynch Rd., Evansville, IN 47711**
County:	**Vanderburgh**
SIC Code:	**2048 (Prepared Feed and Feed Ingredients for Animals and Fowls, Except Dogs and Cats)**
Operation Permit No.:	**M163-36601-00033**
Permit Reviewer:	**Adam Wheat**

On December 10, 2015, the Office of Air Quality (OAQ) received an application from Purina Animal Nutrition, LLC related to the transition of a Permit by Rule to a MSOP for its stationary nutrient block and animal feed manufacturing facility.

Existing Approvals

The source has been operating under Permit by Rule No. PBR163-22041-00033, issued on November 30, 2005.

Due to this application, the source is transitioning from a Permit by Rule to a MSOP.

County Attainment Status

The source is located in Vanderburgh 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]
$PM_{2.5}$	Attainment effective October 27, 2011, 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]Attainment effective October 18, 2000, for the 1-hour ozone standard for the Evansville area, including Vanderburgh County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Vanderburgh 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) $PM_{2.5}$

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

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

Fugitive Emissions

(a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

(b) 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.

Note: Although the New Source Performance Standard (NSPS) for Grain Elevators (40 CFR 60, Subpart DD) was promulgated on or before August 7, 1980, this facility does not fall within the "listed source category" for Subpart DD, since this source does not meet the definition of a "grain terminal elevator", as defined under 40 CFR 60.301(c), or a "grain storage elevator", as defined under 40 CFR 60.301(f). This source does not meet the definition of a "grain terminal elevator", as defined under 40 CFR 60.301(c), since it does not have a permanent storage capacity of more than 2.5 million U.S. bushels. This source does not meet the definition of a "grain storage elevator", as defined under 40 CFR 60.301(f), since it is not a wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean oil extraction plant which has a permanent grain storage capacity of 1 million bushels.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Purina Animal Nutrition, LLC on December 10, 2015, relating to the transition from a Permit by Rule (PBR) to Minor Source Operating Permit (MSOP) for its stationary nutrient block and animal feed manufacturing facility. The source no longer qualifies for a PBR for Grain processing or milling (326 IAC 2-11-4), since the primary operation at the source is nutrient block manufacturing, not animal feed milling.

The source consists of the following permitted emission units:

(a) One (1) grain receiving area, identified as Receiving-1, constructed in 1971, with a maximum capacity of 25 tons of grain per hour, using no control device, and exhausting fugitively outdoors.

(b) One (1) truck receiving area, identified as Receiving-2, constructed in 1971, with a maximum capacity of 25 tons of grain or minerals per hour, using no control device, and exhausting fugitively outdoors.

(c) One (1) bin loading and grain handling operation, identified as Handling-1, constructed in 1971, with a maximum capacity of 50 tons per hour, using no control device, and exhausting outdoors.

(d) One (1) hammermill, identified as HM-1, constructed in 1971, with a maximum throughput of 3.0 tons per hour of grain, using a cyclone as control, identified as Hammermill Cyclone #2, and exhausting to stack #2.

(e) One (1) grain cracker, identified as GC-1, constructed in 2014, with a maximum capacity of 1.50 tons per hour of grain, using no controls, and exhausting indoors.

(f) One (1) mixing operation, identified as Mixer-1, constructed in 1971, with a maximum capacity of 18 tons per hour of grain, with the mixer covered during the addition and mixing of materials, using no controls, and exhausting into a surge hopper.

(g) One (1) micro room, identified as Micro-1, constructed in 1975, with a maximum capacity of 0.25 tons per hour of micro ingredients, using a baghouse for control, identified as Micro Filter #4, and exhausting to stack #4.

(h) One (1) pelleting operation including two (2) pellet mills, identified as CPM-1 and CPM-2, and one (1) pellet cooler, identified as CPM cooler, each constructed in 1982, with a combined maximum throughput of 10 tons per hour, using a cyclone for controls, identified as Pellet Cyclone #1, and exhausting through stack #1.

(i) One (1) bulk loadout operation, identified as Loadout-1, constructed in 1971, with a maximum throughput of 25 tons per hour, using no controls, and exhausting fugitively outdoors.

(j) One (1) packing operation, identified as Packing-1, constructed in 1971, with a maximum throughput of 10 tons per hour, using a cyclone and baghouse for controls, identified as Packer Filter #3, and exhausting to the indoors.

(k) Fifteen (15) grain storage bins, with a combined maximum capacity of 60,417 cubic feet, and exhausting to the atmosphere.

(l) Fourteen (14) mineral storage bins, with a combined maximum capacity of 29,979 cubic feet, and exhausting to the atmosphere.

(m) One (1) natural gas-fired boiler, identified as B-1, constructed in 1971, with a maximum heat input capacity of 6.277 MMBtu/hr, with no controls, and exhausting to stack BR.

(n) Paved and unpaved roads.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

(a) Two (2) block mixing operations, identified as Mixer-2 and Mixer-3, constructed in 1975 and 2014 respectively, with a maximum throughput of 2.0 tons per hour each, with the mixers covered during the addition and mixing of materials, using no controls, and exhausting into a surge hopper.

(b) Two (2) block presses, identified as block line 1 and 2, constructed in 1975 and 2014 respectively, with a maximum throughput of 2.0 tons per hour each, using no controls, and exhausting indoors.

"Integral Part of the Process" Determination

(a) The applicant has submitted information to justify why the pellet cooler cyclone (Pellet Cyclone #1) should be considered an integral part of the pelleting operation. A summary of the information submitted in the justification, assuming 5,200 actual hours of operation per year, is provided below:

(1) The primary purpose of the pellet cooler cyclone is to separate pellet fines from the hot/moisture-laden pellet cooler aspiration system air, thereby helping to reduce heat and moisture in the feed pellets immediately after they are manufactured in the pellet mill. The heated aspiration system air picks up moisture and fines from the pellet beds and is sent to a cyclone for fines removal. The fines are then returned to the process for reuse. Pellet coolers have been used in the feed manufacturing industry since the 1950's, prior to modern air pollution control rules. Based on FDA and OSHA rules, the pellet cyclone is also necessary to reduce workplace dust and to minimize the explosion hazard of combustible particulate in the air from the pellet cooling operation.

(2) A secondary purpose for the use of the pellet cyclone is economic value of recovered fines. The dollar amount saved from the collected material by this equipment is much more than the annual capital and operating costs of the cyclone. A price quotation submitted by the applicant estimates the average price for pelleted feed at Purina Animal Nutrition, LLC is $500 per ton. Five (5) recent Method 5 stack tests have shown the "captured particulates" in the pellet cooler range between 9.31 and 151.68 pounds per hour of particulate, with 50.36 pounds per hour as the average amount collected. The unit operates 5,200 hours a year, which results in an average cost savings of recovered fines of $65,468 per year (50.36 lbs/hr * 5200 hrs/yr * $500/ton * ton/2000 lbs). The estimated cost to replace the pellet cooler cyclone at Purina Animal Nutrition, LLC would be between $25,000 and $30,000. Since the cyclone has operated for 33 years, the annualized cost of the cyclone would be $909 per year ($30,000/33 years). The source estimates an average of $200 a month for repair and maintenance, which makes the total annualized cost of the pellet cooler cyclone $1,109 per year. Thus, the cost savings due to operating the pellet cooler cyclone is $64,359 per year ($65,468 - $1,109). The savings associated with the fines recovered from the pellet cooler has an overwhelming positive net economic effect.

(3) Finally, a November 14, 1995, EPA memorandum, titled “Calculating PTE and other Guidance for Grain Handling Facilities” states that pellet cooling cyclones are inherent to the process and can be taken into account when calculating PTE. Hence, the potential to emit from the pellet cooler should be calculated after the controls.

This EPA memorandum can be found on the internet at:
https://www.epa.gov/sites/production/files/2015-08/documents/grainfnl.pdf

The EPA memo states:
“Control measures that are "inherent" are those which are always operated and maintained for reasons other than community air quality protection. Examples of inherent control measures include (a) product collection devices for which the value of the product collected greatly exceeds the cost of the collection device, and (b) devices for which the primary purpose is to improve product quality control, to recover product, or to enhance production operating efficiency (for example, product recovery cyclones associated with operations such as pellet coolers at feed mills.)”

IDEM, OAQ has evaluated the information submitted and agrees that the pellet cooler cyclone (Pellet Cyclone #1) should be considered an integral part of the pelleting operation. This determination is based on the fact that the cyclone serves a primary purpose other than air pollution control (primarily used to separate pellet fines from the hot/moisture-laden pellet cooler aspiration system air, thereby helping to reduce heat and moisture in the feed pellets), and the 1995 EPA memorandum indicates that pellet cooler cyclones can be considered as inherent control measures. Therefore, potential emissions for particulate matter will be calculated after the pellet cooler cyclone for purposes of determining operating permit level and for determining the applicability of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)). Operating conditions in the proposed permit will specify that pellet cooler cyclone (Pellet Cyclone #1) shall operate at all times when the pelleting operation is in operation.

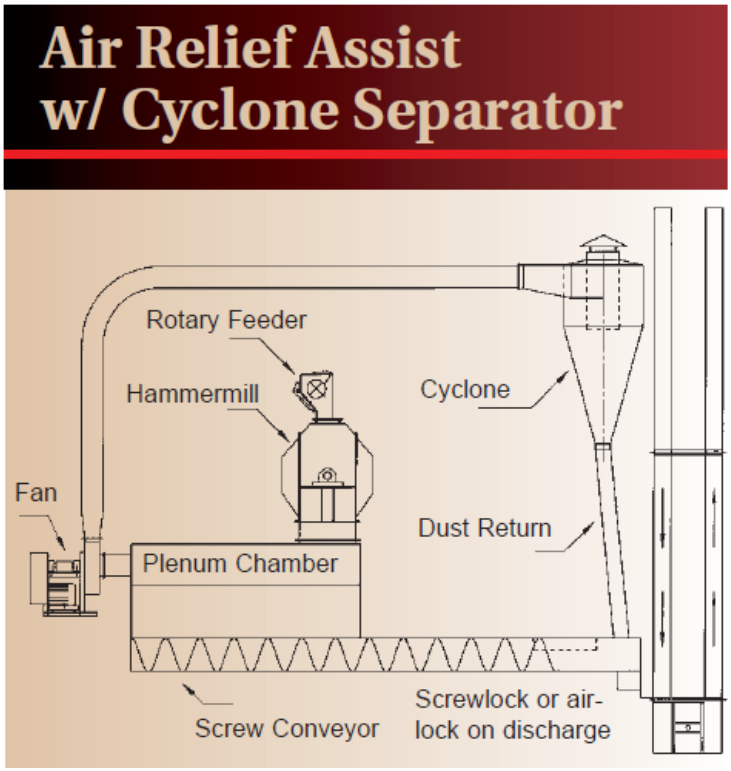
(b) The applicant has submitted information to justify why the hammermill cyclone (Hammermill Cyclone #2) should be considered an integral part of the hammermill operation. A summary of the information submitted in the justification, assuming 5,200 actual hours of operation per year, is provided below:

(1) The primary purpose of the hammermill cyclone is to remove corn fines from the hammermill aspiration system air. The hammermill is an air-relief assist system with a cyclone separator (see Figure 1 below). The Evansville hammermill is used to grind corn

into smaller particle size. Aspiration air is used to improve hammermill efficiency and performance, to reduce buildup of ground corn in the hammermill grinding chamber, to reduce heat buildup in the hammermill grinding chamber, and to reduce excessive wear of the hammermills and screens. Air assist systems are designed to provide reduced pressure on the exit side of the hammermill screen to disrupt the fluidized bed of material on the face of the screen, thus allowing particles to exit from the grinding chamber through the screen perforations. A properly designed air assist system allows a hammermill to produce a more uniform finished product with less heating and also controls dusting in the mill. Air assist grinding systems often will out produce non-assisted systems by 15 to 40%. Once air is passed through the hammermill, the entrained fines are settled out in a plenum chamber before the air is sent along to the cyclone. To accomplish this, a plenum chamber is provided between the conveyor and pickup point. The plenum chamber is designed so the air velocity drops below 350 to 480 ft per minute. Settled particles from the plenum chamber are carried back into the product stream. The air stream is then sent to the cyclone for removal of particles that were not settled out in the plenum chamber, with the collected particles combined with the product stream.

Based on FDA and OSHA rules, the hammermill cyclone is also necessary to reduce workplace dust and to minimize the explosion hazard of combustible particulate in the air from the hammermill operation.

Figure 1: Hammermill Process



Drawing Source: Bliss Industries Inc.

(2) A secondary purpose for the use of the hammermill cyclone is economic value of recovered fines. The dollar amount saved from the collected material by this equipment is more than the annual capital cost of the cyclone. A price quotation submitted by the applicant estimates the replacement value of grain at $242 per ton. Using the AP-42 emission factor (0.067 lbs of PM per ton of product for hammermilling, after controls), and back calculating the uncontrolled particulate emissions, assuming 85% control efficiency of the cyclone, and 5,200 hours of operation, 2.96 tons per year of corn fines are

collected by the cyclone (0.067 lbs/ton * 3.0 ton/hr * 85%/(100% - 85%) * 5,200 hours/yr * ton/2000 lbs). The value of the 2.96 tons of corn fines that could be collected in cyclone is $716.32 per year (2.96 tons/yr * $242 per ton). The annualized cost of the cyclone is $372. Thus, the cost savings due to operating the control is $344.32 per year ($716.32 - $372).

IDEM, OAQ has evaluated the information submitted and has determined that the hammermill cyclone (Hammermill Cyclone #2) is not an integral part of the hammermill operation (Corn Grinder), since cyclone is primary by the Permittee for dust (particulate air pollution) control. IDEM, OAQ considers the use of the cyclone to remove corn fines from the hammermill aspiration system air, to comply with FDA and OSHA rules for workplace dust, and to minimize explosion hazards as reasons that are equivalent to pollution control. Although the hammer cyclone collects corn fines, the overall cost savings from operating the hammer cyclone does not provide an overwhelming positive net economic effect. Therefore, potential emissions for particulate matter will be calculated before the hammermill cyclone for purposes of determining operating permit level and for determining the applicability of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

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 permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

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

Pollutant	Potential To Emit (tons/year)
PM	36.67
PM10[(1)]	16.48
PM2.5	9.14
SO_2	0.02
NO_x	2.70
VOC	0.15
CO	2.26

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Manganese	0.14
All other HAPs	0.05
TOTAL HAPs	**0.19**

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.

(b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971 (326 IAC 12), are not included in the permit, because the natural gas-fired boiler (B-1) has a maximum heat input capacity of less than two hundred fifty (250) million British thermal units per hour.

(b) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart Da, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 (326 IAC 12), are not included in the permit, because the natural gas-fired boiler (B-1) is not an electric utility steam generating unit.

(c) The natural gas-fired boiler is not subject to the New Source Performance Standard for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Db, because the natural gas-fired boiler (B-1) has a heat input of less than 100 million British thermal units per hour.

(d) The natural gas-fired boiler is not subject to 40 CFR 60.40c, Subpart Dc, New Source Performance Standards - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12), because the natural gas-fired boiler (B-1) has a design heat input capacity of less than 10.0 million Btu per hour.

(e) The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60, Subpart DD, are not included in this permit, since this source does not meet the definition of a "grain terminal elevator", as defined under 40 CFR 60.301(c), or a "grain storage elevator", as defined under 40 CFR 60.301(f). This source does not meet the definition of a "grain terminal elevator", as defined under 40 CFR 60.301(c), since it does not have a permanent storage capacity of more than 2.5 million U.S. bushels. This source does not meet the definition of a "grain storage elevator", as defined under 40 CFR 60.301(f), since it is not a wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean oil extraction plant which has a permanent grain storage capacity of 1 million bushels.

(f) The requirements of the New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJ (326 IAC 12), are not included in the permit, because the natural gas-fired boiler (B-1) is not a reciprocating internal combustion engine.

(g) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(h) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart

DDDDD (326 IAC 20-95) are not included in the permit, because this source is not a major source of HAPs.

(i) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included in the permit, since the natural gas-fired boiler (B-1) is considered a gas-fired boiler, as defined by 40 CFR 63.11237, which is specifically exempted from this rule under 40 CFR 63.11195(e).

(j) The feed mill process is subject to the National Emission Standards for Hazardous Air Pollutants for Area Sources: Prepared Feeds Manufacturing, 40 CFR 63, Subpart DDDDDDD, because it is considered a prepared feeds manufacturing facilty as defined by 40 CFR 63.11627. The compliance date for this source is January 5, 2012. The units subject to this rule include the following:

(1) One (1) truck receiving area, identified as Receiving-2, constructed in 1971, with a maximum capacity of 25 tons of grain or minerals per hour, using no control device, and exhausting fugitively outdoors.

(2) One (1) bin loading and grain handling operation, identified as Handling-1, constructed in 1971, with a maximum capacity of 50 tons per hour, using no control device, and exhausting outdoors.

(3) One (1) mixing operation, identified as Mixer-1, constructed in 1971, with a maximum capacity of 18 tons per hour of grain, with the mixer covered during the addition and mixing of materials, using no controls, and exhausting into a surge hopper.

(4) One (1) micro room, identified as Micro-1, constructed in 1975, with a maximum capacity of 0.25 tons per hour of micro ingredients, using a baghouse for control, identified as Micro Filter #4, and exhausting to stack #4.

(5) One (1) pelleting operation including two (2) pellet mills, identified as CPM-1 and CPM-2, and one (1) pellet cooler, identified as CPM cooler, each constructed in 1982, with a combined maximum throughput of 10 tons per hour, using a cyclone for controls, identified as Pellet Cyclone #1, and exhausting through stack #1.

(6) One (1) bulk loadout operation, identified as Loadout-1, constructed in 1971, with a maximum throughput of 25 tons per hour, using no controls, and exhausting fugitively outdoors.

(7) One (1) packing operation, identified as Packing-1, constructed in 1971, with a maximum throughput of 10 tons per hour, using a cyclone and baghouse for controls, identified as Packer Filter #3, and exhausting to the indoors.

(8) Two (2) block mixing operations, identified as Mixer-2 and Mixer-3, constructed in 1975 and 2014 respectively, with a maximum throughput of 2.0 tons per hour each, with the mixers covered during the addition and mixing of materials, using no controls, and exhausting into a surge hopper.

(9) Two (2) block presses, identified as block line 1 and 2, constructed in 1975 and 2014 respectively, with a maximum throughput of 2.0 tons per hour each, using no controls, and exhausting indoors.

(10) Fourteen (14) mineral storage bins, with a combined maximum capacity of 29,979 cubic feet, and exhausting to the atmosphere.

Non applicable portions of the NESHAP will not be included in the permit. The pellet process is subject to the following portions of Subpart DDDDDDD.

(1) 40 CFR 63.11619(a), (b)(1), (c), (e);
(2) 40 CFR 63.11620(a);
(3) 40 CFR 63.11621(a), (b), (c), (d), (f);
(4) 40 CFR 63.11622(a), (b)(1), and (b)(3);
(5) 40 CFR 63.11623;
(6) 40 CFR 63.11624;
(7) 40 CFR 63.11625;
(8) 40 CFR 63.11626;
(9) 40 CFR 63.11627; and
(10) Table 1.

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart DDDDDDD.

(k) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

(l) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is 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 - Entire Source

The following state rules are applicable to the entire source:

(a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This existing source is not a major stationary source, under PSD (326 IAC 2-2), because:
(1) The potential to emit all PSD regulated pollutants are less than 250 tons per year,
(2) This source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

(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 thirty percent (30%) 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)
The source is subject to the requirements of 326 IAC 6-4, because the source has the potential to emit fugitive particulate emissions. 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 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year.

(h) 326 IAC 6.8 (PM Limitations for Lake County)
This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

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

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

State Rule Applicability – Individual Facilities

Grain Transport, Storage, and Processing

(a) 326 IAC 6.5 (Fugitive Particulate Matter Emission Limitations)
Pursuant to 326 IAC 6.5-1-1(a) and 326 IAC 6.5-1-2(a), this source is subject to the requirements of 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), because this source is located in Vanderburgh County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and has potential particulate matter emissions greater than 10 tons per year.

(1) Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from each grain receiving, handling, processing, mixing, storage, and shipping facility shall not exceed 0.03 grain per dry standard cubic foot (grains/dscf).

In order assure compliance with Condition D.1.1, each of the control device(s) associated with the emission units specified in the table below shall be in operation and control particulate emissions from the respective emission unit at all times that the emission unit is in operation.

Emission Unit	Control Device
Hammermill (HM-1)	Hammermill Cyclone #2
Micro room (Micro-1)	Baghouse (Micro Filter #4)
Pellet mills (CPM-1 and CPM-2) and pellet cooler (CPM cooler)	Pellet Cyclone #1
Packing operation (Packing-1)	Cyclone and Baghouse (Packer Filter #3)

(3) Pursuant to 326 IAC 6.5-1-2(d)(2) (Particulate Matter Limitations Except Lake County), the Permittee shall comply with the following for operations associated with the grain elevator:

The Permittee shall provide for housekeeping and maintenance procedures that minimize the opportunity for particulate matter to become airborne and leave the property, such as the following:

(A) Housekeeping practices shall be conducted as follows:

(i) Areas to be swept and maintained shall include, at a minimum, the following:

(aa) General grounds, yard, and other open areas.
(bb) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waste concentrations.
(cc) Grain driers with respect to accumulated particulate matter.

(ii) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.

(iii) Dust from driveways, access roads, and other areas of travel shall be controlled.

(iv) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

(B) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:

(i) Malfunctions.
(ii) Breakdowns.
(iii) Improper adjustment.
(iv) Operating above the rated or designed capacity.
(v) Not following designed operating specifications.
(vi) Lack of good preventive maintenance care.
(vii) Lack of critical and proper spare replacement parts on hand.
(viii) Lack of properly trained and experienced personnel.

(C) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined under 326 IAC 5-1.

(b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3), this rule does not apply if a particulate limitation established in 326 IAC 6.5 is more stringent than the particulate limitation established in 326 IAC 6-3-2. Since the particulate limitations established by 326 IAC 6.5-1-2 for each facility are more stringent than the particulate limitations that would be established by 326 IAC 6-3-2, the source is not subject to the requirements of 326 IAC 6-3-2.

Natural Gas-Fired Boiler

(c) 326 IAC 6.5 (Particulate Matter Limitations except Lake County)
This rule applies to sources or facilities with a potential to emit particulate matter located in the counties of Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne that are specifically listed in 326 IAC 6.5-2 through 6.5-10 or sources located in the above mentioned counties with either the potential to emit one hundred (100) tons or more per year or actual emissions of ten (10) tons or more. This source is located in Vanderburgh County, is not

specifically listed in 326 IAC 6.5-8 but has an unlimited potential to emit of greater than one hundred (100) tons per year. Therefore, the source is subject to the requirements of 326 IAC 6.5.

Pursuant to 326 IAC 6.5-1-2(a), the particulate matter (PM) from the one (1) natural gas-fired boiler (B-1) shall not exceed one hundredth (0.01) grain per dry standard cubic foot (dscf) since it is a gaseous fuel-fired steam generator located in Vanderburgh County.

(d) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
Pursuant to 326 IAC 7-1.1-1, the natural gas-fired boiler (B-1) is not subject to the requirements of 326 IAC 7-1.1, since it has unlimited sulfur dioxide (SO_2) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

(e) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The natural gas-fired boiler (B-1) is not subject to the requirements of 326 IAC 8-1-6, since it has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

Paved and Unpaved Roads

(f) 326 IAC 6.5 (PM Limitations Except Lake County)
This rule applies to sources or facilities with a potential to emit particulate matter located in the counties of Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne that are specifically listed in 326 IAC 6.5-2 through 6.5-10 or sources located in the above mentioned counties with either the potential to emit one hundred (100) tons or more per year or actual emissions of ten (10) tons or more. This source is located in Vanderburgh County, is not specifically listed in 326 IAC 6.5-8 but has an unlimited potential to emit of greater than one hundred (100) tons per year. Therefore, the source is subject to the requirements of 326 IAC 6.5.

Therefore, pursuant to 6.5-1-2(a), PM emissions from the paved and unpaved roads shall continue to not exceed seven hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Compliance Determination, Monitoring and Testing Requirements

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

Emission Units	Control Device	Operating Parameters	Frequency	Range	Excursions and Exceedances
Pellet Process[(1)]	Cyclone	Visible Emissions	Daily	Normal/Abnormal	Response Steps

[(1)] These monitoring conditions are necessary because the cyclone for the pellet process must operate properly to assure compliance with 326 IAC 6.5 (Particulate Matter Limitations Except Lake County) and 40 CFR 63, Subpart DDDDDDD, and to be considered integral to the process.

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 December 10, 2015.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Review and MSOP No. M163-36601-00033. The staff recommends to the Commissioner that this New Source Review and MSOP be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Adam Wheat at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-8397 or toll free at 1-800-451-6027 extension 3-8397.

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

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

TSD Appendix A: Emission Calculation
Particulate Sources of Emissions

Company Name: Purina Animal Nutrition, LLC
Source Address: 2124 Lynch Rd., Evansville, IN 47711
Permit Number: M163-36601-00033
Reviewer: Adam Wheat

Potential to Emit Before Integral Controls

Process	PM	PM10	PM2.5	SOx	NOx	VOC	CO	Total HAPs	Single HAPs	
Grain Handling										
Grain Receiving Shed (Receiving-1)	1.86	0.27	0.27	-	-	-	-	0.13	0.13	Manganese
Train Receiving Shed (Receiving-2)	1.86	0.27	0.27	-	-	-	-			
Bin Loading and Grain Handling (Handling-1)	5.48	1.38	0.24	-	-	-	-			
Storage Bins (Vent)	13.36	7.45	1.27	-	-	-	-			
Grain Processing										
Hammermill (grinding) (HM-1)	5.87	2.93	2.93	-	-	-	-	-	-	-
Grain Cracker (GC-1)	1.05	0.53	0.53	-	-	-	-	-	-	-
Batch Mixer (Mixer-1)	0.00	0.00	0.00	-	-	-	-	-	-	-
Pellet Operations (CPM-1, CPM-2)	43.80	21.90	21.90	-	-	-	-	3.8E-02	3.8E-02	Mangenese
Micro Room (Micro-1)	0.07	0.04	0.01	-	-	-	-	5.8E-05	5.8E-05	Mangenese
Block Mixing (Mixer-2 and Mixer-3)	0.00	0.00	0.00	-	-	-	-	-	-	-
Block Presses (BP-1)	-	-	-	-	-	-	-	-	-	-
Packing Operation (Packing-1)	0.14	0.04	0.04	-	-	-	-	1.2E-04	1.2E-04	Mangenese
Bulk Loadout (Loadout-1)	0.36	0.09	0.09	-	-	-	-	3.1E-04	3.1E-04	Mangenese
Boiler (B-1)	0.05	0.20	0.20	0.02	2.70	0.15	2.26	0.05	0.05	Hexane
Paved Road Emissions	1.57	0.31	0.08	-	-	-	-	-	-	-
Unpaved Roads Emissions	0.89	0.24	0.02	-	-	-	-	-	-	-
Total	**73.90**	**35.10**	**27.75**	**0.02**	**2.70**	**0.15**	**2.26**	**0.22**	**0.17**	**Manganese**

Potential to Emit After Integral Controls

Process	PM	PM10	PM2.5	SOx	NOx	VOC	CO	Total HAPs	Single HAPs	
Grain Handling										
Grain Receiving Shed (Receiving-1)	1.86	0.27	0.27	-	-	-	-	0.13	0.13	Manganese
Train Receiving Shed (Receiving-2)	1.86	0.27	0.27	-	-	-	-			
Bin Loading and Grain Handling (Handling-1)	5.48	1.38	0.24	-	-	-	-			
Storage Bins (Vent)	13.36	7.45	1.27	-	-	-	-			
Grain Processing										
Hammermill (grinding) (HM-1)	5.87	2.93	2.93	-	-	-	-	-	-	-
Grain Cracker (GC-1)	1.05	0.53	0.53	-	-	-	-	-	-	-
Batch Mixer (Mixer-1)	0.00	0.00	0.00	-	-	-	-	-	-	-
Pellet Operations (CPM-1, CPM-2)	6.57	3.29	3.29	-	-	-	-	7.9E-03	7.9E-03	Mangenese
Micro Room (Micro-1)	0.07	0.04	0.01	-	-	-	-	5.8E-05	5.8E-05	Mangenese
Block Mixing (Mixer-2 and Mixer-3)	0.00	0.00	0.00	-	-	-	-	-	-	-
Block Presses (BP-1)	-	-	-	-	-	-	-	-	-	-
Packing Operation (Packing-1)	0.14	0.04	0.04	-	-	-	-	1.2E-04	1.2E-04	Mangenese
Bulk Loadout (Loadout-1)	0.36	0.09	0.09	-	-	-	-	3.1E-04	3.1E-04	Mangenese
Boiler (B-1)	0.05	0.20	0.20	0.02	2.70	0.15	2.26	5.1E-02	4.9E-02	Hexane
Paved Road Emissions	1.57	0.31	0.08	-	-	-	-	-	-	-
Unpaved Roads Emissions	0.89	0.24	0.02	-	-	-	-	-	-	-
Total	**36.67**	**16.48**	**9.14**	**0.02**	**2.70**	**0.15**	**2.26**	**0.19**	**0.14**	**Manganese**

TSD Appendix A: Emission Calculation
Particulate Sources of Emissions

Company Name: Purina Animal Nutrition, LLC
Source Address: 2124 Lynch Rd., Evansville, IN 47711
Permit Number: M163-36601-00033
Reviewer: Adam Wheat

Potential Particulate Emissions

Emission Unit	Maximum Capacity (ton/hr)	Maximum Capacity (tons/yr)	Emission Factor (lb/ton)			Uncontrolled PTE (lbs/hr)			Uncontrolled PTE (tons/yr)		
			PM	PM10	PM2.5	PM	PM10	PM2.5	PM	PM10	PM2.5
Grain Receiving Shed (Receiving-1)	25.0	219,000	0.017	0.0025	0.0025	0.43	0.06	0.06	1.86	0.27	0.27
Train Receiving Shed (Receiving-2)	25.0	219,000	0.017	0.0025	0.0025	0.43	0.06	0.06	1.86	0.27	0.27
Bin Loading and Grain Handling (Handling-1)	50.0	438,000	0.025	0.0063	0.0011	1.25	0.32	0.06	5.48	1.38	0.24
Storage Bins (Vent) (Storage-1)	50.0	438,000	0.061	0.034	0.0058	3.05	1.70	0.29	13.36	7.45	1.27
					Total:	**5.15**	**2.14**	**0.47**	**22.56**	**9.37**	**2.06**

METHODOLOGY
Emission factors are from AP 42 Tables 9.9.1-1 and 9.9.1-2.
Uncontrolled PTE (lbs/hr) = Maximum Capacity (tons/hr) * Emission Factor (lbs/ton)
Uncontrolled PTE (tons/yr) = Uncontrolled PTE (lbs/hr) * 8760 (hrs/yr) / 2000 (lbs/ton)

Potential HAP Emissions

Emission Unit	Amount of Micronutrient stored in bulk in 2015 (lbs/yr)	Actual Micronutrient Usage (lbs/hr)	Maximum Potential Throguhput of Micronutrient (lbs/yr)	Maximum Potential Throguhput of Micronutrient (tons/yr)	Emission Factor (lb/ton)* PM	Potential Manganese Emissions tons/yr	Potential Chromium Emissions** tons/yr
Train Receiving Shed (Receiving-2)	162,000	81	709,560	354.8	0.73	0.13	0.00
Bin Loading and Grain Handling (Handling-1)	11,800	5.9	51,684	25.8	0.73	0.01	0.00
Storage Bins (Vent) (Storage-1)	11,800	5.9	51,684	25.8	0.73	0.01	0.00
			Total Potential Manegese Emissions from Handling:			**0.13**	
			Total Potential Chromium Emissions from Handling:			**0.00**	
					Total HAPs from Handling:	**0.13**	

METHODOLOGY
*Emission factors are from AP 42 Tables 11.12-2 Emission Factors for Concrete Batching
*Chromium is received in 50lb bags and is not processed and stored in Receiving-2, Handling-1, and Storage-1.
Actual Micronutrient Usage (lbs/hr) = Amount of Micronutrient stored in bulk in 2015 (lbs/yr) / 2000 (hrs of operation in 2015)
Potential HAP emissions (tons/yr) = Maximum Potential Throughput of Micronutrient (tons/yr) * Emission Factor (lb/ton)

TSD Appendix A: Emission Calculation
Particulate Emissions from Processing Equipment

Company Name: Purina Animal Nutrition, LLC
Source Address: 2124 Lynch Rd., Evansville, IN 47711
Permit Number: M163-36601-00033
Reviewer: Adam Wheat

Potential to Emit Particulate from Processing

Emission Unit	Unit ID	Maximum Capacity	Maximum Capacity	Emission Factor Information	Emission Factor (lb/ton)			PTE before controls (lbs/hr)			PTE before controls (tons/yr)			PTE after controls (lbs/hr)			PTE after controls (tons/yr)		
					PM	PM10	PM2.5	PM	PM10	PM2.5	PM	PM10	PM2.5	PM	PM10	PM2.5	PM	PM10	PM2.5
Hammermill[A]	HM-1	3.0	26,280	Controlled Table 9.9.1-2 (Hammermill)	0.067	0.0335	0.0335	1.34	0.67	0.67	5.87	2.93	2.93	0.20	0.10	0.10	0.88	0.44	0.44
Grain Cracker[A,D]	GC-1	1.5	13,140	Controlled Table 9.9.1-2 (Grain Cracker)	0.024	0.012	0.012	0.24	0.12	0.12	1.05	0.53	0.53	0.04	0.02	0.02	0.16	0.08	0.08
Batch Mixer[B]	Mixer-1	18.0	157,680	Uncontrolled Table 11.12-2 (Mixer Loading)	0.000	0.000	0.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pelleting Operations[A, C]	CPM-1, CPM-2	10.0	87,600	Controlled Table 9.9.1-2 (Pellet Cooler)	0.15	0.075	0.075	10.00	5.00	5.00	43.80	21.90	21.90	1.50	0.75	0.75	6.57	3.29	3.29
Micro Room	Micro-1	0.25	2,190	Uncontrolled Table 9.9.1-1 (Headhouse and grain handling)	0.061	0.034	0.0058	0.02	0.01	0.00	0.07	0.04	0.01	0.02	0.01	0.00	0.07	0.04	0.01
Block Mixers[B]	Mixer-2, Mixer-3	2.0	17,520	Uncontrolled Table 11.12-2 (Mixer Loading)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Block Presses[E]	BP-1	2.0	17,520	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Packing Operation	Packing-1	10.0	87,600	Uncontrolled Table 9.9.1-2 (Feed Shipping)	0.0033	0.0008	0.0008	0.03	0.01	0.01	0.14	0.04	0.04	0.03	0.01	0.01	0.14	0.04	0.04
Bulk Loadout	Loadout-1	25.0	219,000	Uncontrolled Table 9.9.1-2 (Feed Shipping)	0.0033	0.0008	0.0008	0.08	0.02	0.02	0.36	0.09	0.09	0.08	0.02	0.02	0.36	0.09	0.09
						Total:	**11.71**	**5.83**	**5.82**	**51.29**	**25.52**	**25.49**	**1.87**	**0.91**	**0.90**	**8.18**	**3.96**	**3.93**	

Hammermill Cyclone Efficiency: **85%**
Assumed Grain Cracker Cyclone Efficiency: **85%**
Pellet Cooler Cyclone Efficienct: **85%**

Emission factors are from AP 42 Tables 9.9.1-1 and 9.9.1-2, unless otherwise noted.

[A]No PM10 data available, PM10 is assumed to 50% of PM emission.

[B]Particulate emissions are assumed to be negligible for the mixers since each mixer is covered during the addition and mixing of materials. When each mixer is loaded, displaced air and any particulate emissions are directed into a surge hopper that sits directly on top of each mixer. Additionally, all products made in the mixers contains mineral oil, molasses, or both, reducing potenial particulate emissions to negligible levels.

[C]The pellet cooler cyclone (Pellet Cyclone #1) is considered an integral part of the pelleting operation.

[D]The only AP-42 emission factor for grain cracking assumes a cyclone is controlling emissions. Since the grain cracker does not use controls, a conservative control efficiency of 85% was used to calculate uncontrolled PTE.

[E]The Block Press has a negligible potential to emit PM/PM10/PM2.5.

METHODOLOGY
Uncontrolled PTE (lbs/hr) = Maximum Capacity (tons/hr) * Emission Factor (lbs/ton)
Uncontrolled PTE (tons/yr) = Uncontrolled PTE (lbs/hr) * 8760 (hrs/yr) / 2000 (lbs/ton)

Potential to Emit HAPs from Processing

Emission Unit	Unit ID	Maximum Capacity (ton/hr)	Maximum Capacity (tons/yr)	Percentage micronutrient that is elemental HAP (weight %)		Manganese			Chromium			Total HAP Emissions	
						(weight %)	Before Controls	After Controls	(weight %)	Before Controls	After Controls	Before Controls	After Controls
				Manganese	Chromium		(tons/yr)			(tons/yr)		(tons/yr)	
Hammermill[A]	HM-1	3.0	26,280	72.0%	0.40%	0.00%	-	-	0.00%	-	-	-	-
Grain Cracker[A]	GC-1	1.5	13,140	72.0%	0.40%	0.00%	-	-	0.00%	-	-	-	-
Batch Mixer[B]	Mixer-1	18.0	157,680	72.0%	0.40%	0.00%	-	-	0.00%	-	-	-	-
Pelletizing	CPM-1, CPM-2	10.0	87,600	72.0%	0.40%	0.12%	3.8E-02	7.9E-03	0.01%	1.8E-05	2.6E-06	3.8E-02	7.9E-03
Micro Room	Micro-1	0.3	2,190	72.0%	0.40%	0.12%	5.8E-05	8.0E-05	0.01%	2.7E-08	2.7E-08	5.8E-05	8.0E-05
Block Mixers[B]	Mixer-2, Mixer-3	4.0	35,040	72.0%	0.40%	0.00%	-	-	0.00%	-	-	-	-
Block Press[B]	BP-1	4.0	35,040	72.0%	0.40%	0.12%	-	-	0.01%	-	-	-	-
Packing Operation	Packing-1	10.0	87,600	72.0%	0.40%	0.12%	1.2E-04	1.7E-04	0.01%	5.8E-08	5.8E-08	1.2E-04	1.7E-04
Bulk Loadout	Loadout-1	25.0	219,000	72.0%	0.40%	0.12%	3.1E-04	4.3E-04	0.01%	1.4E-07	1.4E-07	3.1E-04	4.3E-04

[A]The Hammermill and Grain Cracker do not process product containing Manganese and Chromium.

[B]Since the Batch Mixer, Block Mixers, and Block Presses have negligible potential to emit PM/PM10/PM2.5, there is no calculation for Manganese and Chromium.

METHODOLOGY
PTE of Manganese or Chromium (Before Control) (tons/yr) = PTE of PM before controls (tons/yr) * (Weight % Manganese or Chromium)
PTE of Manganese or Chromium (After Control) (tons/yr) = PTE of PM after controls (tons/yr) * (Weight % Manganese or Chromium)
PTE of Total HAPs (Before Control) = PTE of Manganese (Before Control) (tons/yr) + PTE of Chromium (Before Control) (tons/yr)
PTE of Total HAPs (After Control) = PTE of Manganese (After Control) (tons/yr) + PTE of Chromium (After Control) (tons/yr)

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Boiler B-1

Company Name: Purina Animal Nutrition, LLC
Source Address: 2124 Lynch Rd., Evansville, IN 47711
Permit Number: F163-36601-00033
Reviewer: Adam Wheat

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
6.277	1020	53.9

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.05	0.20	0.20	0.02	2.70	0.15	2.26

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

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	5.7E-05	3.2E-05	2.0E-03	0.05	9.2E-05	**0.05**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.3E-05	3.0E-05	3.8E-05	1.0E-05	5.7E-05	**1.5E-04**
					Total HAPs	**0.05**
					Worst HAP	**0.05**

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

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: Purina Animal Nutrition, LLC
Source Address: 2124 Lynch Rd., Evansville, IN 47711
Permit Number: F163-36601-00033
Reviewer: Adam Wheat

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 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	4.0	4.0	16.0	40.0	640.0	150	0.028	0.5	165.9
Vehicle (leaving plant) (one-way trip)	4.0	4.0	16.0	15.0	240.0	150	0.028	0.5	165.9
		Totals	**32.0**		**880.0**			**0.9**	**331.8**

Average Vehicle Weight Per Trip = 27.5 tons/trip
Average Miles Per Trip = 0.03 miles/trip

Unmitigated Emission Factor, Ef = k*[(s/12)^a]*[(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 =	6.0	6.0	6.0	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	27.5	27.5	27.5	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [(365 - P)/365] (Equation 2 from AP-42 13.2.2)
Mitigated Emission Factor, Eext = E * [(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, Ef =	8.17	2.18	0.22	lb/mile
Mitigated Emission Factor, Eext =	5.38	1.43	0.14	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.68	0.18	0.02	0.45	0.12	0.01
Vehicle (leaving plant) (one-way trip)	0.68	0.18	0.02	0.45	0.12	0.01
Totals	**1.36**	**0.36**	**0.04**	**0.89**	**0.24**	**0.02**

Methodology

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

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

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Purina Animal Nutrition, LLC
Source Address: 2124 Lynch Rd., Evansville, IN 47711
Permit Number: F163-36601-00033
Reviewer: Adam Wheat

Paved Roads at Industrial Site
The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Informtation (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	15.0	1.0	15.0	15.0	225.0	650	0.123	1.8	674.0
Vehicle (leaving plant) (one-way trip)	15.0	1.0	15.0	40.0	600.0	650	0.123	1.8	674.0
		Totals	**30.0**		**825.0**			**3.7**	**1348.0**

Average Vehicle Weight Per Trip = 27.5 tons/trip
Average Miles Per Trip = 0.12 miles/trip

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

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

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	2.555	0.511	0.1255	lb/mile
Mitigated Emission Factor, Eext =	2.337	0.467	0.1147	lb/mile

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)
Vehicle (entering plant) (one-way trip)	0.86	0.17	0.04	0.79	0.16	0.04
Vehicle (leaving plant) (one-way trip)	0.86	0.17	0.04	0.79	0.16	0.04
Totals	**1.72**	**0.34**	**0.08**	**1.57**	**0.31**	**0.08**

Methodology

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

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 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

Carol S. Comer
Commissioner

Notice of Public Comment

September 29, 2016
Purina Animal Nutrition, LLC
163-36601-00033

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 2/17/2016

Indiana Department of Environmental Management
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Michael R. Pence
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Commissioner

September 29, 2016

Mr. Heath Stinson
Purina Animal Nutrition, LLC
2124 Lynch Road
Evansville, IN 47711

Re: Public Notice
Purina Animal Nutrition, LLC
Permit Level: New Source Construction & MSOP
Permit Number: 163-36601-00033

Dear Mr. Stinson:

Enclosed is a copy of your draft New Source Construction, MSOP, 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 Evansville Courier in Evansville, Indiana publish the abbreviated version of the public notice no later than October 2, 2016. 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 Evansville Vanderburgh Public Library, 3001 Oaklyn Drive in Evansville, 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 Adam Wheat, 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 3-8397 or dial (317) 233-8397.

Sincerely,

Greg Hotopp

Greg Hotopp
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016

Indiana Department of Environmental Management
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Michael R. Pence
Governor

Carol S. Comer
Commissioner

September 29, 2016

To: Evansville Vanderburgh 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: Purina Animal Nutrition, LLC
Permit Number: 163-36601-00033

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 2/16/2016

Indiana Department of Environmental Management
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Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

September 29, 2016

Evansville Courier
PO Box 268
Evansville, IN 47702

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Purina Animal Nutrition, LLC, Vanderburgh 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 October 2, 2016.

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 Greg Hotopp at 800-451-6027 and ask for extension 4-3493 or dial 317-234-3493.

Sincerely,

Greg Hotopp

Greg Hotopp
Permit Branch
Office of Air Quality

Permit Level: New Source Construction & Minor Source Operating Permit
Permit Number: 163-36601-00033

Enclosure

PN Newspaper.dot 2/17/2016

Mail Code 61-53

IDEM Staff	GHOTOPP 9/29/2016 Purina Animal Nutrition LLC 163-36601-00033 Draft		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Heath Stinson Purina Animal Nutrition LLC 2124 Lynch Rd Evansville IN 47711 (Source CAATS)									
2		David Boggs 216 Western Hills Dr Mt Vernon IN 47620 *(Affected Party)*									
3		John Blair 800 Adams Ave Evansville IN 47713 *(Affected Party)*									
4		Paul A Luther Luther EHS Consulting, LLC 216 Parkland Avenue St. Louis MO 63122 *(Consultant)*									
5		Evansville Library (Branch) Oaklyn Branch, 3001 Oaklyn Dr Evansville IN 47711 *(Library)*									
6		Evansville City Council and Mayors Office 1NW MLK Blvd, Rm 302 Evansville IN 47708 *(Local Official)*									
7		Vanderburgh County Commissioners 1 NW MLK Blvd, Rm 305 Evansville IN 47708 *(Local Official)*									
8		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 *(Affected Party)*									
9		Vanderburgh County Health Dept. 420 Milberry Street Evansville IN 47713-1888 *(Health Department)*									
10		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 *(Affected Party)*									
11											
12											
13											
14											
15											

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