



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
Significant Modification to a
Part 70 Operating Permit

for Naturally Recycled Proteins of Indiana, LLC in Blackford County

Significant Source Modification No.: 009-36739-00025

Significant Permit Modification No.: 009-36748-00025

The Indiana Department of Environmental Management (IDEM) has received an application from Naturally Recycled Proteins of Indiana, LLC, located at 4 McGeath Blvd., Montpelier, Indiana 47359, for a significant modification of its Part 70 Operating Permit issued on January 5, 2016. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Naturally Recycled Proteins of Indiana, LLC to make certain changes at its existing source. Naturally Recycled Proteins of Indiana, LLC has applied to construct new emission units, modify existing emission units, and increase the hourly and annual production rates.

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

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

Montpelier Indiana Public Library
301 South Main Street
Montpelier, IN, 47359

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 SSM 009-36739-00025 and SPM 009-36748-00025 in all correspondence.

Comments should be sent to:

Tamara Havics
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 2-8219
Or dial directly: (317) 232-8219
Fax: (317) 232-6749 attn: Tamara Havics
E-mail: THavics@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 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 Tamara Havics of my staff at the above address.



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



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Part 70 Operating Permit Renewal DRAFT OFFICE OF AIR QUALITY

**Naturally Recycled Proteins of Indiana, LLC
4 McGeath Blvd
Montpelier, Indiana 47359**

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

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

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

Operation Permit No.: T009-36059-00025	
Issued by: / Original Signed by: Jason R. Krawczyk, Section Chief Permits Branch, Office of Air Quality	Issuance Date: January 5, 2016 Expiration Date: January 5, 2021

First Significant Permit Modification No.: 009-36748-00025	
Issued by: Jason R. Krawczyk, Section Chief Permits Branch, Office of Air Quality	Issuance Date: Expiration Date: January 5, 2021

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary high-protein pet food flavoring manufacturing facility.

Source Address:	4 McGeath Blvd, Montpelier, Indiana 47359
General Source Phone Number:	(515) 253-0943
SIC Code:	2047 (Dog and Cat Food)
County Location:	Blackford
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) Two (2) solid raw material hammermills, identified as EP3-1 and EP3-2, constructed in 2011 and approved in 2016 for modification, each with a maximum capacity of 6.0 tons per hour, with particulate emissions controlled by a baghouse, and exhausting internally.
- (b) Three (3) direct, natural gas fired product dryers, identified as EP1 and EP2, constructed in 2011, and EP4, approved in 2016 for construction, each with a maximum input capacity of 8.1 tons per hour wet material received from the blender, each with a maximum output capacity of 6.0 tons per hour dried material, each with a maximum heat input capacity of 15 MMBtu/hr, with emissions uncontrolled, and exhausting through stacks EP-1, EP-2, EP-4a, and EP-4b.
- (c) One (1) dried product hammermill, identified as EP3-3, constructed in 2011 and approved in 2016 for modification, with a maximum capacity of 18.0 tons per hour, with particulate emissions controlled by a baghouse, and exhausting internally.

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

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

- (a) Truck receiving of solid raw materials, exhausting internally.
- (b) Thirteen (13) raw product liquid storage tanks for storage of stabilized poultry solubles, vented and exhausting internally.
- (c) Twelve (12) ingredient bins for storage of solid raw material, tote fed or bulk fed via conveyors, and exhausting internally.

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- (d) Conveyance of solid materials, exhausting internally.
- (e) One (1) enclosed solids material mixer, exhausting internally.
- (f) Three (3) mixed material blenders, exhausting internally.
- (g) One hundred and eight (108) storage bins for finished dried product, elevator/auger fed, and exhausting internally.
- (h) Finished product load-out, exhausting internally.
- (i) Unpaved roads for material receiving and product shipping.
- (j) Space heaters, process heaters, or boilers with natural gas-fired combustion with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
 - (1) One (1) Hi-Efficiency Furnace (Office), with a maximum heat input capacity of 0.135 MMBtu/hr.
 - (2) One (1) Water Heater (Office), with a maximum heat input capacity of 0.05 MMBtu/hr.
 - (3) One (1) Dryer Room Make-up Air Unit, with a maximum heat input capacity of 5.775 MMBtu/hr.
 - (4) Four (4) Tanker Bay Radiant Heaters, each with a maximum heat input capacity of 0.1 MMBtu/hr.
 - (5) Four (4) Tank Area Radiant Heaters, each with a maximum heat input capacity of 0.15 MMBtu/hr.
 - (6) One (1) Hotsy Model 1835 (Plant), with a maximum heat input capacity of 0.558 MMBtu/hr.
 - (7) One (1) Hi-Efficiency Furnace (Truck Building Office), with a maximum heat input capacity of 0.135 MMBtu/hr.
 - (8) One (1) Water Heater (Truck Building Office), with a maximum heat input capacity of 0.05 MMBtu/hr.
 - (9) Two (2) Shop Radiant Heaters, each with a maximum heat input capacity of 0.25 MMBtu/hr.
 - (10) One (1) Hotsy Model 1835 (Shop), with a maximum heat input capacity of 0.558 MMBtu/hr.
- (k) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (l) Blowdown for compressors and pumps.
- (m) Emissions for a laboratory as defined in 326 IAC 2-7-1(21)(D).

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

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

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

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SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T009-36059-00025, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

and

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

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

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

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance,

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IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T009-36059-00025 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

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

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

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

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

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

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

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

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

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

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

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

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

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

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- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

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

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

Indiana Department of Environmental Management

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

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

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

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

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

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

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

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SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(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 Opacity [326 IAC 5-1]
-
- Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 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.4 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.5 Fugitive Dust Emissions [326 IAC 6-4]
-
- The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Stack Height [326 IAC 1-7]
-
- The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.
- C.7 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

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326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

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

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

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

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

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]

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

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

C.13 Risk Management Plan [326 IAC 2-7-5(12)][40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;

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

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

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

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

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The statement must be submitted to:

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

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

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

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the Part 70 permit.

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

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

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

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

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

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

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) solid raw material hammermills, identified as EP3-1 and EP3-2, constructed in 2011 and approved in 2016 for modification, each with a maximum capacity of 6.0 tons per hour, with particulate emissions controlled by a baghouse, and exhausting internally.
- (b) Three (3) direct, natural gas fired product dryers, identified as EP1 and EP2, constructed in 2011, and EP4, approved in 2016 for construction, each with a maximum input capacity of 8.1 tons per hour wet material received from the blender, each with a maximum output capacity of 6.0 tons per hour dried material, each with a maximum heat input capacity of 15 MMBtu/hr, with emissions uncontrolled, and exhausting through stacks EP-1, EP-2, EP-4a, and EP-4b.
- (c) One (1) dried product hammermill, identified as EP3-3, constructed in 2011 and approved in 2016 for modification, with a maximum capacity of 18.0 tons per hour, with particulate emissions controlled by a baghouse, and exhausting internally.

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

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

D.1.1 PSD Minor Limits [326 IAC 2-2]

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

- (a) PM emissions from the two (2) solid raw material hammermills, identified as EP3-1 and EP3-2, shall not exceed four and forty-five hundredths (4.45) pounds per hour, each;
- (b) PM emissions from the one (1) dried product hammermill, identified as EP3-3, shall not exceed thirteen and thirty hundredths (13.30) pounds per hour;
- (c) PM₁₀ emissions from the two (2) solid raw material hammermills, identified as EP3-1 and EP3-2, shall not exceed three and seventeen hundredths (3.17) pounds per hour, each; and
- (d) PM₁₀ emissions from the one (1) dried product hammermill, identified as EP3-3, shall not exceed nine and fifty-one hundredths (9.51) pounds per hour.

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the two (2) solid raw material hammermills (EP3-1 and EP3-2), the dried product hammermill (EP3-3), and the three (3) dryers (EP1, EP2 and EP4) shall not exceed the values listed in the table below when operating at the listed process weight rates.

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Emission Unit	Process Weight Rate (P) (ton/hr)	326 IAC 6-3-2 Allowable PM Rate (E) (lb/hr)
EP3-1: Solids Hammermill #1	6.0	13.62
EP3-2: Solids Hammermill #2	6.0	13.62
EP1: Dryer #1	8.1	16.65
EP2: Dryer #2	8.1	16.65
EP4: Dryer #3	8.1	16.65
Conveying, Solids Material	12	21.67
Solids Materials Mixer	12	21.67
EP3-3: Dried Product Hammermill	18.0	28.43

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

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

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

Where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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 plans required by this condition.

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

D.1.4 Particulate Control

- (a) In order to assure compliance with Condition D.1.1, the baghouses for particulate control shall be in operation and control emissions from two (2) solid raw material hammermills (EP3-1 and EP3-2), and the dried product hammermill (EP3-3), at all times the units are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.5 Testing Requirements [326 IAC 2-1.1-11]

No later than 180 days after the startup of the one (1) direct, natural gas fired product dryer, identified as EP4, in order to verify uncontrolled emission factors, the Permittee shall perform PM, PM10, and PM2.5 testing of the exhaust from one (1) of the three (3) product dryers (EP1, EP2, or EP4), utilizing methods approved by the Commissioner. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the testing required by this condition. PM10 and PM2.5 include filterable and condensable particulate matter.

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

D.1.6 Parametric Monitoring

In order to demonstrate the compliance status with Condition D.1.1, the Permittee shall record the pressure drop across each baghouse at least once per day when the associated hammermill unit is in operation. When, for any one reading, the pressure drop across a baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for these units is a pressure drop between 0.30 and 5.0 inches of water, unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.1.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.1.8 Record Keeping Requirements

- (a) In order to document the compliance status with Condition D.1.6, the Permittee shall maintain daily records of pressure drop across the baghouses. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the record keeping required by this condition.

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

Source Name: Naturally Recycled Proteins of Indiana, LLC
Source Address: 4 McGeath Blvd, Montpelier, Indiana 47359
Part 70 Permit No.: T009-36059-00025

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Naturally Recycled Proteins of Indiana, LLC
Source Address: 4 McGeath Blvd, Montpelier, Indiana 47359
Part 70 Permit No.: T009-36059-00025

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Source Name: Naturally Recycled Proteins of Indiana, LLC
Source Address: 4 McGeath Blvd, Montpelier, Indiana 47359
Part 70 Permit No.: T009-36059-00025

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

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

Source Description and Location

Source Name:	Naturally Recycled Proteins of Indiana, LLC
Source Location:	4 McGeath Blvd., Montpelier, Indiana 47359
County:	Blackford
SIC Code:	2047 (Dog and Cat Food)
Operation Permit No.:	T009-36059-00025
Operation Permit Issuance Date:	January 5, 2016
Significant Source Modification No.:	009-36739-00025
Significant Permit Modification No.:	009-36748-00025
Permit Reviewer:	Tamara Havics

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T009-36059-00025 on January 5, 2016. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Blackford County.

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

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Blackford 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}**
Blackford County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of

Significant Deterioration (PSD), 326 IAC 2-2.

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

Fugitive Emissions

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

Source Status - Existing Source

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

Pollutant	Emissions (ton/yr)
PM	120.75
PM ₁₀	221.29
PM _{2.5}	216.85
SO ₂	0.10
NO _x	16.64
VOC	63.20
CO	13.98
Total HAPs	62.60*
Worst Single HAP	62.28*

*HAPs for Dryers (EP1 and EP2) were estimated by assuming all VOC is VHAP

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

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

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

- (c) These emissions are based on the Technical Support Document for Part 70 Operating Permit Renewal No. T009-36059-00025, issued January 5, 2016.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Naturally Recycled Proteins of Indiana, LLC on January 21, 2016, relating to the construction of new emission units, modification to existing emission units, and an increase in the hourly and annual production rates. Additional information was received on March 3, 2016.

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

- (a) One (1) direct, natural gas fired product dryer, identified as EP3, approved in 2016 for construction, with a maximum input capacity of 8.1 tons per hour of wet material received from the blender, with a maximum output capacity of 6.0 tons per hour dried material, with a maximum heat input capacity of 15 MMBtu/hr, with emissions uncontrolled, and exhausting through two (2) stacks EP-4a and EP-4b.

The following is a list of the proposed insignificant activities:

- (a) One (1) mixed material blender, exhausting internally.
(b) Seventy-two (72) storage bins for finished dried product, elevator/auger fed, and exhausting internally.

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

- (a) Two (2) solid raw material hammermills, identified as EP3-1 and EP3-2, constructed in 2011 and approved in 2016 for modification, each with a maximum capacity of 6.0 tons per hour, with particulate emissions controlled by a baghouse, and exhausting internally.
(b) One (1) dried product hammermill, identified as EP3-3, constructed in 2011 and approved in 2016 for modification, with a maximum capacity of 18.0 tons per hour, with particulate emissions controlled by a baghouse, and exhausting internally.

The following is a list of the affected insignificant activities:

- (a) Truck receiving of solid raw materials, exhausting internally.
(b) Conveyance of solid materials, exhausting internally.
(c) One (1) enclosed solids material mixer, exhausting internally.
(d) Two (2) mixed material blenders, exhausting internally.
(e) Thirty-six (36) storage bins for finished dried product, elevator/auger fed, and exhausting internally.
(f) Finished product load-out, exhausting internally.
(g) Unpaved roads for material receiving and product shipping.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
EP-1	EP1 (Dryer #1)	85	4.25	40,000	190
EP-2	EP2 (Dryer #2)	85	4.50	48,000	120
EP-4a	EP4 (Dryer #3)	80	4.00	40,000	190
EP-4b	EP4 (Cooler #3)	80	4.00	48,000	120

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

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

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

Increase in PTE Before Controls of the Modification: New Units	
Pollutant	Potential To Emit (ton/yr)
PM	47.10
PM ₁₀	58.23
PM _{2.5}	53.82
SO ₂	0.04
NO _x	6.44
VOC	21.10
CO	5.41
HAPs	0.12

PTE Change of the Modified Process			
Pollutant	PTE Before Modification (ton/yr)	PTE After Modification (ton/yr)	Increase from Modification (ton/yr)
PM	120.75	262.81	142.06
PM ₁₀	221.29	200.19	0
PM _{2.5}	216.85	187.71	0
SO ₂	0.10	0.10	0
NO _x	16.64	16.64	0
VOC	28.31	42.41	14.10
CO	13.98	13.98	0
HAPs	62.28	0.31	0

Total PTE Increase due to the Modification			
Pollutant	PTE New Emission Units (ton/yr)	Increase to PTE of Modified Emission Units (ton/yr)	Total PTE for New and Modified Units (ton/yr)
PM	47.10	142.06*	189.16
PM ₁₀	58.23	0	58.23
PM _{2.5}	53.82	0	53.82
SO ₂	0.04	0	0.04
NO _x	6.44	0	6.44
VOC	21.10	14.10	35.21
CO	5.41	0	5.41
HAPs	0.12	0	0.12

*Dryer Emission Factors updated based on November 2015 stack test results.

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

This source modification is subject to 326 IAC 2-7-10.5(g)(4)(A) and (D) because the potentials to emit PM, PM₁₀, PM_{2.5}, and VOC are each greater than twenty-five (25) tons per year. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because it requires a case-by-case determination of an emission limitation and includes significant changes to existing monitoring Part 70 permit terms and conditions.

Permit Level Determination – PSD

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 source modification and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process / Emission Unit	Project Emissions (ton/yr)						
	PM*	PM₁₀	PM_{2.5}*	SO₂	NO_x	VOC	CO
EP4 - Dryer #3	44.94	57.03	53.61	0.04	6.44	21.10	5.41
Mixed Materials Blender #3	2.16	1.21	0.21	-	-	-	-
Modified Units	142.06	0	0	0.00	0.00	14.10	0.00
Total for Modification	189.16	58.23	53.82	0.04	6.44	35.21	5.41
PSD Major Source Thresholds	250	250	250	250	250	250	250

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

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

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Permit (tons/year)							
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	Total HAPs
* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant. **PM _{2.5} listed is direct PM _{2.5} .								

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this modification:

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Prepared Feeds Manufacturing, Subpart DDDDDDD are not included in the permit, because although the source is an area source of emissions of HAPs, the source is not a prepared animal feed manufacturing facility, as defined in 40 CFR 63.11627.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit for this source.

Compliance Assurance Monitoring (CAM):

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

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the new or modified units as part of this modification since none of the new or modified emission units has a potential to emit before controls equal to or greater than the Part 70 major source thresholds.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is subject to 326 IAC 1-6-3.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The source-wide unrestricted potentials to emit of PM and PM₁₀ each exceed 250 tons per year. In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- (a) PM emissions from the two (2) solid raw material hammermills, identified as EP3-1 and EP3-2, shall not exceed four and forty-five hundredths (4.45) pounds per hour, each;
- (b) PM emissions from the one (1) dried product hammermill, identified as EP3-3, shall not exceed thirteen and thirty hundredths (13.30) pounds per hour;
- (c) PM₁₀ emissions from the two (2) solid raw material hammermills, identified as EP3-1 and EP3-2, shall not exceed three and seventeen hundredths (3.17) pounds per hour, each; and
- (d) PM₁₀ emissions from the one (1) dried product hammermill, identified as EP3-3, shall not exceed nine and fifty-one hundredths (9.51) pounds per hour.

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

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

The operation of the three (3) direct, natural gas-fired product dryers, identified as EP1, EP2, and EP4, will each emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

Previously, HAPs for Dryers (EP1 and EP2) were estimated by assuming all VOC as VHAP. Because this process was the first of its kind in Indiana, testing was necessary to verify emission estimates for the dryers. The required testing, using EPA method TO-15 GC/MS, performed August 13, 2012 and accepted by IDEM, OAQ, determined that HAP emissions from the dryers were negligible. Consequently, the Case-by-Case MACT (326 IAC 2-4.1) HAP limit has been removed from the permit.

326 IAC 2-6 (Emission Reporting)

This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM₁₀ is less than 250 tons per year; and the potential to emit of CO, NO_x, and SO₂ is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2018, and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)

The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certification that submission to IDEM has satisfied reporting to

EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

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 continue to meet the following, unless otherwise stated in this permit:

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

326 IAC 6-2 (Particulate Emissions Limitations for Source of Indirect Heating)

The one (1) dryer (EP4) is not subject to the requirements of 326 IAC 6-2 because it is not a source of indirect heating. Pursuant to 326 IAC 1-2-19, combustion for indirect heating is defined as "the combustion of fuel to produce usable heat that is to be transferred through a heat-conducting materials barrier or by a heat storage medium to a material to be heated so that the material being heated is not contacted by, and adds no substance to the products of combustion".

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

- (a) Pursuant to 326 IAC 6-3-1(b)(14), the provisions of 326 IAC 6-3 are not applicable to manufacturing processes with potential emissions less than 0.551 pound per hour. Therefore, the Mixed Materials Blender is not subject to 326 IAC 6-3.
- (b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the following emission units shall not exceed pounds per hour limits when operating at the process weight rates as listed in the table below:

Emission Unit	Process Weight Rate (P) (ton/hr)	326 IAC 6-3-2 Allowable PM Rate (E) (lb/hr)	Uncontrolled PTE of PM (lb/hr)	Controlled PTE of PM (lb/hr)	Capable of Complying with 326 IAC 6-3-2?
EP3-1: Solids Hammermill #1	6	13.62	7.2	0.36	yes, without control
EP3-2: Solids Hammermill #2	6	13.62	7.2	0.36	yes, without control
EP1: Dryer #1	8.1	16.65	10.26	10.26	yes, without control
EP2: Dryer #2	8.1	16.65	10.26	10.26	yes, without control
EP4: Dryer #3	8.1	16.65	10.26	10.26	yes, without control
Conveying, Solids Material	12	21.67	0.73	0.73	yes, without control
Solids Materials Mixer	12	21.67	0.73	0.73	yes, without control
EP3-3: Dried Product Hammermill	18	28.43	21.600	1.08	yes, without control

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

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

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

Control equipment is not needed to comply with these limits for each of the emission units in the table.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The one (1) direct, natural gas fired product dryer (EP4) is not subject to the requirements of 326 IAC 326 IAC 7-1.1, because the PTE of SO₂ from the unit is less than twenty-five (25) tons per year and 10 pounds per hour.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The operation of the dryers (EP1, EP2, and EP4) will each emit less than twenty-five (25) tons per year VOC. Therefore, 326 IAC 8-1-6 does not apply.

A BACT analysis was previously completed for each of the two (2) existing product dryers (EP1 and EP2) for Part 70 Operating Permit No.: T009-30510-00025, issued on August 19, 2011. Because this process was the first of its kind in Indiana, testing was necessary to verify emission estimates for the dryers. The required testing using EPA method 25A, performed November 13-14, 2012 and accepted by IDEM, OAQ on January 30, 2013, determined the dryer VOC emission factor was 0.5346 lb/ton. Based on a maximum output capacity of each dryer of 6 ton/hr, the dryers are not subject to IAC 8-1-6 because they each have VOC potential emission of less than 25 ton/yr. Therefore, the VOC BACT limit [326 IAC 8-1-6] has been removed from the permit.

Compliance Determination and Monitoring Requirements

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

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

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

The three (3) hammermills, identified as EP3-1, EP3-2 and EP3-3, have applicable compliance monitoring conditions as specified below:

- (a) The Permittee shall record the pressure drop across each baghouse at least once per day when the associated hammermill unit is in operation. When, for any one reading, the pressure drop across a baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 0.30 and 5.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test.

- (b) In the event that bag failure has been observed:
- (1) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
 - (2) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouses for the three (3) hammermills, identified as EP3-1, EP3-2, and EP3-3, must operate properly to assure compliance with the 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) avoidance limits.

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

- (a) The baghouses for particulate control shall be in operation and controlling emissions from two (2) solid raw material hammermills (EP3-1 and EP3-2), and the dried product hammermill (EP3-3), at all times the units are in operation.
- (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.

Summary of Testing Requirements**					
Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing	Requirement
Dryer #1 (EP1) Dryer #2 (EP2) Dryer #3 (EP4)	Uncontrolled	Not later than 180-days after startup of EP4	PM, PM ₁₀ , and PM _{2.5}	One-time*	Emission Factor Verification

* The Permittee shall perform PM, PM10, and PM2.5 testing of the exhaust from one (1) of the three (3) product dryers (EP1, EP2, or EP4) utilizing methods approved by the Commissioner.

**No testing is being required to determine compliance with the PSD minor limits associated with the two (2) solids material hammermills (EP3-1 and EP3-2) or the one (1) dried product hammermill (EP3-3). In order to assure compliance with the PM limits from each of these units, the respective baghouses only require a 38% control efficiency. In order to assure compliance with the PM10 limits for each of these units, the respective baghouses only require a 12% control efficiency. The baghouses for EP3-1 and EP3-2 are rated at 95% control for PM, PM10, and PM2.5, and the baghouse for EP3-3 is rated at 94% control for PM, PM10, and PM2.5. Therefore, the permit will only contain a requirement to operate each baghouse at all times that its associated emission unit is in operation and will contain compliance monitoring requirements to assure that each baghouse is operating appropriately.

Proposed Changes

Section A - General Information

Source was changed to Minor under Section 112 of the Clean Air Act.

Section A - Emission Units and Pollution Control Equipment Summary

Unit descriptions were updated with proposed changes.

Section A - Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

Insignificant activities were updated with proposed changes.

Section D.1 - EMISSIONS UNIT OPERATION CONDITIONS

Emission unit descriptions were updated with proposed changes.

New Condition D.1.1 (PSD Minor Limits [326 IAC 2-2]) was added.

Renumbered Condition D.1.2 (Particulate Emission Limitations) was updated to add particulate limitations for the dryers, solids material conveyor, and solids materials mixer, and to modify the existing limitations for the hammermills.

Original Condition D1.2 (VOC BACT) was removed.

Original Condition D1.3 (Case by Case MACT) was removed.

Renumbered Condition D.1.3 (Preventive Maintenance Plan) was clarified.

Condition D.1.4 (Particulate Control) was added.

Condition D.1.5 (Testing Requirements) was added.

Condition D.1.6 (Parametric Monitoring) was added.

Condition D.1.7 (Broken or Failed Bag Detection) was added.

Condition D.1.8 (Record Keeping Requirements) was added.

The changes listed below have been made to Part 70 Operating Permit No.: 009-36739-00025. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

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

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Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Major Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories
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A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) Two (2) solid raw material hammermills, identified as EP3-1 and EP3-2, constructed in 2011 **and approved in 2016 for modification**, each with a maximum capacity of ~~4.96.0~~**18.0** tons per hour, with particulate emissions controlled by a baghouse, and exhausting internally.
- (b) ~~Two~~**Three (23)** direct, natural gas fired product dryers, identified as EP1 and EP2, constructed in 2011, **and EP4, approved in 2016 for construction**, each with a maximum input capacity of 8.1 tons per hour wet material received from the blender, each with a maximum output capacity of 6.0 tons per hour dried material, each with a maximum heat input capacity of 15 MMBtu/hr, with emissions uncontrolled, and exhausting through stacks EP-1, ~~and EP-2~~, **EP-4a, and EP-4b**.
- (c) One (1) dried product hammermill, identified as EP3-3, constructed in 2011 **and approved in 2016 for modification**, with a maximum capacity of ~~42.0~~**18.0** tons per hour, with particulate emissions controlled by a baghouse, and exhausting internally.

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

....

- (f) ~~Two~~**Three (23)** mixed material blenders, exhausting internally.
- (g) ~~Thirty-six~~**One hundred eight (36108)** storage bins for finished dried product, elevator/auger fed, and exhausting internally.

....

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) solid raw material hammermills, identified as EP3-1 and EP3-2, constructed in 2011 **and approved in 2016 for modification**, each with a maximum capacity of ~~4.06~~**6.0** tons per hour, with particulate emissions controlled by a baghouse, and exhausting internally.
- (b) ~~Two~~**Three (23)** direct, natural gas fired product dryers, identified as EP1 and EP2, constructed in 2011, **and EP4, approved in 2016 for construction**, each with a maximum input capacity of 8.1 tons per hour wet material received from the blender, each with a maximum output capacity of 6.0 tons per hour dried material, each with a maximum heat input capacity of 15 MMBtu/hr, with emissions uncontrolled, and exhausting through stacks EP-1, ~~and EP-2,~~ **EP-4a, and EP-4b.**
- (c) One (1) dried product hammermill, identified as EP3-3, constructed in 2011 **and approved in 2016 for modification**, with a maximum capacity of ~~42.01~~**18.0** tons per hour, with particulate emissions controlled by a baghouse, and exhausting internally.

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

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

D.1.1 PSD Minor Limits [326 IAC 2-2]

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

- (a) **PM emissions from the two (2) solid raw material hammermills, identified as EP3-1 and EP3-2, shall not exceed four and forty-five hundredths (4.45) pounds per hour, each;**
- (b) **PM emissions from the one (1) dried product hammermill, identified as EP3-3, shall not exceed thirteen and thirty hundredths (13.30) pounds per hour;**
- (c) **PM₁₀ emissions from the two (2) solid raw material hammermills, identified as EP3-1 and EP3-2, shall not exceed three and seventeen hundredths (3.17) pounds per hour, each; and**
- (d) **PM₁₀ emissions from the one (1) dried product hammermill, identified as EP3-3, shall not exceed nine and fifty-one hundredths (9.51) pounds per hour.**

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

D.1.42 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the

allowable particulate emission rate from the two (2) solid raw material hammermills (EP3-1 and EP3-2), and the dried product hammermill (EP3-3), and the three (3) dryers (EP1, EP2 and EP4) shall not exceed the values listed in the table below when operating at the listed process weight rates.

Emission Unit	Process Weight Rate (P) (ton/hr)	326 IAC 6-3-2 Allowable PM Rate (E) (lb/hr)
EP3-1: Solids Hammermill #1	4.06.0	13.6240.38
EP3-2: Solids Hammermill #2	4.06.0	13.6240.38
EP1: Dryer #1	8.1	16.65
EP2: Dryer #2	8.1	16.65
EP4: Dryer #3	8.1	16.65
Conveying, Solids Material	12	21.67
Solids Materials Mixer	12	21.67
EP3-3: Dried Product Hammermill	12.018.0	28.4321.67

....

~~D.1.2 VOC BACT [326 IAC 8-1-6]~~

~~Pursuant to T009-30510-00025 and 326 IAC 8-1-6, the Best Available Control Technology (BACT) for VOC emissions from the two product dryers (EP1 and EP2) shall be no control and VOC emissions shall not exceed 7.11 pounds per hour for each dryer.~~

~~D.1.3 Case-by-Case MACT [326 IAC 2-4.1]~~

~~Pursuant to T009-30510-00025 and 326 IAC 2-4.1, MACT for the two (2) product dryers (EP1 and EP2) shall be no control and total VHAP emissions shall not exceed 7.11 pounds per hour for each dryer.~~

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D.1.43 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for **these facilities and their control devices**~~the two product dryers (EP1 and EP2)~~. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plans required by this condition.

....

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

D.1.4 Particulate Control

- (a) In order to assure compliance with Condition D.1.1, the baghouses for particulate control shall be in operation and control emissions from two (2) solid raw material hammermills (EP3-1 and EP3-2), and the one (1) dried product hammermill (EP3-3), at all times the units are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly

notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.5 Testing Requirements [326 IAC 2-1.1-11]

No later than 180 days after the startup of the one (1) direct, natural gas fired product dryer, identified as EP4, in order to verify uncontrolled emission factors, the Permittee shall perform PM, PM10, and PM2.5 testing of the exhaust from one (1) of the three (3) product dryers (EP1, EP2, or EP4), utilizing methods approved by the Commissioner. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the testing required by this condition. PM10 and PM2.5 include filterable and condensable particulate matter.

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

D.1.6 Parametric Monitoring

In order to demonstrate the compliance status with Condition D.1.1, the Permittee shall record the pressure drop across each baghouse at least once per day when the associated hammermill unit is in operation. When, for any one reading, the pressure drop across a baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for these units is a pressure drop between 0.30 and 5.0 inches of water, unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.1.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.1.8 Record Keeping Requirements

- (a) In order to document the compliance status with Condition D.1.6, the Permittee shall maintain daily records of pressure drop across the baghouses. The Permittee shall include in its daily record when a pressure drop reading is not

taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

- (b) Section C – General Record Keeping Requirements contains the Permittee's obligation with regard to the record keeping required by this condition.**

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 009-36739-00025 and the operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 009-36748-00025. The staff recommends to the Commissioner that the Part 70 Significant Source Modification and Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Tamara Havics 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) 232-8219 or toll free at 1-800-451-6027 extension 2-8219.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations
Emission Summary**

Source Name: Naturally Recycled Proteins of Indiana, LLC
 Source Location: 4 McGeath Blvd, Montpelier, IN 47359
 Significant Permit Modification: 009-36748-00025
 Reviewer: Tamara Havics

Uncontrolled PTE (ton/yr)

Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Single HAP	Total HAPs
EP3-1: Solids Material Hammermill #1	31.54	15.77	15.77	-	-	-	-	-	-
EP3-2: Solids Material Hammermill #2	31.54	15.77	15.77	-	-	-	-	-	-
EP1: Dryer #1	44.94	57.03	53.61	-	-	21.10	-	-	-
EP2: Dryer #2	44.94	57.03	53.61	-	-	21.10	-	-	-
EP4: Dryer #3	44.94	57.03	53.61	-	-	21.10	-	-	-
EP1, EP2, and EP4 Combustion*	-	-	-	0.12	19.32	-	16.23	0.35 Hexane	0.36
EP3-3: Dried Product Hammermill	94.61	47.30	47.30	-	-	-	-	-	-
Insignificant Activities									
Truck Receiving, Solids Material	0.89	0.13	0.13	-	-	-	-	-	-
Bin Storage, Solids Material	1.31	0.33	0.06	-	-	-	-	-	-
Conveying, Solids Material	3.21	1.79	0.30	-	-	-	-	-	-
Solids Materials Mixer	3.21	1.79	0.30	-	-	-	-	-	-
Mixed Materials Blender #1	2.16	1.21	0.21	-	-	-	-	-	-
Mixed Materials Blender #2	2.16	1.21	0.21	-	-	-	-	-	-
Mixed Materials Blender #3	2.16	1.21	0.21	-	-	-	-	-	-
Finished Product Bins	1.97	0.50	0.09	-	-	-	-	-	-
Product Load-Out	0.26	0.06	0.06	-	-	-	-	-	-
Insignificant Combustion Sources	0.07	0.29	0.29	0.02	3.76	0.21	3.16	0.07 Hexane	0.07
Unpaved Roads	17.09	4.61	0.46	-	-	-	-	-	-
Total	309.91	258.42	241.53	0.14	23.09	63.52	19.39	0.42 Hexane	0.44

Unpaved Road emissions are not included towards the determination of PSD, emission offset, and Part 70 Permit applicability.

*The dryer process emissions include the combustion emissions for particulate and VOC.

Controlled PTE (ton/yr)

Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Single HAP	Total HAPs
EP3-1: Solids Material Hammermill #1	0.32	0.16	0.16	-	-	-	-	-	-
EP3-2: Solids Material Hammermill #2	0.32	0.16	0.16	-	-	-	-	-	-
EP1: Dryer #1	44.94	57.03	53.61	-	-	21.10	-	-	0.00
EP2: Dryer #2	44.94	57.03	53.61	-	-	21.10	-	-	0.00
EP4: Dryer #3	44.94	57.03	53.61	-	-	21.10	-	-	0.00
EP1, EP2, and EP4 Combustion*	-	-	-	0.12	19.32	-	16.23	0.35 Hexane	0.36
EP3-3: Dried Product Hammermill	0.95	0.47	0.47	-	-	-	-	-	-
Insignificant Activities									
Truck Receiving, Solids Material	0.89	0.13	0.13	-	-	-	-	-	-
Bin Storage, Solids Material	1.31	0.33	0.06	-	-	-	-	-	-
Conveying, Solids Material	3.21	1.79	0.30	-	-	-	-	-	-
Solids Materials Mixer	3.21	1.79	0.30	-	-	-	-	-	-
Mixed Materials Blender #1	2.16	1.21	0.21	-	-	-	-	-	-
Mixed Materials Blender #2	2.16	1.21	0.21	-	-	-	-	-	-
Mixed Materials Blender #3	2.16	1.21	0.21	-	-	-	-	-	-
Finished Product Bins	1.97	0.50	0.09	-	-	-	-	-	-
Product Load-Out	0.26	0.06	0.06	-	-	-	-	-	-
Insignificant Combustion Sources	0.07	0.29	0.29	0.02	3.76	0.21	3.16	0.07 Hexane	0.07
Unpaved Roads	17.09	4.61	0.46	-	-	-	-	-	-
Total	153.81	180.37	163.47	0.14	23.09	63.52	19.39	0.42 Hexane	0.44

*The dryer process emissions include the combustion emissions for particulate and VOC.

Unpaved Road emissions are not included towards the determination of PSD, emission offset, and Part 70 Permit applicability.

After Issuance of Permit PTE (ton/yr)

Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Single HAP	Total HAPs
EP3-1: Solids Material Hammermill #1	19.49	13.88	15.77	-	-	-	-	-	-
EP3-2: Solids Material Hammermill #2	19.49	13.88	15.77	-	-	-	-	-	-
EP1: Dryer #1	44.94	57.03	53.61	-	-	21.11	-	-	-
EP2: Dryer #2	44.94	57.03	53.61	-	-	21.11	-	-	-
EP4: Dryer #3	44.94	57.03	53.61	-	-	21.11	-	-	-
EP1, EP2, and EP4 Combustion*	-	-	-	0.12	19.32	-	16.23	0.35 Hexane	0.36
EP3-3: Dried Product Hammermill	58.25	41.65	47.30	-	-	-	-	-	-
Insignificant Activities									
Truck Receiving, Solids Material	0.89	0.13	0.13	-	-	-	-	-	-
Bin Storage, Solids Material	1.31	0.33	0.06	-	-	-	-	-	-
Conveying, Solids Material	3.21	1.79	0.30	-	-	-	-	-	-
Solids Materials Mixer	3.21	1.79	0.30	-	-	-	-	-	-
Mixed Materials Blender #1	2.16	1.21	0.21	-	-	-	-	-	-
Mixed Materials Blender #2	2.16	1.21	0.21	-	-	-	-	-	-
Mixed Materials Blender #3	2.16	1.21	0.21	-	-	-	-	-	-
Finished Product Bins	1.97	0.50	0.09	-	-	-	-	-	-
Product Load-Out	0.26	0.06	0.06	-	-	-	-	-	-
Insignificant Combustion Sources	0.07	0.29	0.29	0.02	3.76	0.21	3.16	0.07 Hexane	0.07
Unpaved Roads	17.09	4.61	0.46	-	-	-	-	-	-
Total	249.47	249.01	241.53	0.14	23.09	63.54	19.39	0.42 Hexane	0.44

*The dryer process emissions include the combustion emissions for particulate and VOC.

PM emissions from the two (2) solid raw material hammermills, identified as EP3-1 and EP3-2, shall not exceed 4.45 pounds per hour, each.

PM emissions from the one (1) dried product hammermill, identified as EP3-3, shall not exceed 13.30 pounds per hour.

PM10 emissions from the two (2) solid raw material hammermills, identified as EP3-1 and EP3-2, shall not exceed 3.17 pounds per hour, each.

PM10 emissions from the one (1) dried product hammermill, identified as EP3-3, shall not exceed 9.51 pounds per hour.

Unpaved Road emissions are not included towards the determination of PSD, emission offset, and Part 70 Permit applicability.

**Appendix A: Emission Calculations
Modification Summary**

Source Name: Naturally Recycled Proteins of Indiana, LLC
 Source Location: 4 McGeath Blvd, Montpelier, IN 47359
 Significant Permit Modification: 009-36748-00025
 Reviewer: Tamara Havics

New Units, Uncontrolled PTE (ton/yr)

Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Single HAP	Total HAPs
EP4 - Dryer #3	44.94	57.03	53.61	0.04	6.44	21.10	5.41	0.12	0.12
Mixed Materials Blender #3	2.16	1.21	0.21	-	-	-	-	-	-
Total PTE of New Units	47.10	58.23	53.82	0.04	6.44	21.10	5.41	0.12	0.12

Modified Units, Uncontrolled PTE (ton/yr)

Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Single HAP	Total HAPs
Before Modification*	120.75	221.29	216.85	0.10	16.64	28.31	13.98	62.6	62.28
After Modification	262.81	200.19	187.71	0.10	16.64	42.41	13.98	0.23	0.31
Increase to PTE of Modified Emission Units	142.06	0.00	0.00	0.00	0.00	14.10	0.00	0.00	0.00

Increase from Modification + New Units	189.16	58.23	53.82	0.04	6.44	35.21	5.41	0.12	0.12
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* From Appendix A for Part 70 Operating Permit Renewal No. T009-36059-00025, issued January 5, 2016.

**TSD Appendix A: Emission Calculations
Particulate Sources of Emissions**

Source Name: Naturally Recycled Proteins of Indiana, LLC
 Source Location: 4 McGeath Blvd, Montpelier, IN 47359
 Significant Permit Modification: 009-36748-00025
 Reviewer: Tamara Havics

Emission Unit	Maximum Capacity (ton/hr)	Uncontrolled Emission Factor (lb/ton)				Uncontrolled PTE (lb/hr)			Uncontrolled PTE (ton/yr)			Control Efficiency	Controlled PTE (ton/yr)			IAC 326 6-3-2 PTE Limit (lb/hr)
		PM	PM10	PM2.5	EF Ref	PM	PM10	PM2.5	PM	PM10	PM2.5		PM	PM10	PM2.5	
Truck Receiving, Solids Material	12	0.017	0.0025	0.0025	[1]	0.204	0.030	0.030	0.89	0.13	0.13	0%	0.89	0.13	0.13	-
Bin Storage, Solids Material	12	0.025	0.0063	0.0011	[3]	0.300	0.076	0.013	1.31	0.33	0.06	0%	1.31	0.33	0.06	-
Conveying, Solids Material	12	0.061	0.034	0.0058	[3]	0.732	0.408	0.070	3.21	1.79	0.30	0%	3.21	1.79	0.30	21.67
Solids Material Hammermill #1	6	1.2	0.6	0.6	[2]	7.200	3.600	3.600	31.54	15.77	15.77	99%	0.32	0.16	0.16	13.62
Solids Material Hammermill #2	6	1.2	0.6	0.6	[2]	7.200	3.600	3.600	31.54	15.77	15.77	99%	0.32	0.16	0.16	13.62
Solids Materials Mixer	12	0.061	0.034	0.0058	[3]	0.732	0.408	0.070	3.21	1.79	0.30	0%	3.21	1.79	0.30	21.67
Mixed Materials Blender #1	8.1	0.061	0.034	0.0058	[3]	0.494	0.275	0.047	2.16	1.21	0.21	0%	2.16	1.21	0.21	-
Mixed Materials Blender #2	8.1	0.061	0.034	0.0058	[3]	0.494	0.275	0.047	2.16	1.21	0.21	0%	2.16	1.21	0.21	-
Mixed Materials Blender #3	8.1	0.061	0.034	0.0058	[3]	0.494	0.275	0.047	2.16	1.21	0.21	0%	2.16	1.21	0.21	-
Dried Product Hammermill	18	1.2	0.6	0.6	[2]	21.600	10.800	10.800	94.61	47.30	47.30	99%	0.95	0.47	0.47	28.43
Finished Product Bins	18	0.025	0.0063	0.0011	[3]	0.450	0.113	0.020	1.97	0.50	0.09	0%	1.97	0.50	0.09	-
Product Load-Out	18	0.0033	0.0008	0.0008	[1]	0.059	0.014	0.014	0.26	0.06	0.06	0%	0.26	0.06	0.06	-

Note

Truck Receiving, Bin Storage, Conveying, and Mixer throughput of Solids Material is based on the combined maximum capacity of the Solids Material Hammermills (#1 and #2).
 Dried Product Hammermill, Finished Product Bins, and Product Load-Out throughput is based on the combined maximum capacity of the dryers, identified as EP1, EP2, and EP4.
 [1] Emission Factors from AP-42, Table 9.9.1-2 for Animal Feed Mills.
 [2] Emission Factors from AP-42, Table 9.9.1-2 for Animal Feed Mills. The Uncontrolled Emission Factor was estimated assuming 99% baghouse control (Uncontrolled EF = Controlled EF / (1 - 0.99))
 [3] Emission Factors from AP-42, Table 9.9.1-1 for Grain Elevators.
 In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the PM emissions from the two (2) solid raw material hammermills shall not exceed 4.45 lbs/hr; and the PM10 emissions shall not exceed 3.17 lbs/hr.
 In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the PM emissions from the one (1) dried product hammermill shall not exceed 13.30 lbs/hr; and the PM10 emissions shall not exceed 9.51 lbs/hr.

Methodology

Uncontrolled PTE (lb/hr) = Maximum Capacity (ton/hr) x Uncontrolled Emission Factor (lb/ton)
 Uncontrolled PTE (ton/yr) = Uncontrolled PTE (lb/hr) x (8760 hr/yr) x (1 ton/2000 lb)
 Controlled PTE (ton/yr) = Uncontrolled PTE (ton/yr) x (1 - Control Efficiency)

**TSD Appendix A: Emission Calculations
Dryers (EP1, EP2, and EP4)**

Source Name: Naturally Recycled Proteins of Indiana, LLC
 Source Location: 4 McGeath Blvd, Montpelier, IN 47359
 Significant Permit Modification: 009-36748-00025
 Reviewer: Tamara Havics

Dryer Combustion Emissions

Emission Factor in lb/MMCF			Criteria Pollutants					CO	
			PM	PM10	PM2.5	SO2	NOx		VOC**
			-	-	-	0.6	100.0	5.5	84.0
Emissions Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)						
EP1 - Dryer #1	15	128.824	-	-	-	0.039	6.441	0.354	5.411
EP2 - Dryer #2	15	128.824	-	-	-	0.039	6.441	0.354	5.411
EP4 - Dryer #3	15	128.824	-	-	-	0.039	6.441	0.354	5.411
Total			*	*	*	0.12	19.32	1.06	16.23

Emission Factors are from AP-42, Tables 1.4-1 and 1.4-2. NOx EF based on uncontrolled firing.

*The dryer process emissions calculated below include both the process emissions and the combustion emission.

Emission Factor in lb/MMCF			HAPs - Organics					HAPs - Metals					Total HAPs	
			Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel		
			2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03		
Emissions Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)											
EP1 - Dryer #1	15	128.824	1.4E-04	7.7E-05	4.8E-03	1.2E-01	2.2E-04	3.2E-05	7.1E-05	9.0E-05	2.4E-05	1.4E-04	1.2E-01	
EP2 - Dryer #2	15	128.824	1.4E-04	7.7E-05	4.8E-03	1.2E-01	2.2E-04	3.2E-05	7.1E-05	9.0E-05	2.4E-05	1.4E-04	1.2E-01	
EP4 - Dryer #3	15	128.824	1.4E-04	7.7E-05	4.8E-03	1.2E-01	2.2E-04	3.2E-05	7.1E-05	9.0E-05	2.4E-05	1.4E-04	1.2E-01	
Total			4.1E-04	2.3E-04	1.4E-02	3.5E-01	6.6E-04	9.7E-05	2.1E-04	2.7E-04	7.3E-05	4.1E-04	3.6E-01	

Emission Factors are from AP-42, Tables 1.4-3 and 1.4-4.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs are available in the AP-42 tables referenced above.

Total HAPs is the sum of all HAP emission factors listed in AP-42 Tables 1.4-3 and 1.4-4.

Dryer Process Emissions

Emission Unit	Maximum Output Capacity (ton/hr)	Emission Factor (lb/ton)				PTE (lb/hr)				PTE (ton/yr)				IAC 326 6-3-2 PTE Limit (lb/hr)
		PM*	PM10*	PM2.5*	VOC	PM	PM10	PM2.5	VOC	PM	PM10	PM2.5	VOC	PM
EP1 - Dryer #1	6	1.710	2.170	2.040	0.803	10.26	13.02	12.24	4.82	44.94	57.03	53.61	21.10	16.65
EP2 - Dryer #2	6	1.710	2.170	2.040	0.803	10.26	13.02	12.24	4.82	44.94	57.03	53.61	21.10	16.65
EP4 - Dryer #3	6	1.710	2.170	2.040	0.803	10.26	13.02	12.24	4.82	44.94	57.03	53.61	21.10	16.65

Methodology

VOC Emission Factor is based on an uncontrolled stack test conducted on November 13th and 14th, 2012, plus a 50% factor.

*PM, PM10, and PM2.5 Emission Factors are based on uncontrolled stack test conducted November 2015, with a 6 fold margin of safety.

*PM, PM10, and PM2.5 Emission factor verification testing is required not later than 180 days of start-up of Dryer #3 (EP-4)

PTE (lb/hr) = Maximum Output Capacity (ton/hr) x EF (lb/ton produced)

PTE (ton/yr) = PTE (lb/hr) x (8760 hr/yr) x (1 ton/2000 lb)

**TSD Appendix A: Emission Calculations
Natural Gas Combustion - Insignificant Activities**

Source Name: Naturally Recycled Proteins of Indiana, LLC
 Source Location: 4 McGeath Blvd, Montpelier, IN 47359
 Significant Permit Modification: 009-36748-00025
 Reviewer: Tamara Havics

Emission Factor in lb/MMCF			Criteria Pollutants						
			PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
			1.9	7.6	7.6	0.6	100.0	5.5	84.0
Emissions Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)						
Hi-Efficiency Furnace (Office)	0.135	1.159	0.001	0.004	0.004	0.000	0.058	0.003	0.049
Water Heater (Office)	0.05	0.429	0.000	0.002	0.002	0.000	0.021	0.001	0.018
Dryer Room Make-up Air Unit	5.775	49.597	0.047	0.188	0.188	0.015	2.480	0.136	2.083
Tanker Bay Radiant Heaters	0.4	3.435	0.003	0.013	0.013	0.001	0.172	0.009	0.144
Tank Area Radiant Heaters	0.6	5.153	0.005	0.020	0.020	0.002	0.258	0.014	0.216
Hotsy Model 1835 (Plant)	0.558	4.792	0.005	0.018	0.018	0.001	0.240	0.013	0.201
Hi-Efficiency Furnace (Truck Bldg Office)	0.135	1.159	0.001	0.004	0.004	0.000	0.058	0.003	0.049
Water Heater (Truck Bldg Office)	0.05	0.429	0.000	0.002	0.002	0.000	0.021	0.001	0.018
Shop Radiant Heaters	0.5	4.294	0.004	0.016	0.016	0.001	0.215	0.012	0.180
Shop - Hotsy Model 1835	0.558	4.792	0.005	0.018	0.018	0.001	0.240	0.013	0.201
Total			0.07	0.29	0.29	0.02	3.76	0.21	3.16

Emission Factors are from AP-42, Tables 1.4-1 and 1.4-2. NOx EF based on uncontrolled firing.

*PM includes filterable only. PM10 and PM2.5 emission factors are filterable and condensable PM combined.

Emission Factor in lb/MMCF			HAPs - Organics					HAPs - Metals					Total HAPs
			Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel	
			2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Emissions Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)										
Hi-Efficiency Furnace (Office)	0.135	1.159	1.2E-06	7.0E-07	4.3E-05	1.0E-03	2.0E-06	2.9E-07	6.4E-07	8.1E-07	2.2E-07	1.2E-06	1.1E-03
Water Heater (Office)	0.05	0.429	4.5E-07	2.6E-07	1.6E-05	3.9E-04	7.3E-07	1.1E-07	2.4E-07	3.0E-07	8.2E-08	4.5E-07	4.1E-04
Dryer Room Make-up Air Unit	5.775	49.597	5.2E-05	3.0E-05	1.9E-03	4.5E-02	8.4E-05	1.2E-05	2.7E-05	3.5E-05	9.4E-06	5.2E-05	4.7E-02
Tanker Bay Radiant Heaters	0.4	3.435	3.6E-06	2.1E-06	1.3E-04	3.1E-03	5.8E-06	8.6E-07	1.9E-06	2.4E-06	6.5E-07	3.6E-06	3.2E-03
Tank Area Radiant Heaters	0.6	5.153	5.4E-06	3.1E-06	1.9E-04	4.6E-03	8.8E-06	1.3E-06	2.8E-06	3.6E-06	9.8E-07	5.4E-06	4.9E-03
Hotsy Model 1835 (Plant)	0.558	4.792	5.0E-06	2.9E-06	1.8E-04	4.3E-03	8.1E-06	1.2E-06	2.6E-06	3.4E-06	9.1E-07	5.0E-06	4.5E-03
Hi-Efficiency Furnace (Truck Bldg Office)	0.135	1.159	1.2E-06	7.0E-07	4.3E-05	1.0E-03	2.0E-06	2.9E-07	6.4E-07	8.1E-07	2.2E-07	1.2E-06	1.1E-03
Water Heater (Truck Bldg Office)	0.05	0.429	4.5E-07	2.6E-07	1.6E-05	3.9E-04	7.3E-07	1.1E-07	2.4E-07	3.0E-07	8.2E-08	4.5E-07	4.1E-04
Shop Radiant Heaters	0.5	4.294	4.5E-06	2.6E-06	1.6E-04	3.9E-03	7.3E-06	1.1E-06	2.4E-06	3.0E-06	8.2E-07	4.5E-06	4.1E-03
Shop - Hotsy Model 1835	0.558	4.792	5.0E-06	2.9E-06	1.8E-04	4.3E-03	8.1E-06	1.2E-06	2.6E-06	3.4E-06	9.1E-07	5.0E-06	4.5E-03
Total			7.9E-05	4.5E-05	2.8E-03	6.8E-02	1.3E-04	1.9E-05	4.1E-05	5.3E-05	1.4E-05	7.9E-05	7.1E-02

Emission Factors are from AP-42, Tables 1.4-3 and 1.4-4.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs are available in the AP-42 tables referenced above.

Total HAPs is the sum of all HAP emission factors listed in AP-42 Tables 1.4-3 and 1.4-4.

Methodology

Heating Value of Natural Gas is assumed to be 1020 MMBtu/MMCF

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) * 8,760 hrs/yr * 1 MMCF/1,020 MMBtu

Potential Emission (tons/yr) = Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * (1 ton/2,000 lb)

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

Source Name: Naturally Recycled Proteins of Indiana, LLC
 Source Location: 4 McGeath Blvd, Montpelier, IN 47359
 Significant Permit Modification: 009-36748-00025
 Reviewer: Tamara Havics

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) Inbound Product - Full	1.0	23.3	23.3	40.0	933.1	1082	0.205	4.8	1745.5
Vehicle (entering plant) (one-way trip) Inbound Product - Empty	1.0	23.3	23.3	15.0	349.9	1082	0.205	4.8	1745.5
Vehicle (entering plant) (one-way trip) Outbound Product - Full	1.0	17.3	17.3	40.0	691.2	1082	0.205	3.5	1293.0
Vehicle (entering plant) (one-way trip) Outbound Product - Empty	1.0	17.3	17.3	15.0	259.2	1082	0.205	3.5	1293.0
Totals			81.2		2233.4			16.6	6077.0

Average Vehicle Weight Per Trip = $\frac{27.5}{0.21}$ tons/trip
 Average Miles Per Trip = $\frac{27.5}{0.21}$ miles/trip

Unmitigated Emission Factor, $E_f = k \left[\frac{s}{12} \right]^a \left[\frac{W}{3} \right]^b$ (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 =	6.4	6.4	6.4	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
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, $E_{ext} = E \cdot [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, $E_{ext} = \frac{E \cdot [(365 - P)/365]}{125}$ days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	8.55	2.31	0.23	lb/mile
Mitigated Emission Factor, $E_{ext} =$	5.62	1.52	0.15	lb/mile
Dust Control Efficiency =	0%	0%	0%	

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip) Inbound Product - Full	7.46	2.02	0.20	4.91	1.32	0.13	4.91	1.32	0.13
Vehicle (entering plant) (one-way trip) Inbound Product - Empty	7.46	2.02	0.20	4.91	1.32	0.13	4.91	1.32	0.13
Vehicle (entering plant) (one-way trip) Outbound Product - Full	5.53	1.49	0.15	3.64	0.98	0.10	3.64	0.98	0.10
Vehicle (entering plant) (one-way trip) Outbound Product - Empty	5.53	1.49	0.15	3.64	0.98	0.10	3.64	0.98	0.10
Totals	25.99	7.02	0.70	17.09	4.61	0.46	17.09	4.61	0.46

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

Methodology to estimate number of trips

All raw materials delivered and all of the finished product shipped will be transported by semi-tank wagon or semi-trailer.

Incoming raw material trucks and outgoing product trucks (full): 40 tons
 Outgoing raw material trucks and ingoing product trucks (empty): 15 tons
 Average truck weight: 27.5 tons = (40 + 15) / 2
 Haul road length (one-way): 0.205 miles

VMT Estimate

Each of the 2 dryers can handle 8.1 tons/hr of wet material input, so assume that the incoming weight is based on this:
 Inbound Materials = 212868 ton/yr = (8.1 ton/hr/dryer) x (3 dryers) x (8760 hr/yr)
 Each of the 2 dryers can output 6.0 tons/hr of dry material, so assume that the outgoing weight is based on this:
 Outbound Materials = 157680 ton/yr = (6.0 ton/hr/dryer) x (3 dryers) x (8760 hr/yr)
 Number of truck loads to handle inbound materials: 8514.72 loads/yr = Inbound materials (ton/yr) / (full truck wt (ton) - empty truck wt (ton))
 Number of truck loads to handle outbound materials: 6307.2 loads/yr = Outbound materials (ton/yr) / (full truck wt (ton) - empty truck wt (ton))



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

March 30, 2016

Alan Koch
Naturally Recycled Proteins of Indiana, LLC
PO Box 394
Johnston, IA 50131-0394

Re: Public Notice
Naturally Recycled Proteins of Indiana, LLC
Permit Level: Title V
Permit Number: 009-36748-00025 & 009-36739-00025

Dear Mr. Koch:

Enclosed is a copy of your draft Title V, 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 News Times in Hartford City, Indiana publish the abbreviated version of the public notice no later than Monday April 4, 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 Montpelier Harrison Twp Public Library, 301 S Main Street in Montpelier, 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 Tamara Havics, 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 2-8219 or dial (317) 232-8219

Sincerely,
Catherine Denny
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



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Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

March 30, 2016

News Times
123 South Jefferson Street
P.O. Box 690
Hartford City, Indiana 47348

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Naturally Recycled Proteins of IN in Blackford 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 Monday, April 4, 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 Catherine Denny at 800-451-6027 and ask for extension 4-5256 or dial 317-234-5256

Sincerely,
Catherine Denny
Permit Branch
Office of Air Quality

Permit Level: Title V
Permit Number: 009-36748-00025 & 009-36739-00025

Enclosure

PN Newspaper.dot 2/17/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

March 30, 2016

To: Montpelier Harrison Twp 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: Naturally Recycled Proteins of Indiana
Permit Number: 009-36748-00025 & 009-36739-00025

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 2/17/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

March 30, 2016
Naturally Recycled Proteins of Indiana
009-36748-00025 & 009-36739-00025

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

Mail Code 61-53

IDEM Staff	CDENNY 3/30/2016 Naturally Recycled Proteins of IN 009-36748-00025 & 009-36739-00025 (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		Alan Koch Naturally Recycled Proteins of Indiana, LLC PO Box 394 Johnston IA 50131-0394 (Source CAATS)									
2		Blackford County Commissioners 110 West Washington Street Hartford City IN 47348 (Local Official)									
3		Blackford County Health Department 506 E. Van Cleve Street Hartford City IN 47348-1846 (Health Department)									
4		Ms. Mary Shipley 10968 E 100 S Marion IN 46953 (Affected Party)									
5		Glen & Judith Van Camp 6725 N. Blackford Ave Montpelier IN 47359 (Affected Party)									
6		Montpelier Harrison Twp Public Library 301 S Main St Montpelier IN 47359-1428 (Library)									
7		Daryl & Lois Hoffman 7750 N. CR 75 E Lizton IN 46149 (Affected Party)									
8		Mr. Dan Baughey 103 Lakeview Drive Hartford City IN 47348 (Affected Party)									
9		Montpelier City Council and Mayors Office 300 W. Huntington St. Montpelier IN 47359 (Local Official)									
10		Cathie McCammon 3779 East State Rd 18 Montpelier IN 47359 (Affected Party)									
11		Shirley Glessner 6827 N. Blackford Ave Montpelier IN 47359 (Affected Party)									
12		Wendell & Brenda Bonewit 6891 N 400 E Montpelier IN 47359 (Affected Party)									
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