



# 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](http://www.idem.IN.gov)

Michael R. Pence  
*Governor*

Carol S. Comer  
*Commissioner*

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and  
Minor Source Operating Permit (MSOP)

for Scott Pet, Inc. in Parke County

MSOP No.: M121-37208-00021

The Indiana Department of Environmental Management (IDEM) has received an application from Scott Pet, Inc., located at 1543 N US Hwy 41, Rockville, Indiana 47872, for a new source construction and MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Scott Pet, Inc. to construct and operate an existing stationary bird seed processing facility.

The applicant has constructed and operated new equipment that emits air pollutants. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to continue operating.

IDEM is aware that the stationary bird seed processing facility has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft MSOP contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

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

Rockville Public Library  
106 N Market St.  
Rockville, IN 47872

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 30<sup>th</sup> 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 M121-37208-00021 in all correspondence.

**Comments should be sent to:**

Brian Wright  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 4-6544  
Or dial directly: (317) 234-6544  
Fax: (317) 232-6749 attn: Brian Wright  
E-mail: [Bwright1@idem.IN.gov](mailto:Bwright1@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 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Brian Wright of my staff at the above address.



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



# Indiana Department of Environmental Management

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**Michael R. Pence**  
*Governor*

**DRAFT**

**Carol S. Comer**  
*Commissioner*

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

**Scott Pet, Inc.  
1543 N US Hwy 41  
Rockville, Indiana 47872**

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No. M121-37208-00021	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date:

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## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary bird seed processing facility.

Source Address:	1543 N US Hwy 41, Rockville, Indiana 47872
General Source Phone Number:	765-569-4684
SIC Code:	2048 (Prepared Feed and Feed Ingredients for Animal and Fowls, Except Dogs and Cats)
County Location:	Parke
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) receiving pit, constructed in 1996, with a maximum grain throughput of 110 tons per hour and a bottlenecked throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.
- (b) One (1) enclosed material elevator and conveying system, constructed in 2005, with a maximum grain throughput of 50 tons per hour and a bottlenecked throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.
- (c) Five (5) bulk storage bins, constructed in 2005, with a total maximum grain throughput of 50 tons per hour and a total bottlenecked throughput of 24.3 tons per hour, uncontrolled, consisting of the following.

Emission Unit ID	Maximum Packed Storage Capacity (bushels)	Stack ID
B25	67,563	V25
B26	67,563	V26
B27	10,912	V27
B28	106,284	V28
B29	389,532	V29

- (d) One (1) grain column dryer, identified as GD, constructed in 2015, with maximum heat input rate of 21.1 MMBtu/hr, a maximum grain throughput of 56 tons per hour and a bottlenecked grain throughput rate of 24.3 tons per hour, and exhausting through stack S-GD.
- (e) One (1) grain cleaning system with vibrating screener, identified as VS, constructed in 2006, with a maximum grain throughput of 28 tons per hour and a bottlenecked throughput of 24.3 tons per hour, with a cyclone for particulate control, and exhausting through vent S-VS.

- (f) Transfer to intermediate bins, constructed in 2005, with a maximum grain throughput of 50 tons per hour and a bottlenecked throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.
- (g) Twenty-four (24) intermediate storage bins, constructed in 1975, with a total maximum grain throughput of 50 tons per hour and a total bottlenecked throughput of 24.3 tons per hour, uncontrolled, consisting of the following.

Emission Unit ID	Maximum Packed Storage Capacity (bushels)	Stack ID
B1	5,529	V1
B2	5,529	V2
B3	11,098	V3
B4	11,098	V4
B5	11,098	V5
B6	11,098	V6
B7	11,098	V7
B8	11,098	V8
B9	1,880	V9
B10	3,581	V10
B11	1,880	V11
B12	3,581	V12
B13	3,581	V13
B14	1,880	V14
B15	1,880	V15
B16	3,581	V16
B17	11,098	V17
B18	11,098	V18
B19	11,098	V19
B20	11,098	V20
B21	11,098	V21
B22	11,098	V22
B23	5,529	V23
B24	5,529	V24

- (h) Two (2) enclosed aspirator grain cleaners, identified as ASP1 and ASP2, constructed in 1998, with a total maximum grain throughput of 36 tons per hour and a total bottlenecked throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.
- (i) Twenty-three (23) tertiary storage bins, constructed in 1970, with a total maximum grain throughput of 36 tons per hour and a total bottlenecked throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.
- (j) One (1) ribbon mixer, identified as RB, constructed in 2004, with a maximum grain throughput of 15 tons per hour, uncontrolled, and exhausting indoors.
- (k) One (1) corn cracker, identified as CC, constructed in 2015, with a maximum grain throughput of 35 tons per hour and a bottlenecked throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.
- (l) Two (2) bagging operations, identified as BAG1 and BAG2, constructed in 1998, with a total maximum grain throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.

- (m) One (1) fumigation operation, identified as FUM, constructed in 2011, with a usage rate of 56,550 grams of fumigation product per month, uncontrolled, and exhausting through vent S-FUM.
- (n) Two (2) welding stations, constructed in 1998, each with a maximum usage rate of 0.25 pounds per hour of electrode.
- (o) One (1) acetylene cutting operation, constructed in 1998, with a maximum cutting rate of 4 inches per hour.
- (p) One (1) maintenance metal grinding operation, constructed in 1998, with a maximum capacity of 75 pounds per hour.
- (q) Natural gas-fired space heaters as follows:

Unit ID	Heat Input Capacity (MMBtu/hr)	Construction Date
Maintenance Heater	0.0498	1998
Maintenance Heater	0.120	1998
Maintenance Heater	0.100	1998
Maintenance Heater	0.100	1998
Seed Heater	0.320	2006
Seed Heater	0.121	2006
Front Dock Heater	0.290	2015
B2 Heater	0.310	2015
B2 Heater	0.310	2015
B3 Heater	0.320	2015
B4 Heater	0.288	2015
B7 Heater	0.202	2015
Traffic Office Heater	0.08	2015

- (r) One (1) electric powered emergency fire pump.
- (s) One (1) videojet printer for label printing, constructed in 2011, with a maximum VOC and HAP input rate of one (1) ton per year each.
- (t) Paved and unpaved roads.



## SECTION B GENERAL CONDITIONS

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

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

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

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

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

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

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

### B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

---

- (a) This permit, M121-37208-00021, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

### B.6 Enforceability

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

**B.7 Severability**

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

**B.8 Property Rights or Exclusive Privilege**

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

**B.9 Duty to Provide Information**

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

**B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

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

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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- (a) All terms and conditions of permits established prior to M121-37208-00021 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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

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

---

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

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

B.16 Source Modification Requirement

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

B.17 Inspection and Entry  
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

**B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
  
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
  
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

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

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- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
  
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.20 Credible Evidence [326 IAC 1-1-6]**

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

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

**Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]**

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

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

**C.2 Permit Revocation [326 IAC 2-1.1-9]**

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

**C.3 Opacity [326 IAC 5-1]**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control

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

- (f) Demolition and Renovation  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Licensed Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

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

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

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.



- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

### **Corrective Actions and Response Steps**

#### **C.13 Response to Excursions or Exceedances**

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

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

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

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

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

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

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- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

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

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

**SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

- (a) One (1) receiving pit, constructed in 1996, with a maximum grain throughput of 110 tons per hour and a bottlenecked throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.
- (b) One (1) enclosed material elevator and conveying system, constructed in 2005, with a maximum grain throughput of 50 tons per hour and a bottlenecked throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.
- (c) Five (5) bulk storage bins, constructed in 2005, with a total maximum grain throughput of 50 tons per hour and a total bottlenecked throughput of 24.3 tons per hour, uncontrolled, consisting of the following.

Emission Unit ID	Maximum Packed Storage Capacity (bushels)	Stack ID
B25	67,563	V25
B26	67,563	V26
B27	10,912	V27
B28	106,284	V28
B29	389,532	V29

- (d) One (1) grain column dryer, identified as GD, constructed in 2015, with maximum heat input rate of 21.1 MMBtu/hr, a maximum grain throughput of 56 tons per hour and a bottlenecked grain throughput rate of 24.3 tons per hour, and exhausting through stack S-GD.
- (e) One (1) grain cleaning system with vibrating screener, identified as VS, constructed in 2006, with a maximum grain throughput of 28 tons per hour and a bottlenecked throughput of 24.3 tons per hour, with a cyclone for particulate control, and exhausting through vent S-VS.
- (f) Transfer to intermediate bins, constructed in 2005, with a maximum grain throughput of 50 tons per hour and a bottlenecked throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.
- (g) Twenty-four (24) intermediate storage bins, constructed in 1975, with a total maximum grain throughput of 50 tons per hour and a total bottlenecked throughput of 24.3 tons per hour, uncontrolled, consisting of the following.

Emission Unit ID	Maximum Packed Storage Capacity (bushels)	Stack ID
B1	5,529	V1
B2	5,529	V2
B3	11,098	V3
B4	11,098	V4
B5	11,098	V5
B6	11,098	V6
B7	11,098	V7
B8	11,098	V8
B9	1,880	V9
B10	3,581	V10
B11	1,880	V11
B12	3,581	V12
B13	3,581	V13

B14	1,880	V14
B15	1,880	V15
B16	3,581	V16
B17	11,098	V17
B18	11,098	V18
B19	11,098	V19
B20	11,098	V20
B21	11,098	V21
B22	11,098	V22
B23	5,529	V23
B24	5,529	V24

- (h) Two (2) enclosed aspirator grain cleaners, identified as ASP1 and ASP2, constructed in 1998, with a total maximum grain throughput of 36 tons per hour and a total bottlenecked throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.
- (i) Twenty-three (23) tertiary storage bins, constructed in 1970, with a total maximum grain throughput of 36 tons per hour and a total bottlenecked throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.
- (j) One (1) ribbon mixer, identified as RB, constructed in 2004, with a maximum grain throughput of 15 tons per hour, uncontrolled, and exhausting indoors.
- (k) One (1) corn cracker, identified as CC, constructed in 2015, with a maximum grain throughput of 35 tons per hour and a bottlenecked throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.
- (l) Two (2) bagging operations, identified as BAG1 and BAG2, constructed in 1998, with a total maximum grain throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.

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

**Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]**

**D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]**

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

Emission Unit ID	Process Weight Rate, tons/hr	326 IAC 6-3-2 Allowable PM Emission Rate, lb/hr
Receiving Pit - Straight Truck	110	52.24
Enclosed Material Elevator and Conveying System	50	44.58
Bulk Storage Bins	50, total	44.58, total
Dryer	56	45.64
Grain Cleaning (Vibrating Screener)	28	38.23
Transfer to Intermediate Bins	50, total	44.58, total
Intermediate Storage Bins	50, total	44.58, total
Enclosed Aspirator Grain Cleaners	36, total	41.57, total
Tertiary Bins (used to combine ingredients)	36, total	41.57, total
Ribbon Mixer	15	25.16
Corn Cracker	35	41.32
Bagging Operation	24	34.76

The pound per hour particulate emission rates shown in the table above were calculated with the following equations:

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:

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

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

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

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

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

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	Scott Pet, Inc.
<b>Address:</b>	1543 N US Hwy 41
<b>City:</b>	Rockville, Indiana 47872
<b>Phone #:</b>	765-569-4684
<b>MSOP #:</b>	M121-37208-00021

I hereby certify that Scott Pet, Inc. is :

still in operation.

no longer in operation.

I hereby certify that Scott Pet, Inc. is :

in compliance with the requirements of MSOP M121-37208-00021.

not in compliance with the requirements of MSOP M121-37208-00021.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2



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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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

Scott Pet, Inc.  
1543 N US Hwy 41  
Rockville, Indiana 47872

Affidavit of Construction

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

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Scott Pet, Inc. 1543 N US Hwy 41, Rockville, Indiana 47872, has constructed and will operate a bird seed processing facility on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on May 20, 2016 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M121-37208-00021, Plant ID No. 121-00021 issued on \_\_\_\_\_.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature \_\_\_\_\_  
Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana  
on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_. My Commission expires: \_\_\_\_\_.

Signature \_\_\_\_\_  
Name \_\_\_\_\_ (typed or printed)

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

Technical Support Document (TSD) for a New Source Construction and Minor Source  
Operating Permit (MSOP)

**Source Description and Location**

**Source Name:** Scott Pet, Inc.  
**Source Location:** 1543 N US Hwy 41, Rockville, IN 47872  
**County:** Parke  
**SIC Code:** 2048 (Prepared Feed and Feed Ingredients for Animal and Fowls, Except Dogs and Cats)  
**Operation Permit No.:** M121-37208-00021  
**Permit Reviewer:** Brian Wright

On May 20, 2016, the Office of Air Quality (OAQ) received an application from Scott Pet, Inc. related to the construction and continued operation of an existing stationary bird seed processing facility.

**Existing Approvals**

There have been no previous approvals issued to this source.

**County Attainment Status**

The source is located in Parke County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

<sup>1</sup>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<sub>x</sub>) 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<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Parke County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
 Parke County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**  
 Parke County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

### Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Scott Pet, Inc. on May 20, 2016, relating to relating to the construction and operation of an existing stationary bird seed processing facility.

### Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

- (a) One (1) receiving pit, constructed in 1996, with a maximum grain throughput of 110 tons per hour and a bottlenecked throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.
- (b) One (1) enclosed material elevator and conveying system, constructed in 2005, with a maximum grain throughput of 50 tons per hour and a bottlenecked throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.
- (c) Five (5) bulk storage bins, constructed in 2005, with a total maximum grain throughput of 50 tons per hour and a total bottlenecked throughput of 24.3 tons per hour, uncontrolled, consisting of the following.

Emission Unit ID	Maximum Packed Storage Capacity (bushels)	Stack ID
B25	67,563	V25
B26	67,563	V26
B27	10,912	V27
B28	106,284	V28
B29	389,532	V29

- (d) One (1) grain column dryer, identified as GD, constructed in 2015, with maximum heat input rate of 21.1 MMBtu/hr, a maximum grain throughput of 56 tons per hour and a bottlenecked grain throughput rate of 24.3 tons per hour, and exhausting through stack S-GD.
- (e) One (1) grain cleaning system with vibrating screener, identified as VS, constructed in 2006, with a maximum grain throughput of 28 tons per hour and a bottlenecked throughput of 24.3 tons per hour, with a cyclone for particulate control, and exhausting through vent S-VS.
- (f) Transfer to intermediate bins, constructed in 2005, with a maximum grain throughput of 50 tons per hour and a bottlenecked throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.
- (g) Twenty-four (24) intermediate storage bins, constructed in 1975, with a total maximum grain throughput of 50 tons per hour and a total bottlenecked throughput of 24.3 tons per hour, uncontrolled, consisting of the following.

Emission Unit ID	Maximum Packed Storage Capacity (bushels)	Stack ID
B1	5,529	V1
B2	5,529	V2
B3	11,098	V3
B4	11,098	V4
B5	11,098	V5
B6	11,098	V6
B7	11,098	V7
B8	11,098	V8
B9	1,880	V9
B10	3,581	V10
B11	1,880	V11
B12	3,581	V12
B13	3,581	V13
B14	1,880	V14
B15	1,880	V15
B16	3,581	V16
B17	11,098	V17
B18	11,098	V18
B19	11,098	V19
B20	11,098	V20
B21	11,098	V21
B22	11,098	V22
B23	5,529	V23
B24	5,529	V24

- (h) Two (2) enclosed aspirator grain cleaners, identified as ASP1 and ASP2, constructed in 1998, with a total maximum grain throughput of 36 tons per hour and a total bottlenecked throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.
- (i) Twenty-three (23) tertiary storage bins, constructed in 1970, with a total maximum grain throughput of 36 tons per hour and a total bottlenecked throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.
- (j) One (1) ribbon mixer, identified as RB, constructed in 2004, with a maximum grain throughput of 15 tons per hour, uncontrolled, and exhausting indoors.
- (k) One (1) corn cracker, identified as CC, constructed in 2015, with a maximum grain throughput of 35 tons per hour and a bottlenecked throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.
- (l) Two (2) bagging operations, identified as BAG1 and BAG2, constructed in 1998, with a total maximum grain throughput of 24.3 tons per hour, uncontrolled, and exhausting indoors.
- (m) One (1) fumigation operation, identified as FUM, constructed in 2011, with a usage rate of 56,550 grams of fumigation product per month, uncontrolled, and exhausting through vent S-FUM.
- (n) Two (2) welding stations, constructed in 1998, each with a maximum usage rate of 0.25 pounds per hour of electrode.
- (o) One (1) acetylene cutting operation, constructed in 1998, with a maximum cutting rate of 4 inches per hour.

- (p) One (1) maintenance metal grinding operation, constructed in 1998, with a maximum capacity of 75 pounds per hour.
- (q) Natural gas-fired space heaters as follows:

Unit ID	Heat Input Capacity (MMBtu/hr)	Construction Date
Maintenance Heater	0.0498	1998
Maintenance Heater	0.120	1998
Maintenance Heater	0.100	1998
Maintenance Heater	0.100	1998
Seed Heater	0.320	2006
Seed Heater	0.121	2006
Front Dock Heater	0.290	2015
B2 Heater	0.310	2015
B2 Heater	0.310	2015
B3 Heater	0.320	2015
B4 Heater	0.288	2015
B7 Heater	0.202	2015
Traffic Office Heater	0.08	2015

- (r) One (1) electric powered emergency fire pump.
- (s) One (1) videojet printer for label printing, constructed in 2011, with a maximum VOC and HAP input rate of one (1) ton per year, each.
- (t) Paved and unpaved roads.

**Enforcement Issues**

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

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – MSOP**

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

Pollutant	Potential To Emit (tons/year)
PM	159.15
PM10 <sup>(1)</sup>	55.01
PM2.5	17.40
SO <sub>2</sub>	0.06
NO <sub>x</sub>	10.18
VOC	1.56
CO	8.55

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

HAPs	Potential To Emit (tons/year)
Phosphine	0.48
Hexane	0.18
Manganese	0.04
Glycol Ethers or Methanol	1.00
<b>TOTAL HAPs</b>	<b>1.72</b>

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM2.5 is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

**Federal Rule Applicability Determination**

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60, Subpart QQ (326 IAC 12), are not included in the permit for the videojet printer, since it does not meet the definition of a rotogravure printing unit, in that an engraved cylinder (AKA "Gravure cylinder") is not used, and the ink is not applied to a continuous web or substrate.
- (b) The requirements of the New Source Performance Standard for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR (326 IAC 12), are not included in the permit for the videojet printer, since this source does not manufacture of pressure sensitive tape and/or label materials.
- (c) The requirements of the New Source Performance Standard for Flexible Vinyl and Urethane Coating and Printing, 40 CFR 60, Subpart FFF (326 IAC 12), are not included in the permit for the videojet printer, since it does not meet the definition of a rotogravure printing unit, in that an engraved cylinder (AKA "Gravure cylinder") is not used, and the ink is not used to print or coat flexible vinyl or urethane products.
- (d) The requirements of the New Source Performance Standard for Polymeric Coating of Supporting Substrates Facilities, 40 CFR 60, Subpart VVV (326 IAC 12), are not included in the permit for the

videojet printer, since this source applies ink to paper or plastic, and not elastomers, polymers, or prepolymers to a supporting web other than paper, plastic film, metallic foil, or metal coil.

- (e) The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60, Subpart DD (326 IAC 12), are not included in the permit, because the source does not include a grain terminal elevator with a permanent storage capacity of more than 2.5 million U.S. bushels or a grain storage elevator with a permanent grain storage capacity of 1 million bushels. The facility manufactures bird seed that is not intended for human consumption. The following definitions are included in 40 CFR 60.301:
- (1) Grain elevator means any plant or installation at which grain is unloaded, handled, cleaned, dried, stored, or loaded.
  - (2) Grain terminal elevator means any grain elevator which has a permanent storage capacity of more than 88,100 m<sup>3</sup> (ca. 2.5 million U.S. bushels), except those located at animal food manufacturers, pet food manufacturers, cereal manufacturers, breweries, and livestock feedlots.
  - (3) Grain storage elevator means any grain elevator located at any wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean oil extraction plant which has a permanent grain storage capacity of 35,200 m<sup>3</sup> (ca. 1 million bushels).
- (b) The requirements of the New Source Performance Standard for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR (326 IAC 12), are not included in the permit, since the videojet printer is not a coating line as defined by 40 CFR 60.441.
- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Printing and Publishing Industry, 40 CFR 63, Subpart KK (326 IAC 20-18), are not included in the permit for the videojet printer, since it does not meet the definition of a publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses, as defined under §63.822, and is not a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.2.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paper and Other Web Coating, 40 CFR 63, Subpart JJJJ (326 IAC 20-65), are not included in this permit, since the videojet printer is not a web coating line as defined by 40 CFR 63.3310 and is not located at a major source of HAPs.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Printing, Coating, and Dyeing of Fabrics and Other Textiles, 40 CFR 63, Subpart OOOO (40) (326 IAC 20-77), are not included in the permit the videojet printer, since it applies ink to paper or plastic, and not fabric and other textiles, and is not a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.2.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (326 IAC 20-95), are not included in the permit, since the grain dryer is not located at a major source of HAPs.
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ ,



are not included in this permit, since the grain dryer and natural gas combustion units are not boilers as defined by 40 CFR 63.11237.

- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Prepared Feeds Manufacturing, 40 CFR 63, Subpart DDDDDDD, are not included in the permit, since this source does not own or operate a prepared feeds manufacturing facility that uses materials containing chromium or materials containing manganese.
- (l) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

#### Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability Determination</b>
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The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))  
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This existing source is not a major stationary source, under PSD (326 IAC 2-2), because:
  - (1) The potential to emit of all PSD regulated pollutants are less than 250 tons per year,
  - (2) This source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
 The source is subject to the requirements of 326 IAC 6-4, because the paved and unpaved roads have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
 The source is not subject to the requirements of 326 IAC 6-5, because the paved and unpaved roads have potential fugitive particulate emissions less than 25 tons per year.
- (h) 326 IAC 12 (New Source Performance Standards)  
 See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 20 (Hazardous Air Pollutants)  
 See Federal Rule Applicability Section of this TSD.

Material Handling

- (j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
 The units listed below are subject to the requirements of 326 IAC 6-3-2, since they are manufacturing processes and each have potential particulate emissions greater than 0.551 pounds per hour. Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following units shall not exceed the allowable emissions rate specified in the table below:

Emission Unit ID	Process Weight Rate, tons/hr	326 IAC 6-3-2 Allowable PM Emission Rate, lb/hr	Uncontrolled PM Emissions, lb/hr
Receiving Pit - Straight Truck	110	52.24	19.80
Enclosed Material Elevator and Conveying System	50	44.58	3.05
Bulk Storage Bins	50, total	44.58, total	1.25, total
Dryer	56	45.64	12.32
Grain Cleaning (Vibrating Screener)	28	38.23	2.10
Transfer to Intermediate Bins	50, total	44.58, total	3.05, total
Intermediate Storage Bins	50, total	44.58, total	1.25, total
Enclosed Aspirator Grain Cleaners	36, total	41.57, total	2.20, total
Tertiary Bins (used to combine ingredients)	36, total	41.57, total	0.90, total
Ribbon Mixer	15	25.16	0.92
Corn Cracker	35	41.32	5.60
Bagging Operation	24	34.76	1.48

The pound per hour particulate emission rates shown in the table above were calculated with the following equations:

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:

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

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

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

Based on the potential to emit calculations, a control device is not needed for each of the units at this source in order to comply with the 326 IAC 6-3-2 allowable PM emissions rate.

#### Fumigation

- (k) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The fumigation operation is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from the fumigation operation is less than twenty-five (25) tons per year.

#### Welding, Cutting, and Grinding

- (l) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(9), the two (2) welding stations are not subject to the requirements of 326 IAC 6-3-2, since the stations each consume less than 625 pounds per day of wire.

Pursuant to 326 IAC 326 IAC 6-3-1(b)(10), the acetylene cutting operation is not subject to the requirements of 326 IAC 6-3-2, since the operation cuts less than 3,400 inches per hour of stock.

Pursuant to 326 IAC 6-3-1(b)(14), the grinding operation is not subject to the requirements of 326 IAC 6-3-2, since the operation has potential particulate emissions of less than 0.551 pounds per hour.

#### Natural Gas Combustion

- (m) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heat)  
The insignificant natural-gas fired units are each not subject to the requirements of 326 IAC 6-2, since they each are not sources of indirect heat.
- (n) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
The insignificant natural-gas fired units are each not subject to the requirements of 326 IAC 6-3, since they each are not a "manufacturing process" as defined by 326 IAC 6-3-1.5.
- (o) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)  
Pursuant to 326 IAC 7-1.1-1, the insignificant natural-gas fired units are each not subject to the requirements of 326 IAC 7-1, since each has unlimited sulfur dioxide (SO<sub>2</sub>) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour.
- (p) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Each of the insignificant natural-gas fired units is not subject to the requirements of 326 IAC 8-1-6, since each has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

#### Videojet Printer

- (q) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(7), the videojet printer is exempt from the requirements of 326 IAC 6-3, since it uses a flow coating application method.
- (r) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The videojet printer is not subject to the requirements of 326 IAC 8-1-6, since it has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

- (s) 326 IAC 8-2-5 (Paper coating operations)  
The videojet printer is not subject to the requirements of 326 IAC 8-2-9, since the uncontrolled potential VOC emissions from videojet printer are less than fifteen (15) pounds per day.
- (t) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)  
The videojet printer is not subject to the requirements of 326 IAC 8-2-9, since it does not consist of applying surface coatings to metal parts or products and the uncontrolled potential VOC emissions are less than fifteen (15) pounds per day.
- (u) 326 IAC 8-5-5 (Graphic Arts Operations)  
The videojet printer is not subject to the requirements of 326 IAC 8-5-5, since the uncontrolled potential VOC emissions from videojet printer are less than one hundred (100) tons per year and the printers are not packaging rotogravure, publishing rotogravure, or flexographic printing facilities.
- (v) There are no 326 IAC 8 Rules applicable to the videojet printer.

#### **Compliance Determination, Monitoring and Testing Requirements**

There are no compliance determination or monitoring requirements included in this permit.

#### **Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on May 20, 2016.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. M121-37208-00021. The staff recommends to the Commissioner that this New Source Construction and MSOP be approved.

#### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Brian Wright at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.
- (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  
Emissions Summary**

**Company Name: Scott Pet, Inc.  
Source Address: 1543 N US Hwy 41, Rockville, IN 47872  
Permit Number: M121-37208-00021  
Reviewer: Brian Wright**

Process Description	Unlimited Potential to Emit (PTE) (tons/year) Before Control									
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP	
<b>Non-Fugitive Emissions</b>										
Receiving Pit - Straight Truck	19.16	6.28	1.06	0.0	0.0	0.0	0.0	0.0	0.0	---
Enclosed Material Elevator and Conveying System	6.49	3.62	0.62	0.0	0.0	0.0	0.0	0.0	0.0	---
Bulk Storage Bins	2.66	0.67	0.12	0.0	0.0	0.0	0.0	0.0	0.0	---
Dryer	23.42	5.85	1.00	0.0	0.0	0.0	0.0	0.0	0.0	---
Grain Cleaning (Vibrating Screener)	53.22	13.48	2.27	0.0	0.0	0.0	0.0	0.0	0.0	---
Transfer to Intermediate Bins	6.49	3.62	0.62	0.0	0.0	0.0	0.0	0.0	0.0	---
Intermediate Storage Bins	2.66	0.67	0.12	0.00	0.0	0.0	0.0	0.00	0.00	---
Enclosed Aspirator Grain Cleaners	6.49	3.62	0.62	0.0	0.0	0.0	0.0	0.0	0.0	---
Tertiary Bins (used to combine ingredients)	2.66	0.67	0.12	0.0	0.0	0.0	0.0	0.0	0.0	---
Ribbon Mixer	4.01	2.23	0.38	0.0	0.0	0.0	0.0	0.0	0.0	---
Corn Cracker	17.03	8.51	8.51	0.0	0.0	0.0	0.0	0.0	0.00	---
Bagging Operation	6.49	3.62	0.62	0.0	0.0	0.0	0.0	0.0	0.0	---
Fumigation	0.00	0.00	0.00	0.0	0.0	0.0	0.0	0.48	0.48	(phosphine)
Maintenance Welding, Cutting, Grinding	2.83	0.31	0.31	0.0	0.0	0.0	0.0	0.05	0.04	(manganese)
Natural Gas Combustion	0.19	0.77	0.77	0.06	10.18	0.56	8.55	0.19	0.18	(hexane)
Videojet Printer*	0.00	0.00	0.00	0.00	0.00	1.00	0.00	1.00	1.00	(glycol ethers or methanol)
<b>Total PTE (Non-Fugitive)</b>	<b>153.80</b>	<b>53.94</b>	<b>17.14</b>	<b>0.06</b>	<b>10.18</b>	<b>1.56</b>	<b>8.55</b>	<b>1.72</b>	<b>1.00</b>	<b>(glycol ethers or methanol)</b>
<b>Fugitive Emissions</b>										
Paved Roads**	5.35	1.07	0.26	0.0	0.0	0.0	0.0	0.0	0.0	---
<b>Total PTE (Fugitive)</b>	<b>5.35</b>	<b>1.07</b>	<b>0.26</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>---</b>
<b>Total PTE (Non-Fugitive and Fugitive)</b>	<b>159.15</b>	<b>55.01</b>	<b>17.40</b>	<b>0.06</b>	<b>10.18</b>	<b>1.56</b>	<b>8.55</b>	<b>1.72</b>	<b>1.00</b>	<b>(glycol ethers or methanol)</b>

\*As a conservative (worst-case) scenario, the videojet printer is assumed to emit one (1) ton of VOC and one (1) tons of a single HAP (glycol ethers or methanol)

\*\* Unpaved roads and parking lots are only used by employee owned vehicles and are not counted toward PTE.

**Appendix A: Emission Calculations  
Material Handling**

**Company Name:** Scott Pet, Inc.  
**Source Address:** 1543 N US Hwy 41, Rockville, IN 47872  
**Permit Number:** M121-37208-00021  
**Reviewer:** Brian Wright

**Bottleneck Material Throughputs**

Emissions Unit Description	Bottleneck Material Throughputs (tons/hour)*		
	Material Throughput (tons/hour)	Maximum Annual Hours of Operation (hours/year)	Total Bottleneck Material Throughput (tons/yr)
Receiving Pit - Straight Truck	24.3	8,760	212,868
Enclosed Material Elevator and Conveying System	24.3	8,760	212,868
Bulk Storage Bins	24.3	8,760	212,868
Dryer	24.3	8,760	212,868
Grain Cleaning (Vibrating Screener)	24.3	8,760	212,868
Transfer to Intermediate Bins	24.3	8,760	212,868
Intermediate Storage Bins	24.3	8,760	212,868
Enclosed Aspirator Grain Cleaners	24.3	8,760	212,868
Tertiary Bins (used to combine ingredients)	24.3	8,760	212,868
Ribbon Mixer	15.0	8,760	131,400
Corn Cracker	24.3	8,760	212,868
Bagging Operation	24.3	8,760	212,868

**Potential to Emit (PTE) of PM, PM10, and PM2.5**

Emissions Unit Description	Total Bottleneck Material Throughput (tons/yr)*	Uncontrolled Emission Factor (lbs/ton)**			Uncontrolled PTE (tons/year)			Control Device	Collection and Control Efficiency (%)	Controlled PTE (tons/year)		
		PM	PM10	PM2.5	PM	PM10	PM2.5			PM	PM10	PM2.5
Receiving Pit - Straight Truck	212,868	0.18	0.059	0.010	19.16	6.28	1.06	None	0.0%	19.16	6.28	1.1E+00
Enclosed Material Elevator and Conveying	212,868	0.061	0.034	0.0058	6.49	3.62	0.62	Enclosed	0.0%	6.49	3.6E+00	6.2E-01
Bulk Storage Bins	212,868	0.025	0.0063	0.0011	2.66	0.67	0.12	Enclosed	0.0%	2.66	6.7E-01	1.2E-01
Dryer	212,868	0.22	0.055	0.0094	23.42	5.85	1.00	None	0.0%	23.42	5.85	1.00
Grain Cleaning (Vibrating Screener)****	212,868	0.500	0.127	0.0213	53.22	13.48	2.27	Cyclone	85.0%	7.98	2.02	0.34
Transfer to Intermediate Bins***	212,868	0.061	0.034	0.0058	6.49	3.62	0.62	None	0.0%	6.49	3.62	0.62
Intermediate Storage Bins	212,868	0.025	0.0063	0.0011	2.66	0.67	0.12	None	0.0%	2.66	0.67	0.12
Enclosed Aspirator Grain Cleaners***	212,868	0.061	0.034	0.0058	6.49	3.62	0.62	None	0.0%	6.49	3.62	0.62
Tertiary Bins (used to combine ingredients)	212,868	0.025	0.0063	0.0011	2.66	0.67	0.12	None	0.0%	2.66	0.67	0.12
Ribbon Mixer***	131,400	0.061	0.034	0.0058	4.01	2.23	0.38	None	0.0%	4.01	2.23	0.38
Corn Cracker*****	212,868	0.16	0.08	0.08	17.03	8.51	8.51	None	0.0%	17.03	8.51	8.51
Bagging Operation***	212,868	0.061	0.034	0.0058	6.49	3.62	0.62	None	0.0%	6.49	3.62	0.62
					<b>150.78</b>	<b>52.85</b>	<b>16.05</b>			<b>82.13</b>	<b>35.54</b>	<b>13.12</b>

**Methodology**

\* Note: The bottleneck throughputs of bulk and non-bulk materials are based on the maximum throughput of bagging operations. The bagging operations have a combined maximum throughput rate of 48,600 pounds/hour (212,868 tons/year).

\*\* Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03).

\*\*\* Emissions from Conveying System, Transfer, Enclosed Aspirator Grain Cleaners, and Ribbon Mixer and Bagging Operation assumed equal to emissions from Headhouse and Grain Handling from AP 42 Table 9.9.1-1.

\*\*\*\* For the vibrator grain screener, the uncontrolled emission factors were calculated from AP-42 controlled emission factors and assuming a control efficiency of 85% for cyclones.

\*\*\*\*\* For the corn cracker, the uncontrolled emission factor was calculated from AP-42 controlled emission factors and assuming a control efficiency of 85% for cyclones.

Based on footnote (g) in AP 42 Table 9.9.1-2, PM-10 emission factors for grain crackers can be estimated by taking 50 percent of the filterable PM emission factor. PM2.5 assumed equal to PM10

Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr) = [Potential Material Throughput (tons/yr)] \* [Uncontrolled Emission Factor (lbs/ton)] \* [ton/2,000 lbs]

Controlled PTE of PM/PM10/PM2.5 (tons/yr) = [Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr)] \* [1 - Control Efficiency]

**Abbreviations**

PM = Particulate Matter

PM2.5 = Particulate Matter (<2.5 um)

PM10 = Particulate Matter (<10 um)

PTE = Potential to Emit

**Appendix A: Emission Calculations  
326 IAC 6-3-2 Allowable PM Emissions**

**Company Name: Scott Pet, Inc.  
Source Address: 1543 N US Hwy 41, Rockville, IN 47872  
Permit Number: M121-37208-00021  
Reviewer: Brian Wright**

**326 IAC 6-3-2 Allowable PM Emissions**

Process	Maximum Hourly Process Weight Rate (lbs/hr)	Maximum Hourly Process Weight Rate (tons/hr)	Control Device	Control Efficiency (%)	Uncontrolled PM Emission Factor (lbs/ton)	Total Uncontrolled PM Emissions (lbs/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)	Total Controlled PM Emissions (lbs/hr)
Receiving Pit - Straight Truck	220,000	110	None	0.00%	0.18	19.80	52.24	19.80
Enclosed Material Elevator and Conveying System	100,000	50	Enclosed	0.00%	0.061	3.05	44.58	3.05
Bulk Storage Bins (total)	100,000	50	Enclosed	0.00%	0.025	1.25	44.58	1.25
Dryer	112,000	56	None	0.00%	0.220	12.32	45.64	12.32
Grain Cleaning (Vibrating Screener)	56,000	28	Cyclone	85.00%	0.500	14.00	38.23	2.10
Transfer to Intermediate Bins	100,000	50	None	0.00%	0.061	3.05	44.58	3.05
Intermediate Storage Bins (total)	100,000	50	None	0.00%	0.025	1.25	44.58	1.25
Enclosed Aspirator Grain Cleaners (total)	72,000	36	None	0.00%	0.061	2.20	41.57	2.20
Tertiary Bins (used to combine ingredients) (total)	72,000	36	None	0.00%	0.025	0.90	41.57	0.90
Ribbon Mixer	30,000	15	None	0.00%	0.061	0.92	25.16	0.92
Corn Cracker	70,000	35	None	0.00%	0.160	5.60	41.32	5.60
Bagging Operation	48,600	24.3	None	0.00%	0.061	1.48	34.76	1.48

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate up to sixty thousand (60,000) pounds per hour:

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

where

E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

Where the process weight rate is in excess of sixty thousand (60,000) pounds per hour calculate the allowable emissions using of the equation:

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

where

E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (4/03)

**Appendix A: Emission Calculations  
Fumigation**

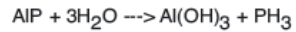
**Company Name:** Scott Pet, Inc.  
**Source Address:** 1543 N US Hwy 41, Rockville, IN 47872  
**Permit Number:** M121-37208-00021  
**Reviewer:** Brian Wright

**PTE of Hazardous Air Pollutants (HAPs)**

Number of Fumigation Events per Month (batches/month)	PHOSTOXIN Dosage (g/batch)	AIP %	AIP Dosage (g/batch)	Molecular Weight of AIP (g/mol)	Molecular Weight of PH <sub>3</sub> (g/mol)	Mol PH <sub>3</sub> / Mol AIP	Phosphine (HAP) Emissions (lbs/batch)	Phosphine (HAP) Emissions (tons/year)
10	11310	55.00%	6221	57.96	34.00	1	8.04	0.48

**Methodology**

The facility uses a product called PHOSTOXIN to fumigate products, as needed. The product contains 55% aluminum phosphide (AIP) as the active ingredient. Aluminum phosphide reacts to form phosphine gas (PH<sub>3</sub>) by the following reaction:



Based on information provided by the facility, a maximum of 10 fumigation events would be conducted during a calendar month.

Potential phosphine (a Hazardous Air Pollutant (HAP)) emissions are calculated as follows:

Phosphine (HAP) Emissions (lbs PH<sub>3</sub>/batch) = PHOSTOXIN Dose (g/batch) \* AIP % \* (Molecular Wt PH<sub>3</sub> g/mol / Molecular Wt AIP g/mol) \* (1 mol PH<sub>3</sub>/mol AIP) \* (1 lb / 453.592 g)  
 HAP Emissions (tons/year) = Phosphine (HAP) Emissions (lbs PH<sub>3</sub>/batch) \* (Number of Fumigation Events per Month (batches/month)) \* (12 months/year) \* (1 ton / 2,000 lbs)



**Appendix A: Emission Calculations  
Welding**

**Company Name: Scott Pet, Inc.  
Source Address: 1543 N US Hwy 41, Rockville, IN 47872  
Permit Number: M121-37208-00021  
Reviewer: Brian Wright**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM <sub>10</sub> =PM <sub>2.5</sub>	Mn	Ni	Cr	PM = PM <sub>10</sub> =PM <sub>2.5</sub>	Mn	Ni	Cr	
WELDING												
GMAW	1	0.250		0.0055	0.0005			0.001	0.000	0	0	1.25E-04
SMAW	1	0.250		0.0211	0.0009			0.005	0.000225	0	0	2.25E-04
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM <sub>10</sub> =PM <sub>2.5</sub>	Mn	Ni	Cr	PM = PM <sub>10</sub> =PM <sub>2.5</sub>	Mn	Ni	Cr	
Acetylene**	1	1	4	0.0039				0.001	0	0	0	0
<b>EMISSION TOTALS</b>												
Potential Emissions lbs/hr								7.59E-03	3.50E-04	0	0	3.50E-04
Potential Emissions lbs/day								0.18	0.01	0	0	8.40E-03
Potential Emissions tons/year								0.033	1.53E-03	0	0	1.53E-03

**Methodology:**

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm t

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

**Appendix A: Emission Calculations  
Grinding**

**Company Name:** Scott Pet, Inc.  
**Source Address:** 1543 N US Hwy 41, Rockville, IN 47872  
**Permit Number:** M121-37208-00021  
**Reviewer:** Brian Wright

**Unlimited Potential to Emit**

**PM/PM10/PM2.5**

Unit ID	Maximum Capacity (lbs/hr)	Uncontrolled Emission Factor* (lbs/ton)	PM10/PM2.5 Uncontrolled Emission Factor* (lbs/ton)	PM Emission Rate before Controls (lbs/hr)	PM10/PM2.5 Emission Rate before Controls (lbs/hr)	PM Emission Rate before Controls (tons/yr)	PM10/PM2.5 Emission Rate before Controls (tons/yr)
Maintenance Grinding	75	17.0	1.7	0.64	0.06	2.79	0.28
<b>Total</b>				<b>3</b>		<b>0</b>	

**Hazardous Air Pollutants (HAPs)**

Unit	Inorganic HAPs (% of PM)*	Lead (% of HAPs)*	Manganese (% of HAPs)*	Uncontrolled Total HAPs (tons/yr)	Uncontrolled Lead (tons/yr)	Uncontrolled Manganese (tons/yr)	
Maintenance Grinding	1.60%	10.00%	90.00%	0.04	0.00	0.04	
<b>Total</b>				<b>0.04</b>		<b>0.00</b>	

\*EPA ICR Sources Iron and steel MACT Table 3, 2/23/2003. Highest value documented was 1.6% Inorganic HAP with "Vast Majority" Manganese. So assumed 90% Manganese and remainder Lead.

**Methodology:**

Process Rate of castings (tons/hr) = maximum cycle time \* maximum capacity each grinder \* number of grinders, and was provided by source.  
 PM emission factor from FIRE Version 6.25 SCC 3-04-003-40 (Shotblast/Grinding), supplied by the source as an alternative emission factor  
 PM10 and PM2.5 assumed to be equal to PM, since no emission factors for PM10 or PM2.5 are available.  
 Uncontrolled PM emissions (lb/hr) = process rate (lbs/hr) x emission factor PM (lb/ton) / (2000 lbs/ton)  
 Uncontrolled PM emissions (ton/yr) = uncontrolled PM emissions (lb/hr) x 8760 hrs/yr / 2000 lb/ton  
 Uncontrolled PM10 emissions (lb/hr) = process rate (lbs/hr) x emission factor PM10 (lb/ton) / (2000 lbs/ton)  
 Uncontrolled PM10 emissions (ton/yr) = uncontrolled PM10 emissions (lb/hr) x 8760 hrs/yr / 2000 lb/ton  
 Uncontrolled PM2.5 emissions (lb/hr) = process rate (lbs/hr) x emission factor PM2.5 (lb/ton) / (2000 lbs/ton)  
 Uncontrolled PM2.5 emissions (ton/yr) = uncontrolled PM2.5 emissions (lb/hr) x 8760 hrs/yr / 2000 lb/ton

**Appendix A: Emission Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name:** Scott Pet, Inc.  
**Source Address:** 1543 N US Hwy 41, Rockville, IN 47872  
**Permit Number:** M121-37208-00021  
**Reviewer:** Brian Wright

Emissions Unit	Heat Input Capacity (MMBtu/hr)
Grain Dryer	21.1
Maintenance Heater	0.0498
Maintenance Heater	0.120
Maintenance Heater	0.100
Maintenance Heater	0.100
Seed Heater	0.320
Seed Heater	0.121
Front Dock Heater	0.290
B2 Heater	0.310
B2 Heater	0.310
B3 Heater	0.320
B4 Heater	0.288
B7 Heater	0.202
Traffic Office Heater	0.08
<b>Total</b>	<b>23.7</b>

HHV	Potential Throughput
mmBtu	MMCF/yr
mmscf	
1020	203.6

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.19	0.77	0.77	0.06	**see below	0.56	8.55

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

**Methodology**

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

**Hazardous Air Pollutants (HAPs)**

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	2.1E-04	1.2E-04	7.6E-03	0.18	3.5E-04	<b>0.19</b>

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	5.1E-05	1.1E-04	1.4E-04	3.9E-05	2.1E-04	<b>5.6E-04</b>
					<b>Total HAPs</b>	<b>0.19</b>
					<b>Worst HAP</b>	<b>0.18</b>

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

**Appendix A: Emission Calculations  
Paved Roads**

**Company Name:** Scott Pet, Inc.  
**Source Address:** 1543 N US Hwy 41, Rockville, IN 47872  
**Permit Number:** M121-37208-00021  
**Reviewer:** Brian Wright

Potential Material Throughput\* =  (tons/year)

**Paved Roads at Industrial Site**

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

Process	Vehicle Type	Maximum Weight of Vehicle (tons)	Maximum Weight of Load (tons)	Maximum Weight of Vehicle and Load (tons/trip)	Maximum trips per year (trip/yr)	Total Weight driven per year (ton/yr)	Maximum one-way distance (feet/trip)*	Maximum one-way distance (miles/trip)	Maximum one-way miles (miles/yr)
Material delivery truck entering site full	Grain Tanker (5 axle bulk dry tanker)	19.0	26.0	40.0	8.2E+03	3.3E+05	800	0.15	1240.5
Material delivery truck leaving site empty	Grain Tanker (5 axle bulk dry tanker)	19.0	0.0	19.0	8.2E+03	1.6E+05	800	0.15	1240.5
Delivery truck entering site empty	Freight Truck (5 axles)	15.0	0.0	15.0	8.5E+03	1.3E+05	1000	0.19	1612.6
Delivery truck leaving site full	Freight Truck (5 axles)	15.0	25.0	40.0	8.5E+03	3.4E+05	200	0.04	322.5
<b>Total</b>					<b>33,404</b>	<b>951,356</b>			<b>4,416</b>

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

Unmitigated Emission Factor, Ef = [k \* (sL)<sup>0.91</sup> \* (W)<sup>1.02</sup>] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	28.5	28.5	28.5	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m <sup>2</sup> = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E \* [1 - (p/4N)]

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

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	2.65	0.53	0.13	lb/mile
Mitigated Emission Factor, Eext =	2.42	0.48	0.12	lb/mile

Process	Vehicle Type	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)
Grain truck entering site full	Grain Tanker (5 axle bulk dry tanker)	1.64	0.33	0.08	1.50	0.30	0.07
Grain truck leaving site empty	Grain Tanker (5 axle bulk dry tanker)	1.64	0.33	0.08	1.50	0.30	0.07
Delivery truck entering site empty	Freight Truck (5 axles)	2.14	0.43	0.10	1.95	0.39	0.10
Delivery truck leaving site full	Freight Truck (5 axles)	0.43	0.09	0.02	0.39	0.08	0.02
<b>Total</b>		<b>5.85</b>	<b>1.17</b>	<b>0.29</b>	<b>5.35</b>	<b>1.07</b>	<b>0.26</b>

**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)

**Abbreviations**

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



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

September 22, 2016

Mr. Nathan Peters  
Scott Pet, Inc.  
PO Box 168  
Rockville, IN 47872

Re: Public Notice  
Scott Pet, Inc.  
Permit Level: New Construction MSOP  
Permit Number: 121 - 37208 - 00021

Dear Mr. Peters:

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

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Parke County Sentinel in Rockville, Indiana publish the abbreviated version of the public notice no later than September 28, 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 Rockville Public Library, 106 N Market in Rockville IN. 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 Brian Wright, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-6544 or dial (317) 234-6544.

Sincerely,

*Len Pogost*

Len Pogost  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter 2/17/2016



# Indiana Department of Environmental Management

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## **ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING**

September 22, 2016

Parke County Sentinel  
Attn: Classifieds  
P.O. Box 187  
Rockville, Indiana 47872

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Scott Pet, Inc., Parke 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 September 28, 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 Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

*Len Pogost*

Len Pogost  
Permit Branch  
Office of Air Quality

Permit Level: New Construction MSOP  
Permit Number: 121 - 37208 - 00021

Enclosure  
PN Newspaper.dot 6/13/2013



# Indiana Department of Environmental Management

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**Michael R. Pence**  
*Governor*

**Carol S. Comer**  
*Commissioner*

September 22, 2016

To: Rockville Public Library 106 N Market Rockville IN

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: Scott Pet, Inc.**  
**Permit Number: 121 - 37208 - 00021**

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

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

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

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

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

Enclosures  
PN Library.dot 2/16/2016



# Indiana Department of Environmental Management

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## Notice of Public Comment

**September 22, 2016**

**Scott Pet, Inc.**

**121 - 37208 - 00021**

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](mailto: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	LPOGOST 9/22/2016 Scott Pet Incorporated 121 - 37208 - 00021 draft/		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	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		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling 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		Nathan Peters Scott Pet Incorporated PO Box 168 Rockville IN 47872 (Source CAATS)									
2		Michael Bassett CEO Scott Pet Incorporated PO Box 168 Rockville IN 47872 (RO CAATS)									
3		Parke County Commissioners 116 West High Street Rockville IN 47872 (Local Official)									
4		Rockville Public Library 106 N Market Rockville IN 47872-1718 (Library)									
5		Mr. Gary Hanner Hanner Hanner & Hanner P.O. Box 122 Rockville IN 47872 (Affected Party)									
6		Parke County Health Department 116 W. High St. Room 10 Rockville IN 47872 (Health Department)									
7		Rockville Town Council and Town Manager P.O. Box 143 Rockville IN 47872 (Local Official)									
8		Mr. Alic Bent August Mack Environmental, Inc. 1302 N Meridian St, Suite 300 Indianapolis IN 46202 (Consultant)									
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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