



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

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Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

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

for PacMoore Process Technologies in Morgan County

Significant Permit Revision No.: 109-37617-00062

The Indiana Department of Environmental Management (IDEM) has received an application from PacMoore Process Technologies, located at 100 Pac Moore Parkway, Mooresville, Indiana 46158, for a significant revision of its FESOP issued on September 26, 2016. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow PacMoore Process Technologies to make certain changes at its existing source. PacMoore Process Technologies has applied to construct a Bulk Loadout operation.

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

IDEM is aware that the Bulk Loadout 2 operation has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft Significant Permit Revision 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:

Mooresville Public Library  
220 West Harrison Street  
Mooresville, Indiana 46158

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 SPR 109-37617-00062 in all correspondence.

**Comments should be sent to:**

Allen Reimer  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 3-0863  
Or dial directly: (317) 233-0863  
Fax: (317) 232-6749 attn: Allen Reimer  
E-mail: [acreimer@idem.IN.gov](mailto:acreimer@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 Allen Reimer or my staff at the above address.



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



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**Michael R. Pence**  
Governor

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**Carol S. Comer**  
Commissioner

Mr. Chris Hallman  
PacMoore Process Technologies  
100 PacMoore Parkway  
Mooresville, Indiana 46158

Re: 109-37617-00062  
Significant Revision to  
F109-36436-00062

Dear Mr. Hallman:

PacMoore Process Technologies was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F109-36436-00062 on September 26, 2016, for a stationary dry food grade materials manufacturing facility located at 100 PacMoore Parkway, Mooresville, Indiana 46158. On September 14, 2016, the Office of Air Quality (OAQ) received an application from the source requesting the addition of one (1) Bulk Loadout Operation, identified as Bulk Loadout 2 (BLO2). Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, the following emission unit is approved for construction at the source:

- (a) One (1) Bulk Loadout, identified as Bulk Loadout 2 (BLO2), constructed in 2016 and permitted in 2016, consisting of a sifter and packaging station docking station, with a maximum throughput capacity of 10,000 lbs dry food-grade materials/hour, equipped with a baghouse, identified as BH18, to control particulate emissions from the sifter and from a docked moveable packaging station, exhausting outdoors through stack S3.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

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

Effective Date of the Permit

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

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Commenced Construction

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the Significant Permit Revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/ideM-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/ideM/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/ideM/6900.htm>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions on this matter, please contact Allen Reimer, of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 at 317-233-0863 or 1-800-451-6027, and ask for extension 3-0863.

Sincerely,

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

Attachments: Revised permit and Technical Support Document.

cc: File - Morgan County  
Morgan County Health Department  
U.S. EPA, Region 5  
Compliance and Enforcement Branch



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## **New Source Review and Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY**

**PacMoore Process Technologies  
100 PacMoore Parkway  
Mooresville, Indiana 46158**

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

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

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

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

Operation Permit No. F109-36436-00062	
Issued by: Original Signed by Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 26, 2016  Expiration Date: September 26, 2026

Significant Permit Revision No. 109-37617-00062	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date: September 26, 2026

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### **TABLE OF CONTENTS**

<b>SECTION A</b>	<b>SOURCE SUMMARY .....</b>	<b>4</b>
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]	
A.4	Other Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]	
A.5	FESOP Applicability [326 IAC 2-8-2]	
<b>SECTION B</b>	<b>GENERAL CONDITIONS .....</b>	<b>10</b>
B.1	Definitions [326 IAC 2-8-1]	
B.2	Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6] [IC 13-17-12]	
B.5	Severability [326 IAC 2-8-4(4)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.9	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11	Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)]	
B.12	Emergency Provisions [326 IAC 2-8-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14	Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]	
B.15	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]	
B.16	Permit Renewal [326 IAC 2-8-3(h)]	
B.17	Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]	
B.18	Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]	
B.19	Source Modification Requirement [326 IAC 2-8-11.1]	
B.20	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]	
B.21	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.22	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.23	Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]	
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS.....</b>	<b>19</b>
	<b>Emission Limitations and Standards [326 IAC 2-8-4(1)] .....</b>	<b>19</b>
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	<b>Testing Requirements [326 IAC 2-8-4(3)].....</b>	<b>21</b>
C.9	Performance Testing [326 IAC 3-6]	
	<b>Compliance Requirements [326 IAC 2-1.1-11] .....</b>	<b>21</b>
C.10	Compliance Requirements [326 IAC 2-1.1-11]	
	<b>Compliance Monitoring Requirements [326 IAC 2-8-4(1)] [326 IAC 2-8-5(a)(1)] .....</b>	<b>22</b>
C.11	Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]	
C.12	Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]	

## DRAFT

<b>Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)] .....</b>	<b>22</b>
C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]	
C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]	
C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]	
<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] .....</b>	<b>23</b>
C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]	
C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]	
<b>Stratospheric Ozone Protection .....</b>	<b>25</b>
C.18 Compliance with 40 CFR 82 and 326 IAC 22-1	
<b>SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS .....</b>	<b>26</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)] .....</b>	<b>29</b>
D.1.1 Particulate Matter [326 IAC 2-8] [326 IAC 2-2] [326 IAC 2-1.1-5]	
D.1.2 Particulate Emission Limitations [326 IAC 6-3-2]	
D.1.3 Particulate Emissions [326 IAC 6-2-4]	
D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]	
<b>Compliance Determination Requirements [326 IAC 2-8-4(1)] .....</b>	<b>33</b>
D.1.5 Particulate Control	
D.1.6 Testing	
<b>Compliance Monitoring Requirements [326 IAC 2-8-4(1)] [326 IAC 2-8-5(a)(1)] .....</b>	<b>35</b>
D.1.7 Visible Emissions Notations	
D.1.8 Baghouse Inspections	
D.1.9 Broken or Failed Bag Detection	
D.1.10 Parametric Monitoring	
<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] .....</b>	<b>37</b>
D.1.11 Record Keeping Requirements	
<b>CERTIFICATION .....</b>	<b>38</b>
<b>EMERGENCY OCCURRENCE REPORT .....</b>	<b>39</b>
<b>QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT .....</b>	<b>41</b>

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**SECTION A** **SOURCE SUMMARY**

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

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

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The Permittee owns and operates a stationary dry food-grade materials manufacturing source.

Source Address:	100 PacMoore Parkway, Mooresville, Indiana 46158
General Source Phone Number:	(317) 210-3159
SIC Code:	2099
County Location:	Morgan County, Clay Township
Source Location Status:	Nonattainment for SO <sub>2</sub> standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) blend room, identified as Blend Room 1, constructed in 2006 and permitted in 2011, consisting of one (1) sifter, one (1) mixer, and one (1) packaging station docking station, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, equipped with a baghouse, identified as BH1, to control particulate emissions from the sifter, and a baghouse, identified as BH2, to control particulate emissions from a docked moveable packaging station, both baghouses exhaust inside the building.
- (b) One (1) blend room, identified as Blend Room 2, constructed in 2006 and permitted in 2011, consisting of one (1) sifter, one (1) mixer, and one (1) packaging station docking station, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, equipped with a baghouse, identified as BH3, to control particulate emissions from the sifter, and a baghouse, identified as BH4, to control particulate emissions from a docked moveable packaging station, both baghouses exhaust inside the building.
- (c) One (1) blend room, identified as Liquid & Powder Blending Operation, approved for construction in 2016, consisting of one (1) breddo mixer (BM2), one (1) bulk liquid storage tank with no regulated emissions, and one (1) tanker bulk liquid loadout station with no regulated emissions, with a maximum throughput capacity of 2,406 pounds per hour dry material, 719 pounds of water per hour, for a total maximum throughput capacity of 3,125 pounds per hour, using a baghouse identified as BH17 as control for the mixer, exhausting to stack S2.
- (d) One (1) blend room, identified as Blend Room 4, approved for construction in 2016, consisting of two (2) sifters, each with a maximum throughput capacity of 3,125 pounds of dry material, one (1) blender (Blender 4 (BR4)), with a maximum throughput capacity of 6,250 pounds of dry material, two (2) surge hoppers (Surge Hopper 2 and Surge Hopper 3), each with a maximum throughput capacity of 3,125 pounds of dry material per hour, and two (2) docking stations for a movable packaging station, each with a maximum throughput capacity of 3,125 pounds per hour dry material, emissions controlled by wet scrubber WS1, exhausting to stack S7.



## DRAFT

- (e) One (1) Re-Pack Room, identified as Re-Pack Room 2, constructed in 2006 and permitted in 2011, consisting of a sifter and packaging station docking station, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, equipped with a baghouse, identified as BH7, to control particulate emissions from the sifter, and a baghouse, identified as BH8, to control particulate emissions from a docked moveable packaging station, both baghouses exhaust inside the building.
- (f) One (1) Re-Pack Room, identified as Re-Pack Room 3, constructed in 2010 and permitted in 2011, consisting of a sifter and packaging station docking station, with a maximum throughput capacity of 12,500 lbs of dry food-grade materials/hour, equipped with a baghouse, identified as BH5, to control particulate emissions from the sifter, and a baghouse, identified as BH6, to control particulate emissions from a docked moveable packaging station docking station, both baghouses exhaust inside the building.
- (g) One (1) Re-Pack Room, identified as Re-Pack Room 4 (RP4), approved for construction in 2016, consisting of Hopper 1, Sifter 1, Conveyor 2, and a packaging station docking station, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, equipped with a baghouse, identified as BH15, to control particulate emissions from the small receiving bin, exhausting to stack S5, and a baghouse, identified as BH19, to control emissions from Hopper 1, Sifter 1, and Conveyor 2 used to fill a docked moveable packaging station, exhausting inside the building.
- (h) One (1) Bulk Loadout, identified as Bulk Loadout, constructed in 2006 and permitted in 2011, consisting of a sifter and packaging station docking station, with a maximum throughput capacity of 10,000 lbs dry food-grade materials/hour, equipped with a baghouse, identified as BH9, to control particulate emissions from the sifter, and a baghouse, identified as BH10, to control particulate emissions from a docked moveable packaging station, both baghouses exhaust inside the building.
- (i) One (1) Rail/Truck Unloading Operation, identified as Rail/Truck Unloading, constructed in 2006 and permitted in 2011, with a maximum throughput capacity of 10,000 lbs dry food-grade materials/hour, with materials conveyed to a silo equipped with a bin vent, identified as BV1, venting indoors, and materials transferred to a packaging station docking station, equipped with a baghouse, identified as BH11, to control particulate emissions from a docked moveable packaging station, exhausting inside the building.
- (j) One (1) Baler, identified as Baler, constructed in 2006 and permitted in 2011, with a maximum capacity of 12,500 lbs of used product bags/hour, equipped with a baghouse, identified as BH12, to control particulate emissions, exhausting inside the building.
- (k) One (1) Pilot Spray Dryer, identified as Pilot Spray Dryer, constructed in 2007 and permitted in 2011, with a maximum throughput capacity of 60 lbs dry food-grade materials/hour, consisting of an electric heater, an integral product recovery cyclone, identified as C0, and a baghouse, identified as BH14, to control particulate emissions, exhausting outside the building at stack S6.
- (l) One (1) Spray Dryer Line, identified as Spray Dryer Line 1, with a maximum throughput capacity of 5,000 lbs dry food-grade materials/hour, and including:
  - (1) Two (2) bag dump stations, identified as Bag Dump 1 and Bag Dump 2, constructed in 2012 and permitted in 2014, having a combined maximum throughput capacity of 2,000 lbs dry food-grade materials/hour, and a total combined throughput capacity of 5,000 lbs of wet and dry materials/hr, controlling particulate emissions with one (1) baghouse, identified as BH17, exhausting outside the building at stack S2;

## DRAFT

- (2) Two (2) mix tanks, identified as Mix Tank 1 and Mix Tank 2, constructed in 2012 and permitted in 2014, having a total combined maximum throughput capacity of 2,000 lbs dry food-grade materials/hour, and a total combined throughput capacity of 5,000 lbs of wet and dry materials/hr, controlling particulate emissions with one (1) baghouse, identified as BH17, exhausting outside the building at stack S2;
  - (3) One (1) spray dryer, identified as Spray Dryer 1, constructed in 2011, having a maximum throughput capacity of 2,000 lbs dry food-grade materials/hour, and a total combined throughput capacity of 5,000 lbs of wet and dry materials/hr, equipped with a total of 6.4 MMBtu/hr natural gas-fired low-NOx burners, and one (1) large integral product recovery cyclone, identified as C1, controlling particulate emissions with one (1) baghouse, identified as BH13, exhausting outside the building at stack S1;
  - (4) One (1) packaging station docking station, constructed in 2011, with a maximum throughput capacity of 1,863 pounds dry per hour, particulate emissions are controlled with one (1) baghouse, identified as BH17, exhausting outside the building at stack S2;
  - (5) One (1) mixer, constructed 2014, identified as Breddo Mixer 1 (BM1), with a maximum throughput capacity of 2,000 lbs dry food-grade materials/hour, 3,000 pounds of water per hour, for a combined maximum throughput capacity of 5,000 lbs of wet and dry materials/hr, using a baghouse identified as BH17 as control, exhausting to stack S2; and
  - (6) One (1) conveyor, constructed in 2015, identified as Powdered Product Conveyor 1 (CV1), with a maximum throughput capacity of 1,790 lbs dry food-grade materials/hour, 75 pounds of water per hour, for a combined maximum throughput capacity of 1,865 lbs of wet and dry materials/hr, using a baghouse identified as BH17 as control, exhausting to stack S2.
- (m) One (1) Milling Line, identified as Grinding Mill 1, including the following:
- (1) One (1) receiving bin, identified as Small Receiving Bin, constructed in 2013, with a maximum throughput capacity of 200 lbs dry food grade materials per hour, equipped with a baghouse, identified as BH15, to control particulate emissions, exhausting outside the building at stack S5;
  - (2) One (1) grinding mill, identified as Grinding Mill 1, constructed in 2013, with a maximum throughput capacity of 1,500 lbs dry food grade materials per hour, with particulate emissions routed to the receiving bin;
  - (3) One (1) receiving bin, identified as Large Receiving Bin, constructed in 2013, with a maximum throughput capacity of 1,500 lbs dry food grade materials per hour, equipped with a baghouse, identified as BH16, to control particulate emissions, exhausting outside the building at stack S4; and
  - (4) One (1) packaging station docking station, constructed in 2013, with a maximum throughput capacity of 1,500 pounds per hour, particulate emissions are controlled with one (1) baghouse, identified as BH19, exhausting inside the building.

## DRAFT

- (n) One (1) extruder line, identified as Extrusion Line 1, consisting of the following emission units:
- (1) One (1) sifter, approved in 2016 for construction, identified as Extrusion Line 1 Sifter 1, with a maximum throughput capacity of 3,000 pounds of per hour, emissions controlled by wet scrubber WS1, exhausting to stack S7;
  - (2) One (1) mixer, approved in 2016 for construction, identified as Mixer 3, with a maximum throughput capacity of 3,000 pounds per hour, emissions controlled by wet scrubber WS1, exhausting to stack S7;
  - (3) One (1) surge hopper, approved in 2016 for construction, identified as 1A, with a maximum throughput capacity of 3,000 pounds per hour, emissions controlled by wet scrubber WS1, exhausting to stack S7;
  - (4) One (1) loss-in-weight feeder, approved in 2016 for construction, identified as F1, with a maximum throughput capacity of 3,000 pounds per hour, emissions controlled by wet scrubber WS1, exhausting to stack S7;
  - (5) One (1) extruder with a raw material preconditioner and a product collector cyclone (C3), or plastic belt conveyor (BC1), which feeds product to an inclined plastic belt conveyor (BC2) to feed product to belt dryer (BD1), plastic belt conveyors have potential PM emissions of less than 0.551 pounds per hour, approved in 2016 for construction, identified as Extruder 1 (EX1) with a maximum throughput capacity of 3,000 pounds per hour, emissions controlled by wet scrubber WS2, exhausting to stack S8;
  - (6) One (1) natural gas-fired belt dryer, approved in 2016 for construction, identified as BD1, with a maximum heat input capacity of 3.0 MMBtu/hr, with a maximum throughput capacity of 3,000 pounds per hour, emissions controlled by wet scrubber WS2, exhausting to stack S8;
  - (7) One (1) open vibratory conveyor and one (1) enclosed bucket conveyor, approved in 2016 for construction, each with a maximum throughput capacity of 3,000 dry pounds per hour, emissions vent to Extrusion Line 1 Sifter 2;
  - (8) One (1) sifter, approved in 2016 for construction, identified as Extrusion Line 1 Sifter 2, each with a maximum throughput capacity of 3,000 pounds per hour of dry material, emissions controlled by wet scrubber WS1, exhausting to stack S7;
  - (9) One (1) surge hopper, approved in 2016 for construction, identified as 1B, with a maximum throughput capacity of 3,000 pounds per hour, emissions controlled by wet scrubber WS1, exhausting to stack S7; and
  - (10) One (1) docking station for a moveable packaging station, approved in 2016 for construction, identified as 070, with a maximum throughput capacity of 3,000 pounds per hour, emissions controlled by wet scrubber WS1, exhausting to stack S7.
- (o) One (1) Bulk Loadout, identified as Bulk Loadout 2 (BLO2), constructed in 2016 and permitted in 2016, consisting of a sifter and packaging station docking station, with a maximum throughput capacity of 10,000 lbs dry food-grade materials/hour, equipped with a baghouse, identified as BH18, to control particulate emissions from the sifter and from a docked moveable packaging station, exhausting outdoors through stack S3.

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

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

- (a) Paved roads with no controls. [326 IAC 6-4]
- (b) One (1) natural gas-fired water heater used for process purposes, constructed in 2006, permitted in 2011, with a maximum heat input capacity of 0.66 MMBtu/hr, uncontrolled, exhausting outside the building. [326 IAC 6-2]

### A.4 Other Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes the following insignificant activities which are not specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Fourteen (14) moveable final product packaging stations, as follows:
  - (1) one (1) moveable packaging station, identified as 032, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;
  - (2) one (1) moveable packaging station, identified as 035, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;
  - (3) one (1) moveable packaging station, identified as 051, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;
  - (4) one (1) moveable packaging station, identified as 054, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;
  - (5) one (1) moveable packaging station, identified as 062, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;
  - (6) one (1) moveable packaging station, identified as 063, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;
  - (7) one (1) moveable packaging station, identified as 064, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;

## DRAFT

- (8) one (1) moveable packaging station, identified as 066, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;
- (9) one (1) moveable packaging station, identified as 067, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;
- (10) one (1) moveable packaging station, identified as 068, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;
- (11) one (1) moveable packaging station, identified as 069, constructed in 2006, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;
- (12) one (1) moveable packaging station, identified as 00166, constructed in 2013, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, controlling particulate emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis;
- (13) one (1) moveable packaging station, identified as 00170, constructed in 2006, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, controlling particulate emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis; and
- (14) one (1) moveable packaging station, identified as 00172, constructed in 2011, with a maximum throughput capacity of 2,000 lbs dry food-grade materials/hour, controlling particulate emissions with the current docking station baghouse and exhausting as appropriate to that baghouse. This unit is connected to any given line docking station on an "as needed" basis.

Note: Each of the above-listed moveable packaging stations may be moved throughout the plant and are connected to a given line, as needed, as appropriate to the packaging requirements for the order being filled.

### A.5 FESOP Applicability [326 IAC 2-8-2]

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

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**SECTION B**

**GENERAL CONDITIONS**

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

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

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

- (a) This permit, F109-36436-00062, is issued for a fixed term of ten (10) 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.3 Term of Conditions [326 IAC 2-1.1-9.5]**

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

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

**B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]**

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

**B.5 Severability [326 IAC 2-8-4(4)]**

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

**B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

**B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
  - (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and

## DRAFT

- (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

### B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

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

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

### B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

### B.11 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)]

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

## DRAFT

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

The Permittee shall implement the PMPs.

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.



## DRAFT

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

## DRAFT

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

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

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

- (a) All terms and conditions of permits established prior to F109-36436-00062 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.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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

## DRAFT

### B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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

### B.16 Permit Renewal [326 IAC 2-8-3(h)]

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

## DRAFT

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

### B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

### B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

## DRAFT

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

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

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

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

### B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

### B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]

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

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

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### B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

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

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

### B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

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

### B.23 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [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.

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**SECTION C**

**SOURCE OPERATION CONDITIONS**

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

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

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

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

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

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

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

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

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

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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]

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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 Stack Height [326 IAC 1-7]

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

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

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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



## DRAFT

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

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

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

#### C.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. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

#### C.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.

## DRAFT

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

#### C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

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

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

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

#### C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

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

#### C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

#### C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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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.

## DRAFT

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

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

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

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

#### C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
  - (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.

## DRAFT

(CC) Copies of all reports required by the FESOP.

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

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

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

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

### C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) 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.

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**Stratospheric Ozone Protection**

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

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

## DRAFT

### SECTION D.1

### EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description:

- (a) One (1) blend room, identified as Blend Room 1, constructed in 2006 and permitted in 2011, consisting of one (1) sifter, one (1) mixer, and one (1) packaging station docking station, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, equipped with a baghouse, identified as BH1, to control particulate emissions from the sifter, and a baghouse, identified as BH2, to control particulate emissions from a docked moveable packaging station, both baghouses exhaust inside the building.
- (b) One (1) blend room, identified as Blend Room 2, constructed in 2006 and permitted in 2011, consisting of one (1) sifter, one (1) mixer, and one (1) packaging station docking station, with a maximum throughput capacity of 6,250 lbs dry food-grade materials/hour, equipped with a baghouse, identified as BH3, to control particulate emissions from the sifter, and a baghouse, identified as BH4, to control particulate emissions from a docked moveable packaging station, both baghouses exhaust inside the building.
- (c) One (1) blend room, identified as Liquid & Powder Blending Operation, approved for construction in 2016, consisting of one (1) breddo mixer (BM2), one (1) bulk liquid storage tank with no regulated emissions, and one (1) tanker bulk liquid loadout station with no regulated emissions, with a maximum throughput capacity of 2,406 pounds per hour dry material, 719 pounds of water per hour, for a total maximum throughput capacity of 3,125 pounds per hour, using a baghouse identified as BH17 as control for the mixer, exhausting to stack S2.
- (d) One (1) blend room, identified as Blend Room 4, approved for construction in 2016, consisting of two (2) sifters, each with a maximum throughput capacity of 3,125 pounds of dry material, one (1) blender (Blender 4 (BR4)), with a maximum throughput capacity of 6,250 pounds of dry material, two (2) surge hoppers (Surge Hopper 2 and Surge Hopper 3), each with a maximum throughput capacity of 3,125 pounds of dry material per hour, and two (2) docking stations for a movable packaging station, each with a maximum throughput capacity of 3,125 pounds per hour dry material, emissions controlled by wet scrubber WS1, exhausting to stack S7.
- (e) One (1) Re-Pack Room, identified as Re-Pack Room 2, constructed in 2006 and permitted in 2011, consisting of a sifter and packaging station docking station, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, equipped with a baghouse, identified as BH7, to control particulate emissions from the sifter, and a baghouse, identified as BH8, to control particulate emissions from a docked moveable packaging station, both baghouses exhaust inside the building;
- (f) One (1) Re-Pack Room, identified as Re-Pack Room 3, constructed in 2010 and permitted in 2011, consisting of a sifter and packaging station docking station, with a maximum throughput capacity of 12,500 lbs of dry food-grade materials/hour, equipped with a baghouse, identified as BH5, to control particulate emissions from the sifter, and a baghouse, identified as BH6, to control particulate emissions from a docked moveable packaging station docking station, both baghouses exhaust inside the building;
- (g) One (1) Re-Pack Room, identified as Re-Pack Room 4 (RP4), approved for construction in 2016, consisting of Hopper 1, Sifter 1, Conveyor 2, and a packaging station docking station, with a maximum throughput capacity of 12,500 lbs dry food-grade materials/hour, equipped with a baghouse, identified as BH15, to control particulate emissions from the small receiving bin, exhausting to stack S5, and a baghouse, identified as BH19, to control emissions from Hopper 1, Sifter 1, and Conveyor 2 used to fill a docked moveable packaging station, exhausting inside the building.

## DRAFT

- (h) One (1) Bulk Loadout, identified as Bulk Loadout, constructed in 2006 and permitted in 2011, consisting of a sifter and packaging station docking station, with a maximum throughput capacity of 10,000 lbs dry food-grade materials/hour, equipped with a baghouse, identified as BH9, to control particulate emissions from the sifter, and a baghouse, identified as BH10, to control particulate emissions from a docked moveable packaging station, both baghouses exhaust inside the building;
- (i) One (1) Rail/Truck Unloading Operation, identified as Rail/Truck Unloading, constructed in 2006 and permitted in 2011, with a maximum throughput capacity of 10,000 lbs dry food-grade materials/hour, with materials conveyed to a silo equipped with a bin vent, identified as BV1, venting indoors, and materials transferred to a packaging station docking station, equipped with a baghouse, identified as BH11, to control particulate emissions from a docked moveable packaging station, exhausting inside the building;
- (j) One (1) Baler, identified as Baler, constructed in 2006 and permitted in 2011, with a maximum capacity of 12,500 lbs of used product bags/hour, equipped with a baghouse, identified as BH12, to control particulate emissions, exhausting inside the building;
- (k) One (1) Pilot Spray Dryer, identified as Pilot Spray Dryer, constructed in 2007 and permitted in 2011, with a maximum throughput capacity of 60 lbs dry food-grade materials/hour, consisting of an electric heater, an integral product recovery cyclone, identified as C0, and a baghouse, identified as BH14, to control particulate emissions, exhausting outside the building at stack S6;
- (l) One (1) Spray Dryer Line, identified as Spray Dryer Line 1, with a maximum/bottlenecked throughput capacity of 5,000 lbs dry food-grade materials/hour, and including:
  - (1) Two (2) bag dump stations, identified as Bag Dump 1 and Bag Dump 2, constructed in 2012 and permitted in 2014, having a combined maximum throughput capacity of 2,000 lbs dry food-grade materials/hour, and a total combined throughput capacity of 5,000 lbs of wet and dry materials/hr, controlling particulate emissions with one (1) baghouse, identified as BH17, exhausting outside the building at stack S2;
  - (2) Two (2) mix tanks, identified as Mix Tank 1 and Mix Tank 2, constructed in 2012 and permitted in 2014, having a total combined maximum throughput capacity of 2,000 lbs dry food-grade materials/hour, and a total combined throughput capacity of 5,000 lbs of wet and dry materials/hr, controlling particulate emissions with one (1) baghouse, identified as BH17, exhausting outside the building at stack S2;
  - (3) One (1) spray dryer, identified as Spray Dryer 1, constructed in 2011, having a maximum throughput capacity of 2,000 lbs dry food-grade materials/hour, and a total combined throughput capacity of 5,000 lbs of wet and dry materials/hr, equipped with a total of 6.4 MMBtu/hr natural gas-fired low-NOx burners, and one (1) large integral product recovery cyclone, identified as C1, controlling particulate emissions with one (1) baghouse, identified as BH13, exhausting outside the building at stack S1;
  - (4) One (1) packaging station docking station, constructed in 2011, with a maximum throughput capacity of 1,863 pounds dry per hour, particulate emissions are controlled with one (1) baghouse, identified as BH17, exhausting outside the building at stack S2;
  - (5) One (1) mixer, constructed 2014, identified as Breddo Mixer 1 (BM1), with a maximum throughput capacity of 2,000 lbs dry food-grade materials/hour, 3,000 pounds of water per hour, for a combined maximum throughput capacity of 5,000 lbs of wet and dry materials/hr, using a baghouse identified as BH17 as control, exhausting to stack S2; and

## DRAFT

- (6) One (1) conveyor, constructed in 2015, identified as Powdered Product Conveyor 1 (CV1), with a maximum throughput capacity of 1,790 lbs dry food-grade materials/hour, 75 pounds of water per hour, for a combined maximum throughput capacity of 1,865 lbs of wet and dry materials/hr, using a baghouse identified as BH17 as control, exhausting to stack S2.
- (m) One (1) Milling Line, identified as Grinding Mill 1, including the following:
  - (1) One (1) receiving bin, identified as Small Receiving Bin, constructed in 2013, with a maximum throughput capacity of 200 lbs dry food grade materials per hour, equipped with a baghouse, identified as BH15, to control particulate emissions, exhausting outside the building at stack S5;
  - (2) One (1) grinding mill, identified as Grinding Mill 1, constructed in 2013, with a maximum throughput capacity of 1,500 lbs dry food grade materials per hour, with particulate emissions routed to the receiving bin;
  - (3) One (1) receiving bin, identified as Large Receiving Bin, constructed in 2013, with a maximum throughput capacity of 1,500 lbs dry food grade materials per hour, equipped with a baghouse, identified as BH16, to control particulate emissions, exhausting outside the building at stack S4; and
  - (4) One (1) packaging station docking station, constructed in 2013, with a maximum throughput capacity of 1,500 pounds per hour, particulate emissions are controlled with one (1) baghouse, identified as BH19, exhausting inside the building.
- (n) One (1) extruder line, identified as Extrusion Line 1, consisting of the following emission units:
  - (1) One (1) sifter, approved in 2016 for construction, identified as Extrusion Line 1 Sifter 1, with a maximum throughput capacity of 3,000 pounds of per hour, emissions controlled by wet scrubber WS1, exhausting to stack S7;
  - (2) One (1) mixer, approved in 2016 for construction, identified as Mixer 3, with a maximum throughput capacity of 3,000 pounds per hour, emissions controlled by wet scrubber WS1, exhausting to stack S7;
  - (3) One (1) surge hopper, approved in 2016 for construction, identified as 1A, with a maximum throughput capacity of 3,000 pounds per hour, emissions controlled by wet scrubber WS1, exhausting to stack S7;
  - (4) One (1) loss-in-weight feeder, approved in 2016 for construction, identified as F1, with a maximum throughput capacity of 3,000 pounds per hour, emissions controlled by wet scrubber WS1, exhausting to stack S7;
  - (5) One (1) extruder with a raw material preconditioner and a product collector cyclone (C3), or plastic belt conveyor (BC1), which feeds product to an inclined plastic belt conveyor (BC2) to feed product to belt dryer (BD1), plastic belt conveyors have potential PM emissions of less than 0.551 pounds per hour approved in 2016 for construction, identified as Extruder 1 (EX1) with a maximum throughput capacity of 3,000 pounds per hour, emissions controlled by wet scrubber WS2, exhausting to stack S8;
  - (6) One (1) natural gas-fired belt dryer, approved in 2016 for construction, identified as BD1, with a maximum heat input capacity of 3.0 MMBtu/hr, with a maximum throughput capacity of 3,000 pounds per hour, emissions controlled by wet scrubber WS2, exhausting to stack S8;



## DRAFT

- (7) One (1) open vibratory conveyor and one (1) enclosed bucket conveyor, approved in 2016 for construction, each with a maximum throughput capacity of 3,000 dry pounds per hour, emissions vent to Extrusion Line 1 Sifter 2;
  - (8) One (1) sifter, approved in 2016 for construction, identified as Extrusion Line 1 Sifter 2, each with a maximum throughput capacity of 3,000 pounds per hour of dry material, emissions controlled by wet scrubber WS1, exhausting to stack S7;
  - (9) One (1) surge hopper, approved in 2016 for construction, identified as 1B, with a maximum throughput capacity of 3,000 pounds per hour, emissions controlled by wet scrubber WS1, exhausting to stack S7; and
  - (10) One (1) docking station for a moveable packaging station, approved in 2016 for construction, identified as 070, with a maximum throughput capacity of 3,000 pounds per hour, emissions controlled by wet scrubber WS1, exhausting to stack S7.
- (o) One (1) Bulk Loadout, identified as Bulk Loadout 2 (BLO2), constructed in 2016 and permitted in 2016, consisting of a sifter and packaging station docking station, with a maximum throughput capacity of 10,000 lbs dry food-grade materials/hour, equipped with a baghouse, identified as BH18, to control particulate emissions from the sifter and from a docked moveable packaging station, exhausting outdoors through stack S3.

### Insignificant Activities

- (b) One (1) natural gas-fired water heater used for process purposes, constructed in 2006, permitted in 2011, with a maximum heat input capacity of 0.66 MMBtu/hr, uncontrolled, exhausting outside the building. [326 IAC 6-2]

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

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

#### D.1.1 Particulate Matter [326 IAC 2-8] [326 IAC 2-2] [326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-8 (Federally Enforceable State Operating Permit (FESOP)), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-1.1-5 (Nonattainment-New Source Review (NA-NSR)) not applicable, the Permittee shall comply with the following emission limitations:

- (a) PM, PM10, and PM2.5 emissions from BH13, controlling emissions from the spray dryer, identified as Spray Dryer 1, exhausting to stack S1 shall not exceed 2.40 lb/hr, where PM10 and PM2.5 include both filterable and condensable PM.
- (b) PM, PM10, and PM2.5 emissions from BH17, controlling emissions from the Liquid & Powder Blending Operation, Bag Dump 1, Bag Dump 2, Mix Tank 1, Mix Tank 2, the Spray Dryer Line 1 packaging station, Breddo Mixer (BM1), and the Powdered Product Conveyor (CV1), exhausting to stack S2, shall not exceed 0.3 lb/hr, where PM10 and PM2.5 include both filterable and condensable PM.
- (c) PM, PM10, and PM2.5 emissions from BH16, controlling emissions from Grinding Mill 1 and Large Receiving Bin, exhausting to stack S4, shall not exceed 0.1 lb/hr, where PM10 and PM2.5 include both filterable and condensable PM.

## DRAFT

- (d) PM, PM10, and PM2.5 emissions from BH15, controlling emissions from the Small Receiving Bin in the Grinding Mill 1 line, exhausting to stack S5, shall not exceed 0.1 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.
- (e) PM, PM10, and PM2.5 emissions from BH14, controlling emissions from the Pilot Spray Dryer, exhausting to stack S6, shall not exceed 0.1 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.
- (f) PM, PM10, and PM2.5 emissions from Wet Scrubber 1 (WS1), controlling emissions from Blend Room 4 and the following portions of Extrusion Line 1: Extrusion Line 1 Sifter, Mixer 3, Surge Hopper 1A, Loss in Weight Feeder F1, enclosed product conveyor, enclosed bucket conveyor, Sifter, Surge Hopper 1B, and Docking Station 070, exhausting to stack S7, shall not exceed 0.8 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.
- (g) PM, PM10, and PM2.5 emissions from Wet Scrubber 2 (WS2), controlling emissions from Extruder 1 and Belt Dryer BD1, exhausting to stack S8, shall not exceed 0.7 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.
- (h) PM, PM10, and PM2.5 emissions from bin vent filter BV1, controlling emissions from the Rail/Truck Unloading Silo, exhausting indoors, shall not exceed 0.4 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.
- (i) PM, PM10, and PM2.5 emissions from BH1, controlling emissions from the Blend Room 1 sifter, exhausting indoors, shall not exceed 0.2 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.
- (j) PM, PM10, and PM2.5 emissions from BH2, controlling emissions from the Blend Room 1 docking station, exhausting indoors, shall not exceed 0.1 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.
- (k) PM, PM10, and PM2.5 emissions from BH3, controlling emissions from the Blend Room 2 sifter, exhausting indoors, shall not exceed 0.2 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.
- (l) PM, PM10, and PM2.5 emissions from BH4, controlling emissions from the Blend Room 2 docking station, exhausting indoors, shall not exceed 0.1 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.
- (m) PM, PM10, and PM2.5 emissions from BH5, controlling emissions from the Re-Pack Room 3 sifter, exhausting indoors, shall not exceed 0.4 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.
- (n) PM, PM10, and PM2.5 emissions from BH6, controlling emissions from the Re-Pack Room 3 docking station, exhausting indoors, shall not exceed 0.1 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.
- (o) PM, PM10, and PM2.5 emissions from BH7, controlling emissions from the Re-Pack Room 2 sifter, exhausting indoors, shall not exceed 0.4 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.
- (p) PM, PM10, and PM2.5 emissions from BH8, controlling emissions from the Re-Pack Room 2 docking station, exhausting indoors, shall not exceed 0.1 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.

## DRAFT

- (q) PM, PM10, and PM2.5 emissions from BH9, controlling emissions from the Bulk Loadout sifter, exhausting indoors, shall not exceed 0.4 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.
- (r) PM, PM10, and PM2.5 emissions from BH10, controlling emissions from the Bulk Loadout docking station, exhausting indoors, shall not exceed 0.3 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.
- (s) PM, PM10, and PM2.5 emissions from BH11, controlling emissions from Rail/Truck Unloading docking station, exhausting indoors, shall not exceed 0.3 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.
- (t) PM, PM10, and PM2.5 emissions from BH12, controlling emissions from the Bailer, exhausting indoors, shall not exceed 0.1 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.
- (u) PM, PM10, and PM2.5 emissions from BH19, controlling emissions from the Grinding Mill 1 docking station and the Re-Pack Room 4 Hopper 1, Sifter 1, and Conveyor 2 filling a docked moveable packaging station, exhausting indoors, shall not exceed 0.8 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.
- (v) PM, PM10, and PM2.5 emissions from BH18, controlling emissions from the Bulk Loadout 2 sifter and docking station, exhausting to stack S3, shall not exceed 0.70 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.

Compliance with these limits, combined with the potential to emit PM, PM10, and direct PM2.5 from all other emission units at this source, shall limit the source-wide total emissions of PM to less than 250 tons per 12 consecutive month period and PM10 and direct PM2.5 to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-1.1-5 (Nonattainment-New Source Review (NA-NSR)) not applicable.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emission from the following units shall not exceed the pounds per hour rate shown in the table below when operating at the process weight rate shown in the table below:

Emission Unit	Control Unit	Process Weight Rate (ton/hr)	PM Emission Limitation (lb/hr)
Baler	BH12	6.25	14.0
Blend Room 1 - Docking Station	BH2	3.13	8.8
Blend Room 1 - Sifter	BH1	3.13	8.8
Blend Room 2 - Docking Station	BH4	3.13	8.8
Blend Room 2 - Sifter	BH3	3.13	8.8
Blend Room 4 - Docking Station 1	WS1	1.56	5.5
Blend Room 4 - Docking Station 2	WS1	1.56	5.5
Blend Room 4 - Surge Hopper 2	WS1	1.56	5.5
Blend Room 4 - Surge Hopper 3	WS1	1.56	5.5
Blend Room 4 - Blender 4	WS1	3.13	8.8
Blend Room 4 - Sifter 1	WS1	1.56	5.5
Blend Room 4 - Sifter 2	WS1	1.56	5.5
Bulk Loadout - Docking Station	BH10	5.00	12.1
Bulk Loadout - Sifter	BH9	5.00	12.1

## DRAFT

Emission Unit	Control Unit	Process Weight Rate (ton/hr)	PM Emission Limitation (lb/hr)
Bulk Loadout 2 - Docking Station	BH18	5.00	12.1
Bulk Loadout 2 - Sifter	BH18	5.00	12.1
Extrusion Line 1 - Belt Dryer BD1	WS2	1.50	5.4
Extrusion Line 1 - Bucket Elevator	WS1	1.50	5.4
Extrusion Line 1 - Closed Conveyor	WS1	1.50	5.4
Extrusion Line 1 - Docking Station	WS1	1.50	5.4
Extrusion Line 1 - Extruder EX1/Cyclone	WS2	1.50	5.4
Extrusion Line 1 - Feeder F1	WS1	1.50	5.4
Extrusion Line 1 - Hopper 1A	WS1	1.50	5.4
Extrusion Line 1 - Hopper 1B	WS1	1.50	5.4
Extrusion Line 1 - Mixer 3	WS1	1.50	5.4
Extrusion Line 1 - Sifter 1	WS1	1.50	5.4
Extrusion Line 1 - Sifter 2	WS1	1.50	5.4
Grinding Mill 1 - Docking Station	BH19	0.75	3.4
Grinding Mill 1 - Large Bin	BH16	0.75	3.4
Grinding Mill 1 - Mill	BH16	0.75	3.4
Grinding Mill 1 - Small Bin	BH15	0.10	0.9
Liquid & Powder - Mixer BM2	BH17	1.56	5.5
Pilot Spray Dryer/Cyclone C0	BH14	0.03	0.551
Rail/Truck Unloading Docking Station	BH11	5.00	12.1
Rail/Truck Unloading Silo	BV1	5.00	12.1
Re-Pack Room 2 - Docking Station	BH8	6.25	14.0
Re-Pack Room 2 - Sifter	BH7	6.25	14.0
Re-Pack Room 3 - Docking Station	BH6	6.25	14.0
Re-Pack Room 3 - Sifter	BH5	6.25	14.0
Re-Pack Room 4 - Docking Station/Conveyor 2	BH19	6.25	14.0
Re-Pack Room 4 - Hopper 1	BH19	6.25	14.0
Spray Dryer Line 1 - Bag Dump 1	BH17	1.25	4.8
Spray Dryer Line 1 - Bag Dump 2	BH17	1.25	4.8
Spray Dryer Line 1 - Breddo Mixer BM1	BH17	2.50	7.6
Spray Dryer Line 1 - Conveyor	BH17	0.93	3.9
Spray Dryer Line 1 - Docking Station	BH17	0.93	3.9
Spray Dryer Line 1 - Mix Tank 1	BH17	1.25	4.8
Spray Dryer Line 1 - Mix Tank 2	BH17	1.25	4.8
Spray Dryer Line 1 / Cyclone C1	BH13	2.50	7.6

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

Interpolation of the data for the process weight up to sixty thousand (60,000) pounds per hour, thirty (30) tons per hour, shall be accomplished by use of the following equation:

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

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

## DRAFT

### D.1.3 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the 0.66 MMBtu/hr natural gas-fired water heater shall be limited to 0.6 pounds per MMBtu heat input.

### D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

## Compliance Determination Requirements [326 IAC 2-8-4(1)]

### D.1.5 Particulate Control

- (a) In order to comply with Condition D.1.1, each baghouse, each wet scrubber, and the bin vent filter for particulate control shall be in operation and control emissions from the associated processes as specified in the table below at all times the associated processes are in operation:

Processes	Control Unit
Spray Dryer 1	BH13
Liquid & Powder Blending Operation, Bag Dump 1, Bag Dump 2, Mix Tank 1, Mix Tank 2, Spray Dryer Line 1 packaging station, Breddo Mixer BM1, Powdered Product Conveyor 1	BH17
Grinding Mill 1 and the Large Receiving Bin	BH16
Re-Pack Room 4 - Small Receiving Bin in the Grinding Mill 1 line	BH15
Pilot Spray Dryer	BH14
Blend Room 4 and the following portions of Extrusion Line 1: Extrusion Line 1 Sifter, Mixer 3, Surge Hopper 1A, Loss in Weight Feeder F1, enclosed product conveyor, enclosed bucket conveyor, Sifter, Surge Hopper 1B, and	WS1
Extrusion Line 1 - Extruder EX1/Cyclone and Belt Dryer BD1	WS2
Rail/Truck Unloading Silo	BV1
Blend Room 1 Sifter	BH1
Blend Room 1 Docking Station	BH2
Blend Room 2 Sifter	BH3
Blend Room 2 Docking Station	BH4
Re-Pack Room 3 Sifter	BH5
Re-Pack Room 3 Docking Station	BH6
Re-Pack Room 2 Sifter	BH7
Re-Pack Room 2 Docking Station	BH8
Bulk Loadout Sifter	BH9
Bulk Loadout Docking Station	BH10

## DRAFT

Processes	Control Unit
Rail/Truck Unloading Docking Station	BH11
Baler	BH12
Bulk Loadout 2 - Sifter and Docking Station	BH18
Grinding Mill 1 Docking Station, and Re-Pack Room 4 Conveyor 2, Docking Station, Sifter 1, Hopper 1	BH19

- (b) In order to comply with Condition D.1.2, the baghouse, wet scrubber, or bin vent filter for particulate control shall be in operation and control emissions from the following processes at all times the associated processes are in operation or are being filled for storage tanks:

Processes	Control Unit
Blend Room 1 - Sifter	BH1
Blend Room 2 - Sifter	BH3
Bulk Loadout - Docking Station	BH10
Bulk Loadout - Sifter	BH9
Bulk Loadout 2 - Sifter and Docking Station	BH18
Extrusion Line 1 - Extruder EX1/Cyclone and Belt Dryer BD1	WS2
Rail/Truck Unloading - Docking Station	BH11
Rail/Truck Unloading - Silo	BV1
Re-Pack Room 2 - Sifter	BH7
Re-Pack Room 3 - Sifter	BH5
Re-Pack Room 4 - Docking Station and Conveyor 2	BH19
Re-Pack Room 4 - Hopper	BH19
Spray Dry Line 1 - Collector Cyclone	BH13

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

### D.1.6 Testing

- (a) In order to demonstrate the compliance status with Conditions D.1.1(a) and D.1.2 and within sixty (60) days of reaching maximum capacity but no later than one hundred and eighty (180) days after initial startup, the Permittee shall perform PM, PM10, and PM2.5 testing on stack S1 from baghouse BH13 controlling Spray Dryer 1 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling

## DRAFT

Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

- (b) In order to demonstrate the compliance status with Conditions D.1.1(g) and D.1.2 and within sixty (60) days of reaching maximum capacity but no later than one hundred and eighty (180) days after initial startup of the Extrusion Line 1 Extruder EX1/Cyclone and Belt Dryer BD1, the Permittee shall perform PM, PM10, and PM2.5 testing on stack S8 from wet scrubber WS2 controlling the Extrusion Line 1 Extruder EX1/Cyclone and Belt Dryer BD1, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

#### D.1.7 Visible Emissions Notations

- (a) Daily visible emission notations of the processes stack exhaust listed in the table below shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

Processes	Control Unit / Stack
Spray Dryer 1	BH13 / S1
Liquid & Powder Blending Operation, Bag Dump 1, Bag Dump 2, Mix Tank 1, Mix Tank 2, Spray Dryer Line 1 packaging station, Breddo Mixer BM1, Powdered Product Conveyor 1	BH17 / S2
Bulk Loadout 2 - Sifter and Docking Station	BH18 / S3
Grinding Mill 1 and the Large Receiving Bin	BH16 / S4
Re-Pack Room 4 Small Receiving Bin in the Grinding Mill 1 line	BH15 / S5
Pilot Spray Dryer	BH14 / S6
Blend Room 4 and the following portions of Extrusion Line 1: Extrusion Line 1 Sifter, Mixer 3, Surge Hopper 1A, Loss in Weight Feeder F1, enclosed product conveyor, enclosed bucket conveyor, Sifter, Surge Hopper 1B, and Docking Station 070	WS1 / S7
Extruder 1 and Belt Dryer BD1	WS2 / S8

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

## DRAFT

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

### D.1.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags or filter cartridges for each of the control devices listed in the table below. All defective bags or cartridges shall be replaced.

Processes	Control Unit / Stack
Rail/Truck Unloading - Silo	BV1
Blend Room 1 - Sifter	BH1
Blend Room 1 - Docking Station	BH2
Blend Room 2 - Sifter	BH3
Blend Room 2 - Docking Station	BH4
Re-Pack Room 3 - Sifter	BH5
Re-Pack Room 3 - Docking Station	BH6
Re-Pack Room 2 - Sifter	BH7
Re-Pack Room 2 - Docking Station	BH8
Bulk Loadout - Sifter	BH9
Bulk Loadout - Docking Station	BH10
Rail/Truck Unloading - Docking Station	BH11
Baler	BH12
Grinding Mill 1 Docking Station, and Re-Pack Room 4 Conveyor 2, Docking Station, Sifter 1, Hopper 1	BH19

### D.1.9 Broken or Failed Bag Detection

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

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

### D.1.10 Parametric Monitoring

- (a) The Permittee shall record the recirculation liquid flow rate of wet scrubber WS1 used in conjunction with the following Blend Room 4 emission units: Sifter 1, Sifter 2, Mixer, Hopper 2, Hopper 3, Dock 1 and Dock 2, and the following Extrusion Line 1 emission units: Sifter 1, Mixer 3, Hopper 1A, Feeder F1, Conveyor, Elevator, Sifter 2, Hopper 1B, and Dock 070, at least once per day when the process is in operation. When for any one reading, the recirculation liquid flow rate of wet scrubber WS1 is below the normal rate, the Permittee shall take a reasonable response. The normal rate for this unit is recirculation flow rate of 300 GPM unless a different lower bound value for this range is determined during the latest stack test. Section C – Response to Excursions and



## DRAFT

Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. A flowrate reading that is outside the above mentioned range is not a deviation from this permit. Failure to take a reasonable response shall be considered a deviation from this permit.

- (b) The Permittee shall record the recirculation liquid flow rate of wet scrubber WS2 used in conjunction with the Extrusion Line 1 cyclone and belt dryer, at least once per day when the process is in operation. When for any one reading, the recirculation liquid flow rate of wet scrubber WS2 is below the normal rate, the Permittee shall take a reasonable response. The normal rate for this unit is recirculation flow rate of 300 GPM unless a different lower bound value for this range is determined during the latest stack test. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. A flowrate reading that is outside the above mentioned range is not a deviation from this permit. Failure to take a reasonable response shall be considered a deviation from this permit.
- (c) The instrument used for determining the flowrate shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated or replaced at least once every six months.

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

#### D.1.11 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.1.7(a), the Permittee shall maintain daily records of the visible emission notations of stack exhaust S1 from BH13, S2 from BH17, S3 from BH18, S4 from BH16, S5 from BH15, S6 from BH14, S7 from WS1, S8 from WS2. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).
- (b) To document the compliance status with Condition D.1.8, the Permittee shall maintain records of the results of the inspections required under Condition D.1.8.
- (c) To document the compliance status with Condition D.1.10(a), the Permittee shall maintain daily records of the scrubber recirculation rate of wet scrubber WS1 used in conjunction with the following Blend Room 4 emission units: Sifter 1, Sifter 2, Mixer, Hopper 2, Hopper 3, Dock 1 and Dock 2, and the following Extrusion Line 1 emission units: Sifter 1, Mixer 3, Hopper 1A, Feeder F1, Conveyor, Elevator, Sifter 2, Hopper 1B, and Dock 070. The Permittee shall include in its daily record when a scrubber recirculation rate reading is not taken and the reason for the lack of a scrubber recirculation rate reading (e.g., the process did not operate that day).
- (d) To document the compliance status with Condition D.1.10(b), the Permittee shall maintain daily records of the scrubber recirculation rate of wet scrubber WS2 used in conjunction with the Extrusion Line 1 cyclone and belt dryer. The Permittee shall include in its daily record when a scrubber recirculation rate reading is not taken and the reason for the lack of a scrubber recirculation rate reading (e.g., the process did not operate that day).
- (e) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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

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

Source Name: PacMoore Process Technologies  
Source Address: 100 PacMoore Parkway, Mooresville, Indiana 46158  
FESOP Permit No.: F109-36436-00062

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: PacMoore Process Technologies  
Source Address: 100 PacMoore Parkway, Mooresville, Indiana 46158  
FESOP Permit No.: F109-36436-00062

**This form consists of 2 pages**

**Page 1 of 2**

- ☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12

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

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

**DRAFT**

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**DRAFT**  
**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE AND ENFORCEMENT BRANCH**  
**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)**  
**QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: PacMoore Process Technologies  
Source Address: 100 PacMoore Parkway, Mooresville, Indiana 46158  
FESOP Permit No.: F109-36436-00062

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

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Page 2 of 2

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

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

**Source Description and Location**

<b>Source Name:</b>	<b>PacMoore Process Technologies</b>
<b>Source Location:</b>	<b>100 PacMoore Parkway, Mooresville, Indiana 46158</b>
<b>County:</b>	<b>Morgan County, Brown Township</b>
<b>SIC Code:</b>	<b>2099 (Food Preparations; Not Elsewhere Classified)</b>
<b>Operation Permit No.:</b>	<b>F109-36436-00062</b>
<b>Operation Permit Issuance Date:</b>	<b>September 26, 2016</b>
<b>Significant Permit Revision No.:</b>	<b>109-37617-00062</b>
<b>Permit Reviewer:</b>	<b>Allen Reimer</b>

On September 14, 2016, the Office of Air Quality (OAQ) received an application from PacMoore Process Technologies related to a modification to an existing stationary dry food grade materials manufacturing facility.

**Existing Approvals**

The source was issued FESOP Renewal No. F109-36436-00062 on September 26, 2016. There have been no subsequent approvals issued.

**County Attainment Status**

The source is located in Morgan County, Brown Township.

Pollutant	Designation
SO <sub>2</sub>	Non-attainment effective October 4, 2013, for the Clay Township and Washington Township. Better than national standards for the remainder of county.
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>	Attainment effective July 11, 2013, 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. Morgan 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>**  
Morgan 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**  
Morgan County, Brown Township has been classified as attainment or unclassifiable in Indiana for SO<sub>2</sub>, CO, PM<sub>10</sub>, NO<sub>2</sub>, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

<b>Fugitive Emissions</b>
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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.

This source contains emission units generating particulate emissions that are controlled by wet scrubbers or baghouses. The collection systems for some of these emission units are not 100% effective in collecting particulate. IDEM, OAQ considers the portion of emissions not collected as "uncollected emissions" and not fugitive emissions. Uncollected emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

<b>Status of the Existing Source</b>
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The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

This PTE table is from the TSD or Appendix A of F109-36436-00062, issued on September 26, 2016.



Potential to Emit of the Entire Source Before Revision (TPY)									
Emission Point (control unit)	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Combined HAP	Single HAP
Rail/Truck Unload Silo (BV1)	1.75	1.75	1.75	0.00	0.00	0.00	0.00	0	0
Blend Room 1 - Sifter (BH1)	3.15	3.15	3.15	0.00	0.00	0.00	0.00	0	0
Blend Room 1 - Dock (BH2)	0.88	0.88	0.88	0.00	0.00	0.00	0.00	0	0
Blend Room 2 - Sifter (BH3)	3.07	3.07	3.07	0.00	0.00	0.00	0.00	0	0
Blend Room 2 - Dock (BH4)	0.88	0.88	0.88	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 3 - Sifter (BH5)	6.31	6.31	6.31	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 3 - Dock (BH6)	1.31	1.31	1.31	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 2 - Sifter (BH7)	6.31	6.31	6.31	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 2 - Dock (BH8)	1.31	1.31	1.31	0.00	0.00	0.00	0.00	0	0
Bulk Loadout - Sifter (BH9)	5.40	5.40	5.40	0.00	0.00	0.00	0.00	0	0
Bulk Loadout - Dock (BH10)	4.75	4.75	4.75	0.00	0.00	0.00	0.00	0	0
Rail/Truck Unload Dock (BH11)	4.75	4.75	4.75	0.00	0.00	0.00	0.00	0	0
Baler (BH12)	0.93	0.93	0.93	0.00	0.00	0.00	0.00	0	0
Spray Dry 1 / Cyclone C1 (BH13)	10.51	10.51	10.51	0.00	0.00	0.00	0.00	0	0
Pilot Spray Dryer (BH14)	0.44	0.44	0.44	0.00	0.00	0.00	0.00	0	0
See note for BH15 for units	0.44	0.44	0.44	0.00	0.00	0.00	0.00	0	0
See note for BH16 for units	0.44	0.44	0.44	0.00	0.00	0.00	0.00	0	0
See note for BH17 for units	4.37	4.37	4.37	0.00	0.00	0.00	0.00	0	0
See note for BH19 for units	12.37	12.37	12.37	0.00	0.00	0.00	0.00	0	0
See note for WS1 for units	11.64	11.64	11.64	0.00	0.00	0.00	0.00	0	0
See note for WS2 for units	3.42	3.42	3.42	0.00	0.00	0.00	0.00	0	0
Natural Gas Combustion	0.08	0.33	0.33	0.03	4.41	0.22	3.70	0.08	0.08
Package marking (LP-1)	3.1E-4	3.1E-4	3.1E-4	0	0	0.04	0	0.02	0
<b>Total PTE of Entire Source</b>	<b>84.52</b>	<b>84.77</b>	<b>84.77</b>	<b>0.03</b>	<b>4.41</b>	<b>0.26</b>	<b>3.70</b>	<b>0.10</b>	<b>0.08</b>
<b>Title V Major Source Thresholds</b>	<b>NA</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>25</b>	<b>10</b>
<b>PSD Major Source Thresholds</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>NA</b>	<b>NA</b>

Note for BH15: Grinding Mill 1 - Small Bin

Note for BH16: Grinding Mill 1 and Large Receiving Bin

Note for BH17: Liquid & Powder-Mixer BM2, Spray Dry 1: Bag Dump 1, Bag Dump 2, Mix Tank 1, Mix Tank 2, Dock, Mixer BM1, and Conveyor

Note for BH19: Grinding Mill 1 - Dock, Re-Pack Room 4 - Conveyor 2, Dock, Hopper 1, and Sifter 1

Note for WS1: Blend Room 4: Sifter 1/2, BR4, Hopper 2/3, Dock 1/2; Extruder 1: Sifter 1/2, Mixer 3, Hopper 1A/B, F1, Conveyor, Elevator, Dock

Note for WS2: Extruder Line 1 - Extruder / Cyclone and Extruder 1 - Belt Dryer

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

### Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by PacMoore Process Technologies on September 14, 2016, relating to the addition of a bulk loadout operation. Additionally, IDEM, OAQ is updating the expiration date on the title page of the permit to show the correct date.

The following is a description of the unpermitted emission unit:

- (a) One (1) Bulk Loadout, identified as Bulk Loadout 2 (BLO2), constructed in 2016 and permitted in 2016, consisting of a sifter and packaging station docking station, with a maximum throughput capacity of 10,000 lbs dry food-grade materials/hour, equipped with a baghouse, identified as BH18, to control particulate emissions from the sifter and from a docked moveable packaging station, exhausting outdoors through stack S3.

### Enforcement Issues

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

### Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

### Permit Level Determination – FESOP Revision

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

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Bulk Loadout 2 - Sifter	72.93	72.93	72.93	-	-	-	-	-	-
Bulk Loadout 2 - Dock	68.77	68.77	68.77	-	-	-	-	-	-
<b>Total PTE of Proposed Revision</b>	<b>141.69</b>	<b>141.69</b>	<b>141.69</b>	-	-	-	-	-	-

1. Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision the construction of new emission units with potential to emit greater than or equal to twenty-five (25) tons per year of PM, PM10, and direct PM2.5, each; and
2. Pursuant to 326 IAC 2-8-11.1(f), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the addition of emissions limitations to preserve the FESOP status of this source.

### PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source, reflecting adjustment of existing limits, with updated emissions shown as **bold** values and previous emissions shown as ~~strike through~~ values.

Limited Potential to Emit of the Entire Source After Issuance (TPY)									
Emission Point (control unit)	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Combined HAP	Single HAP
Rail/Truck Unload Silo (BV1)	1.75	1.75	1.75	0.00	0.00	0.00	0.00	0	0
Blend Room 1 - Sifter (BH1)	3.15	3.15	3.15	0.00	0.00	0.00	0.00	0	0
Blend Room 1 - Dock (BH2)	0.88	0.88	0.88	0.00	0.00	0.00	0.00	0	0
Blend Room 2 - Sifter (BH3)	3.07	3.07	3.07	0.00	0.00	0.00	0.00	0	0
Blend Room 2 - Dock (BH4)	0.88	0.88	0.88	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 3 - Sifter (BH5)	6.31	6.31	6.31	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 3 - Dock (BH6)	1.31	1.31	1.31	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 2 - Sifter (BH7)	6.31	6.31	6.31	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 2 - Dock (BH8)	1.31	1.31	1.31	0.00	0.00	0.00	0.00	0	0
Bulk Loadout - Sifter (BH9)	5.40	5.40	5.40	0.00	0.00	0.00	0.00	0	0
Bulk Loadout - Dock (BH10)	4.75	4.75	4.75	0.00	0.00	0.00	0.00	0	0
Rail/Truck Unload Dock (BH11)	4.75	4.75	4.75	0.00	0.00	0.00	0.00	0	0
Baler (BH12)	0.93	0.93	0.93	0.00	0.00	0.00	0.00	0	0
Spray Dry 1 / Cyclone C1 (BH13)	10.51	10.51	10.51	0.00	0.00	0.00	0.00	0	0
Pilot Spray Dryer (BH14)	0.44	0.44	0.44	0.00	0.00	0.00	0.00	0	0
See note for BH15 for units	0.44	0.44	0.44	0.00	0.00	0.00	0.00	0	0
See note for BH16 for units	0.44	0.44	0.44	0.00	0.00	0.00	0.00	0	0
See note for BH17 for units	4.37	4.37	4.37	0.00	0.00	0.00	0.00	0	0
<b>See note for BH18 for units</b>	<b>10.15</b>	<b>10.15</b>	<b>10.15</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0</b>	<b>0</b>
See note for BH19 for units	12.37	12.37	12.37	0.00	0.00	0.00	0.00	0	0
See note for WS1 for units	11.64	11.64	11.64	0.00	0.00	0.00	0.00	0	0
See note for WS2 for units	3.42	3.42	3.42	0.00	0.00	0.00	0.00	0	0
Natural Gas Combustion	0.08	0.33	0.33	0.03	4.41	0.22	3.70	0.08	0.08
Package marking (LP-1)	3.1E-4	3.1E-4	3.1E-4	0	0	0.04	0	0.02	0
<b>Total PTE of Entire Source</b>	<del>84.52</del> <b>94.67</b>	<del>84.77</del> <b>94.92</b>	<del>84.77</del> <b>94.92</b>	0.03	4.41	0.26	3.70	0.10	0.08
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

Note for BH15: Grinding Mill 1 - Small Bin

Note for BH16: Grinding Mill 1 and Large Receiving Bin

Note for BH17: Liquid & Powder-Mixer BM2, Spray Dry 1: Bag Dump 1, Bag Dump 2, Mix Tank 1, Mix Tank 2, Dock, Mixer BM1, and Conveyor

**Note for BH18: Bulk Loadout 2 - Sifter and Bulk Loadout 2 - Dock**

Note for BH19: Grinding Mill 1 - Dock, Re-Pack Room 4 - Conveyor 2, Dock, Hopper 1, and Sifter 1

Note for WS1: Blend Room 4: Sifter 1/2, BR4, Hopper 2/3, Dock 1/2; Extruder 1: Sifter 1/2, Mixer 3, Hopper 1A/B, F1, Conveyor, Elevator, Dock

Note for WS2: Extruder Line 1 - Extruder / Cyclone and Extruder 1 - Belt Dryer

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

<b>Limited Potential to Emit of the Entire Source After Issuance (TPY)</b>									
<b>Emission Point (control unit)</b>	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>VOC</b>	<b>CO</b>	<b>Combined HAP</b>	<b>Single HAP</b>
Rail/Truck Unload Silo (BV1)	1.75	1.75	1.75	0.00	0.00	0.00	0.00	0	0
Blend Room 1 - Sifter (BH1)	3.15	3.15	3.15	0.00	0.00	0.00	0.00	0	0
Blend Room 1 - Dock (BH2)	0.88	0.88	0.88	0.00	0.00	0.00	0.00	0	0
Blend Room 2 - Sifter (BH3)	3.07	3.07	3.07	0.00	0.00	0.00	0.00	0	0
Blend Room 2 - Dock (BH4)	0.88	0.88	0.88	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 3 - Sifter (BH5)	6.31	6.31	6.31	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 3 - Dock (BH6)	1.31	1.31	1.31	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 2 - Sifter (BH7)	6.31	6.31	6.31	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 2 - Dock (BH8)	1.31	1.31	1.31	0.00	0.00	0.00	0.00	0	0
Bulk Loadout - Sifter (BH9)	5.40	5.40	5.40	0.00	0.00	0.00	0.00	0	0
Bulk Loadout - Dock (BH10)	4.75	4.75	4.75	0.00	0.00	0.00	0.00	0	0
Rail/Truck Unload Dock (BH11)	4.75	4.75	4.75	0.00	0.00	0.00	0.00	0	0
Baler (BH12)	0.93	0.93	0.93	0.00	0.00	0.00	0.00	0	0
Spray Dry 1 / Cyclone C1 (BH13)	10.51	10.51	10.51	0.00	0.00	0.00	0.00	0	0
Pilot Spray Dryer (BH14)	0.44	0.44	0.44	0.00	0.00	0.00	0.00	0	0
See note for BH15 for units	0.44	0.44	0.44	0.00	0.00	0.00	0.00	0	0
See note for BH16 for units	0.44	0.44	0.44	0.00	0.00	0.00	0.00	0	0
See note for BH17 for units	4.37	4.37	4.37	0.00	0.00	0.00	0.00	0	0
See note for BH18 for units	10.15	10.15	10.15	0.00	0.00	0.00	0.00	0	0
See note for BH19 for units	12.37	12.37	12.37	0.00	0.00	0.00	0.00	0	0
See note for WS1 for units	11.64	11.64	11.64	0.00	0.00	0.00	0.00	0	0
See note for WS2 for units	3.42	3.42	3.42	0.00	0.00	0.00	0.00	0	0
Natural Gas Combustion	0.08	0.33	0.33	0.03	4.41	0.22	3.70	0.08	0.08
Package marking (LP-1)	3.1E-4	3.1E-4	3.1E-4	0	0	0.04	0	0.02	0
<b>Total PTE of Entire Source</b>	<b>94.67</b>	<b>94.92</b>	<b>94.92</b>	<b>0.03</b>	<b>4.41</b>	<b>0.26</b>	<b>3.70</b>	<b>0.10</b>	<b>0.08</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

Note for BH15: Grinding Mill 1 - Small Bin

Note for BH16: Grinding Mill 1 and Large Receiving Bin

Note for BH17: Liquid & Powder-Mixer BM2, Spray Dry 1: Bag Dump 1, Bag Dump 2, Mix Tank 1, Mix Tank 2, Dock, Mixer BM1, and Conveyor

Note for BH18: Bulk Loadout 2 - Sifter and Bulk Loadout 2 - Dock

Note for BH19: Grinding Mill 1 - Dock, Re-Pack Room 4 - Conveyor 2, Dock, Hopper 1, and Sifter 1

Note for WS1: Blend Room 4: Sifter 1/2, BR4, Hopper 2/3, Dock 1/2; Extruder 1: Sifter 1/2, Mixer 3, Hopper 1A/B, F1, Conveyor, Elevator, Dock

Note for WS2: Extruder Line 1 - Extruder / Cyclone and Extruder 1 - Belt Dryer

#### FESOP and PSD Minor Status

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

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

Pursuant to 326 IAC 2-8 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following emission limitation:

- (a) PM, PM10, and PM2.5 emissions from BH18, controlling emissions from the Bulk Loadout 2 sifter and docking station, exhausting to stack S3, shall not exceed 0.70 lb/hr, where PM10 and PM2.5 include both filterable and condensable PM.

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

<b>Federal Rule Applicability Determination</b>
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#### New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed revision.

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

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Manufacturing of Nutritional Yeast, 40 CFR 63, Subpart CCCC (326 IAC 20-51), are not included for this proposed revision, since this source is not located at a major source of HAPs as defined in §63.2.
- (c) The requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Prepared Feeds Manufacturing, 40 CFR 63, Subpart DDDDDDD, are not included for this proposed revision, since, although this source is located at an area source of HAPs as defined in §63.2, it does not meet the definition of a prepared feeds manufacturing facility.
- (d) There are no other National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed revision.
- (e) Compliance Assurance Monitoring (CAM)  
Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

<b>State Rule Applicability Determination</b>
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- (a) 326 IAC 2-8-4 (FESOP)  
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the

provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))  
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
This source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year.
- (h) 326 IAC 6.5 PM Limitations Except Lake County  
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.
- (i) 326 IAC 6.8 PM Limitations for Lake County  
This source is not subject to 326 IAC 6.8 because it is not located in Lake County.
- (j) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (k) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

## Bulk Loadout 2

- (l) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)  
 The provisions of 326 IAC 2-4.1 apply to owners or operators who construct or reconstruct a major source of hazardous air pollutants, after July 27, 1997, except as specifically exempted by the rule. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA). PacMoore Process Technologies is an area source of HAP. Therefore, the provisions of 326 IAC 2-4.1 are not included in this revision.
- (m) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
 Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3 are applicable to the Bulk Loadout 2 sifter and docking station, since each has potential particulate emissions greater than five hundred fifty-one thousandths (0.551) pound per hour. Pursuant to 326 IAC 6-3-2(e), the particulate emissions from the Bulk Loadout 2 sifter and docking station shall each not exceed the pounds per hour rate shown in the table below when operating the process weight rate shown in the table below:

Process Step	Control Unit	Process Weight Rate (ton/hr)	Maximum Allowable Emission Rate (lb/hr)
Bulk Loadout 2 - Docking Station	BH18	5.00	12.1
Bulk Loadout 2 - Sifter		5.00	12.1

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

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

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

The baghouse shall be in operation and control emissions from the Bulk Loadout 2 sifter and docking station at all times the Bulk Loadout 2 operation is in operation, in order to comply with this limit.

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

- (a) The compliance monitoring requirements applicable to this proposed revision are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Baghouse BH18 Stack S3	Visible Emissions	Daily	Normal/Abnormal	Response Steps

These monitoring conditions are necessary because the baghouse for the Bulk Loadout 2 sifter and docking station must operate properly to ensure compliance with the requirements of 326 IAC 6-3 and the emission limits that render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable.

## **Proposed Changes**

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

- (1) The title page expiration date has been updated to show the correct expiration date.
- (2) Condition A.2 - Emission Units and Pollution Control Equipment Summary has been revised to incorporate the new units.
- (3) Section D.1 - Emissions Unit Operation Conditions has been revised to incorporate the new units.
- (4) Condition D.1.1 has been revised to include the new particulate matter FESOP limit for the new units.
- (5) Condition D.1.2 has been revised to include the 326 IAC 6-3-2 PM limit for the Bulk Loadout 2 sifter and docking station.
- (6) Condition D.1.5(a) has been revised to include the compliance determination requirements for particulate control to assure that the Bulk Loadout 2 sifter and docking station comply with the requirements of the FESOP PM limit.
- (7) Condition D.1.5(b) has been revised to include the compliance determination requirements for particulate control to assure that the Bulk Loadout 2 sifter and docking station comply with the requirements of the 326 IAC 6-3-2 PM limit.
- (8) Condition D.1.7 - Visible Emission Notations has been revised to include the visible emission notations requirements for the Bulk Loadout 2 sifter and docking station.
- (9) Condition D.1.11(a) - Record Keeping Requirements has been revised to include the visible emission notations recordkeeping requirements for the Bulk Loadout 2 sifter and docking station.

Expiration Date: September 26, ~~2021~~ **2026**

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

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

- (o) **One (1) Bulk Loadout, identified as Bulk Loadout 2 (BLO2), constructed in 2016 and permitted in 2016, consisting of a sifter and packaging station docking station, with a maximum throughput capacity of 10,000 lbs dry food-grade materials/hour, equipped with a baghouse, identified as BH18, to control particulate emissions from the sifter and from a docked moveable packaging station, exhausting outdoors through stack S3.**

\*\*\*

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

\*\*\*

- (o) **One (1) Bulk Loadout, identified as Bulk Loadout 2 (BLO2), constructed in 2016 and permitted in 2016, consisting of a sifter and packaging station docking station, with a maximum throughput capacity of 10,000 lbs dry food-grade materials/hour, equipped with a baghouse, identified as BH18, to control particulate emissions from the sifter and from a docked moveable packaging station, exhausting outdoors through stack S3.**

\*\*\*

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

\*\*\*



D.1.1 Particulate Matter [326 IAC 2-8] [326 IAC 2-2] [326 IAC 2-1.1-5]

\*\*\*

- (v) **PM, PM10, and PM2.5 emissions from BH18, controlling emissions from the Bulk Loadout 2 sifter and docking station, exhausting to stack S3, shall not exceed 0.70 lb/hr, where PM10 and PM2.5 include both filterable and condensible PM.**

Compliance with these limits, combined with the potential to emit PM, PM10, and direct PM2.5 from all other emission units at this source, shall limit the source-wide total emissions of PM to less than 250 tons per 12 consecutive month period and PM10 and direct PM2.5 to less than 100 tons per 12 consecutive month period, **each**, and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-1.1-5 (Nonattainment-New Source Review (NA-NSR)) not applicable.

\*\*\*

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emission from the following units shall not exceed the pounds per hour rate shown in the table below when operating at the process weight rate shown in the table below:

Emission Unit	Control Unit	Process Weight Rate (ton/hr)	PM Emission Limitation (lb/hr)
***	***	***	***
<b>Bulk Loadout 2 - Docking Station</b>	<b>BH18</b>	<b>5.00</b>	<b>12.1</b>
<b>Bulk Loadout 2 - Sifter</b>	<b>BH18</b>	<b>5.00</b>	<b>12.1</b>
***	***	***	***

\*\*\*

D.1.5 Particulate Control

- (a) In order to comply with Condition D.1.1, each baghouse, each wet scrubber, and the bin vent filter for particulate control shall be in operation and control emissions from the associated processes as specified in the table below at all times the associated processes are in operation:

Processes	Control Unit
***	***
<b>Bulk Loadout 2 - Sifter and Docking Station</b>	<b>BH18</b>
***	***

- (b) In order to comply with Condition D.1.2, the baghouse, wet scrubber, or bin vent filter for particulate control shall be in operation and control emissions from the following processes at all times the associated processes are in operation or are being filled for storage tanks:

Processes	Control Unit
***	***
<b>Bulk Loadout 2 - Sifter and Docking Station</b>	<b>BH18</b>
***	***

\*\*\*

#### D.1.7 Visible Emissions Notations

- (a) Daily visible emission notations of the processes stack exhaust listed in the table below shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

Processes	Control Unit / Stack
***	***
<b>Bulk Loadout 2 - Sifter and Docking Station</b>	<b>BH18 / S3</b>
***	***

\*\*\*

#### D.1.11 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.7(a), the Permittee shall maintain daily records of the visible emission notations of stack exhaust S1 from BH13, S2 from BH17, **S3 from BH18**, S4 from BH16, S5 from BH15, S6 from BH14, S7 from WS1, S8 from WS2. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).

\*\*\*

### 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 September 14, 2016.

The construction and operation of this proposed *revision* shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 109-37617-00062. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Allen Reimer at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0863 or toll free at 1-800-451-6027 extension 3-0863.
- (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 to the Technical Support Document (TSD)**  
**Potential to Emit of the Source After Issuance**

**Company Name: PacMoore Process Technologies**

**Address: 100 PacMoore Parkway, Mooresville, Indiana 46158**

**Significant Permit Revision No.: 109-37617-00062**

**Reviewer: Allen Reimer**

Uncontrolled Potential to Emit of the Entire Source After Issuance (TPY)									
Emission Unit (Control Device)	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Combined HAP	Highest Single HAP (Hexane)
Rail/Truck Unload Silo (BV1)	68.77	68.77	68.77	0.00	0.00	0.00	0.00	0	0
Blend Room 1 - Sifter (BH1)	45.58	45.58	45.58	0.00	0.00	0.00	0.00	0	0
Blend Room 1 - Dock (BH2)	8.76	8.76	8.76	0.00	0.00	0.00	0.00	0	0
Blend Room 2 - Sifter (BH3)	43.80	43.80	43.80	0.00	0.00	0.00	0.00	0	0
Blend Room 2 - Dock (BH4)	8.76	8.76	8.76	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 3 - Sifter (BH5)	91.16	91.16	91.16	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 3 - Dock (BH6)	17.52	17.52	17.52	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 2 - Sifter (BH7)	91.16	91.16	91.16	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 2 - Dock (BH8)	17.52	17.52	17.52	0.00	0.00	0.00	0.00	0	0
Bulk Loadout - Sifter (BH9)	72.93	72.93	72.93	0.00	0.00	0.00	0.00	0	0
Bulk Loadout - Dock (BH10)	68.77	68.77	68.77	0.00	0.00	0.00	0.00	0	0
Rail/Truck Unload Dock (BH11)	68.77	68.77	68.77	0.00	0.00	0.00	0.00	0	0
Baler (BH12)	9.86	9.86	9.86	0.00	0.00	0.00	0.00	0	0
Spray Dry 1 / Cyclone C1 (BH13)	175.20	175.20	175.20	0.00	0.00	0.00	0.00	0	0
Pilot Spray Dryer (BH14)	2.00	2.00	2.00	0.00	0.00	0.00	0.00	0	0
Grinding Mill 1 - Small Bin (BH15)	0.28	0.28	0.28	0.00	0.00	0.00	0.00	0	0
Grinding Mill 1 & Large Receiving Bin (BH16)	12.42	12.42	12.42	0.00	0.00	0.00	0.00	0	0
See Note BH17 for Units	61.15	61.15	61.15	0.00	0.00	0.00	0.00	0	0
Grinding Mill 1-Dock, Re-Pack 4 - Convey/Dock Hopper Sifter (BH19)	177.30	177.30	177.30	0.00	0.00	0.00	0.00	0	0
See Note WS1 for Units	203.45	203.45	203.45	0.00	0.00	0.00	0.00	0	0
Extruder Line 1 - Extruder/Cyclone & Extruder 1 - Belt Dryer (WS2)	140.34	140.34	140.34	0.00	0.00	0.00	0.00	0	0
Natural Gas Combustion	0.08	0.33	0.33	0.03	4.41	0.22	3.70	0.08	0.08
Package Marking (LP-1)	3.1E-04	3.1E-04	3.1E-04	0	0	0.04	0	0.02	0
Bulk Loadout 2 - Sifter (BH18)	72.93	72.93	72.93	0.00	0.00	0.00	0.00	0.00	0.00
Bulk Loadout 2 - Dock (BH18)	68.77	68.77	68.77	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total PTE of Entire Source</b>	<b>1,527</b>	<b>1,528</b>	<b>1,528</b>	<b>0.03</b>	<b>4.41</b>	<b>0.26</b>	<b>3.70</b>	<b>0.10</b>	<b>0.08</b>
<b>Title V Major Source Thresholds</b>	<b>NA</b>	<b>100</b>	<b>100</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>25.00</b>	<b>10.00</b>

Note BH17: Liquid & Powder-Mixer BM2, Spray Dry 1: Bag Dump 1, Bag Dump 2, Mix Tank 1, Mix Tank 2, Dock, Mixer BM1, and Conveyor

Note WS1: Blend Room 4: Sifter 1/2, BR4, Hopper 2/3, Dock 1/2; Extruder 1: Sifter 1/2, Mixer 3, Hopper 1A/B, F1, Conveyor, Elevator, Dock 070

(continued on next page)

**Appendix A to the Technical Support Document (TSD)****Potential to Emit of the Source After Issuance**

(continued from previous page)

Controlled Potential to Emit of the Entire Source After Issuance (TPY)									
Emission Unit (Control Device)	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Combined HAP	Highest Single HAP (Hexane)
Rail/Truck Unload Silo (BV1)	1.38	1.38	1.38	0.00	0.00	0.00	0.00	0	0
Blend Room 1 - Sifter (BH1)	3.14	3.14	3.14	0.00	0.00	0.00	0.00	0	0
Blend Room 1 - Dock (BH2)	0.60	0.60	0.60	0.00	0.00	0.00	0.00	0	0
Blend Room 2 - Sifter (BH3)	3.02	3.02	3.02	0.00	0.00	0.00	0.00	0	0
Blend Room 2 - Dock (BH4)	0.60	0.60	0.60	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 3 - Sifter (BH5)	6.29	6.29	6.29	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 3 - Dock (BH6)	1.21	1.21	1.21	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 2 - Sifter (BH7)	6.29	6.29	6.29	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 2 - Dock (BH8)	1.21	1.21	1.21	0.00	0.00	0.00	0.00	0	0
Bulk Loadout - Sifter (BH9)	5.03	5.03	5.03	0.00	0.00	0.00	0.00	0	0
Bulk Loadout - Dock (BH10)	4.74	4.74	4.74	0.00	0.00	0.00	0.00	0	0
Rail/Truck Unload Dock (BH11)	4.74	4.74	4.74	0.00	0.00	0.00	0.00	0	0
Baler (BH12)	0.68	0.68	0.68	0.00	0.00	0.00	0.00	0	0
Spray Dry 1 / Cyclone C1 (BH13)	10.07	10.07	10.07	0.00	0.00	0.00	0.00	0	0
Pilot Spray Dryer (BH14)	0.04	0.04	0.04	0.00	0.00	0.00	0.00	0	0
Grinding Mill 1 - Small Bin (BH15)	0.01	0.01	0.01	0.00	0.00	0.00	0.00	0	0
Grinding Mill 1 & Large Receiving Bin (BH16)	0.25	0.25	0.25	0.00	0.00	0.00	0.00	0	0
See Note BH17 for Units	4.22	4.22	4.22	0.00	0.00	0.00	0.00	0	0
Grinding Mill 1-Dock, Re-Pack 4 - Convey/Dock Hopper Sifter (BH19)	12.23	12.23	12.23	0.00	0.00	0.00	0.00	0	0
See Note WS1 for Units	11.36	11.36	11.36	0.00	0.00	0.00	0.00	0	0
Extruder Line 1 - Extruder/Cyclone & Extruder 1 - Belt Dryer (WS2)	3.16	3.16	3.16	0.00	0.00	0.00	0.00	0	0
Natural Gas Combustion	0.08	0.33	0.33	0.03	4.41	0.22	3.70	0.08	0.08
Package Marking (LP-1)	3.1E-04	3.1E-04	3.1E-04	0	0	0.04	0	0.02	0
Bulk Loadout 2 - Sifter (BH18)	5.03	5.03	5.03	0.00	0.00	0.00	0.00	0.00	0.00
Bulk Loadout 2 - Dock (BH18)	4.74	4.74	4.74	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total PTE of Entire Source</b>	<b>90.15</b>	<b>90.40</b>	<b>90.40</b>	<b>0.03</b>	<b>4.41</b>	<b>0.26</b>	<b>3.70</b>	<b>0.10</b>	<b>0.08</b>
<b>Title V Major Source Thresholds</b>	<b>NA</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>25.00</b>	<b>10.00</b>
<b>PSD Major Source Thresholds</b>	<b>250.00</b>	<b>250.00</b>	<b>250.00</b>	<b>250.00</b>	<b>250.00</b>	<b>250.00</b>	<b>250.00</b>	<b>NA</b>	<b>NA</b>

Note BH17: Liquid &amp; Powder-Mixer BM2, Spray Dry 1: Bag Dump 1, Bag Dump 2, Mix Tank 1, Mix Tank 2, Dock, Mixer BM1, and Conveyor

Note WS1: Blend Room 4: Sifter 1/2, BR4, Hopper 2/3, Dock 1/2; Extruder 1: Sifter 1/2, Mixer 3, Hopper 1A/B, F1, Conveyor, Elevator, Dock 070

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**Appendix A to the Technical Support Document (TSD)**  
**Potential to Emit of the Source After Issuance**  
(continued from previous page)

Limited Potential to Emit of the Entire Source After Issuance (TPY)									
Emission Unit (Control Device)	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Combined HAP	Highest Single HAP (Hexane)
Rail/Truck Unload Silo (BV1)	1.75	1.75	1.75	0.00	0.00	0.00	0.00	0	0
Blend Room 1 - Sifter (BH1)	3.15	3.15	3.15	0.00	0.00	0.00	0.00	0	0
Blend Room 1 - Dock (BH2)	0.88	0.88	0.88	0.00	0.00	0.00	0.00	0	0
Blend Room 2 - Sifter (BH3)	3.07	3.07	3.07	0.00	0.00	0.00	0.00	0	0
Blend Room 2 - Dock (BH4)	0.88	0.88	0.88	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 3 - Sifter (BH5)	6.31	6.31	6.31	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 3 - Dock (BH6)	1.31	1.31	1.31	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 2 - Sifter (BH7)	6.31	6.31	6.31	0.00	0.00	0.00	0.00	0	0
Re-Pack Room 2 - Dock (BH8)	1.31	1.31	1.31	0.00	0.00	0.00	0.00	0	0
Bulk Loadout - Sifter (BH9)	5.40	5.40	5.40	0.00	0.00	0.00	0.00	0	0
Bulk Loadout - Dock (BH10)	4.75	4.75	4.75	0.00	0.00	0.00	0.00	0	0
Rail/Truck Unload Dock (BH11)	4.75	4.75	4.75	0.00	0.00	0.00	0.00	0	0
Baler (BH12)	0.93	0.93	0.93	0.00	0.00	0.00	0.00	0	0
Spray Dry 1 / Cyclone C1 (BH13)	10.51	10.51	10.51	0.00	0.00	0.00	0.00	0	0
Pilot Spray Dryer (BH14)	0.44	0.44	0.44	0.00	0.00	0.00	0.00	0	0
Grinding Mill 1 - Small Bin (BH15)	0.44	0.44	0.44	0.00	0.00	0.00	0.00	0	0
Grinding Mill 1 & Large Receiving Bin (BH16)	0.44	0.44	0.44	0.00	0.00	0.00	0.00	0	0
See Note BH17 for Units	4.37	4.37	4.37	0.00	0.00	0.00	0.00	0	0
Grinding Mill 1-Dock, Re-Pack 4 - Convey/Dock Hopper Sifter (BH19)	12.37	12.37	12.37	0.00	0.00	0.00	0.00	0	0
See Note WS1 for Units	11.64	11.64	11.64	0.00	0.00	0.00	0.00	0	0
Extruder Line 1 - Extruder/Cyclone & Extruder 1 - Belt Dryer (WS2)	3.42	3.42	3.42	0.00	0.00	0.00	0.00	0	0
Natural Gas Combustion	0.08	0.33	0.33	0.03	4.41	0.22	3.70	0.08	0.08
Package Marking (LP-1)	3.1E-04	3.1E-04	3.1E-04	0	0	0.04	0	0.02	0
Bulk Loadout 2 - Sifter (BH18)	5.40	5.40	5.40	0.00	0.00	0.00	0.00	0.00	0.00
Bulk Loadout 2 - Dock (BH18)	4.75	4.75	4.75	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total PTE of Entire Source</b>	<b>94.67</b>	<b>94.92</b>	<b>94.92</b>	<b>0.03</b>	<b>4.41</b>	<b>0.26</b>	<b>3.70</b>	<b>0.10</b>	<b>0.08</b>
<b>Title V Major Source Thresholds</b>	<b>NA</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>25.00</b>	<b>10.00</b>
<b>PSD Major Source Thresholds</b>	<b>250.00</b>	<b>250.00</b>	<b>250.00</b>	<b>250.00</b>	<b>250.00</b>	<b>250.00</b>	<b>250.00</b>	<b>NA</b>	<b>NA</b>

Note BH17: Liquid & Powder-Mixer BM2, Spray Dry 1: Bag Dump 1, Bag Dump 2, Mix Tank 1, Mix Tank 2, Dock, Mixer BM1, and Conveyor

Note WS1: Blend Room 4: Sifter 1/2, BR4, Hopper 2/3, Dock 1/2; Extruder 1: Sifter 1/2, Mixer 3, Hopper 1A/B, F1, Conveyor, Elevator, Dock 070

# Appendix A to the Technical Support Document (TSD)

## Potential to Emit of Revision - New Equipment

**Company Name:** PacMoore Process Technologies

**Address:** 100 PacMoore Parkway, Mooresville, Indiana 46158

**Significant Permit Revision No.:** 109-37617-00062

**Reviewer:** Allen Reimer

### PTE of Modification - Process Emissions

Potential to Emit Particulate - PM, PM10, and Direct PM2.5				
Emission Unit	Throughput	Emission Factor	PTE (TPY)	Emission Factor Sources
Bulk Loadout 2 - Sifter	10,000 lb/hr	3.33 lb/ton	72.93	Assumed the same as Extrusion 1 Mixer
Bulk Loadout 2 - Dock	10,000 lb/hr	3.14 lb/ton	68.77	AP-42, Ch. 11.12, Table 11.12-2, SCC 3-05-011-17

**Total:** 141.69

PTE of Modification - Combined Emissions		
Pollutant	Process Emissions	
PM	141.69	TPY
PM10	141.69	TPY
Direct PM2.5	141.69	TPY
SO2	0.00	TPY
NOx	0.00	TPY
VOC	0.00	TPY
CO	0.00	TPY

**Appendix A to the Technical Support Document (TSD)  
Emissions from External Stacks**

Company Name: PacMoore Process Technologies  
Address: 100 PacMoore Parkway, Mooresville, Indiana 46158  
Significant Permit Revision No.: 109-37617-00062  
Reviewer: Allen Reimer

Stack S1 - PM, PM10 and Direct PM2.5 Emissions														
Emission Unit	Control	Stack	Throughput	Emission Factor	PTE (TPY)	Capture Efficiency	Captured Emissions (TPY)	Un-Captured Emissions (TPY)	Control Efficiency	Controlled PTE (TPY)	Controlled + Uncaptured (TPY)	BH Limit (lb/hr)	BH Limit + Uncaptured (TPY)	Emission Factor Source
Spray Dry 1 / Cyclone C1	BH13	S1	2,000 lb/hr	40.00 lb/ton	175.20	100%	175.20	0.00	94.25%	10.07	10.07	2.4	10.51	Permittee Mass Balance
<b>10.07</b>														

Stack S2 - PM, PM10 and Direct PM2.5 Emissions														
Emission Unit	Control	Stack	Throughput	Emission Factor	PTE (TPY)	Capture Efficiency	Captured Emissions (TPY)	Un-Captured Emissions (TPY)	Control Efficiency	Controlled PTE (TPY)	Controlled + Uncaptured (TPY)	BH Limit (lb/hr)	BH Limit + Uncaptured (TPY)	Emission Factor Source
Liquid & Powder - Mixer BM2	BH17	S2	2,406 lb/hr	3.33 lb/ton	17.55	95%	16.67	0.88	98%	0.33	1.21	0.3	4.37	Assumed same as Extrusion Mixer
Spray Dry 1 - Bag Dump 1			1,000 lb/hr	3.33 lb/ton	7.29	95%	6.93	0.36	98%	0.14	0.50			AP-42, Ch. 11.12, Table 11.12-2, SCC 3-05-011-07
Spray Dry 1 - Bag Dump 2			1,000 lb/hr	3.33 lb/ton	7.29	95%	6.93	0.36	98%	0.14	0.50			AP-42, Ch. 11.12, Table 11.12-2, SCC 3-05-011-07
Spray Dry 1 - Mix Tank 1			1,000 lb/hr	0.73 lb/ton	1.60	95%	1.52	0.08	98%	0.03	0.11			Assumed same as Extrusion Mixer
Spray Dry 1 - Mix Tank 2			1,000 lb/hr	0.73 lb/ton	1.60	95%	1.52	0.08	98%	0.03	0.11			Assumed same as Extrusion Mixer
Spray Dry 1 - Dock			1,863 lb/hr	0.64 lb/ton	2.61	95%	2.48	0.13	98%	0.05	0.18			Assumed same as Extrusion Dock
Spray Dry 1 - Mixer BM1			2,000 lb/hr	3.33 lb/ton	14.59	95%	13.86	0.73	98%	0.28	1.01			Permittee Mass Balance
Spray Dry 1 - Conveyor			1,790 lb/hr	2.20 lb/ton	8.62	95%	8.19	0.43	98%	0.16	0.60			SCC 3-05-016-27, AP-42, Ch. 11.17, Table 11.17-4
Summary					61.15		58.09	3.06		1.16	4.22			

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**Appendix A to the Technical Support Document (TSD)**  
**Emissions from External Stacks**

(continued from previous page)

Stack S3 - PM, PM10 and Direct PM2.5 Emissions														
Emission Unit	Control	Stack	Throughput	Emission Factor	PTE (TPY)	Capture Efficiency	Captured Emissions (TPY)	Un-Captured Emissions (TPY)	Control Efficiency	Controlled PTE (TPY)	Controlled + Uncaptured (TPY)	BH Limit (lb/hr)	BH Limit + Uncaptured (TPY)	Notes
Bulk Loadout 2 - Sifter	BH18	S3	10,000 lb/hr	3.33 lb/ton	72.93	95%	69.28	3.65	98%	1.39	5.03	0.4	5.40	Assumed the same as Extrusion 1 Mixer
Bulk Loadout 2 - Dock			10,000 lb/hr	3.14 lb/ton	68.77	95%	65.33	3.44	98%	1.31	4.74	0.3	4.75	AP-42, Ch. 11.12, Table 11.12-2, SCC 3-05-011-17
Summary					141.69		134.61	7.08		2.69	9.78	0.70	10.15	

Stack S4 - PM, PM10 and Direct PM2.5 Emissions														
Emission Unit	Control	Stack	Throughput	Emission Factor	PTE (TPY)	Capture Efficiency	Captured Emissions (TPY)	Un-Captured Emissions (TPY)	Control Efficiency	Controlled PTE (TPY)	Controlled + Uncaptured (TPY)	BH Limit (lb/hr)	BH Limit + Uncaptured (TPY)	Emission Factor Source
Grinding Mill 1	BH16	S4	1,500 lb/hr	3.14 lb/ton	10.31	100%	10.31	0.00	98%	0.21	0.21	0.1	0.44	AP-42, Ch. 11.12, Table 11.12-2, SCC 3-05-011-17
Large Receiving Bin			1,500 lb/hr	0.64 lb/ton	2.10	100%	2.10	0.00	98%	0.04	0.04			Assumed the same as Extrusion Surge Hopper
Summary					12.42		12.42	0.00		0.25	0.25			

Stack S5 - PM, PM10 and Direct PM2.5 Emissions														
Emission Unit	Control	Stack	Throughput	Emission Factor	PTE (TPY)	Capture Efficiency	Captured Emissions (TPY)	Un-Captured Emissions (TPY)	Control Efficiency	Controlled PTE (TPY)	Controlled + Uncaptured (TPY)	BH Limit (lb/hr)	BH Limit + Uncaptured (TPY)	Emission Factor Source
Grinding Mill 1 - Small Bin	BH15	S5	200 lb/hr	0.64 lb/ton	0.28	100%	0.28	0.00	98%	0.01	0.01	0.1	0.44	Assumed the same as Extrusion Surge Hopper
Summary					0.28		0.28	0.00		0.01	0.01			

Stack S6 - PM, PM10 and Direct PM2.5 Emissions														
Emission Unit	Control	Stack	Throughput	Emission Factor	PTE (TPY)	Capture Efficiency	Captured Emissions (TPY)	Un-Captured Emissions (TPY)	Control Efficiency	Controlled PTE (TPY)	Controlled + Uncaptured (TPY)	BH Limit (lb/hr)	BH Limit + Uncaptured (TPY)	Emission Factor Source
Pilot Spray Dryer	BH14	S6	60 lb/hr	15.22 lb/ton	2.00	100%	2.00	0.00	98%	0.04	0.04	0.1	0.44	Permittee Mass Balance
Summary					2.00		2.00	0.00		0.04	0.04			

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**Appendix A to the Technical Support Document (TSD)**  
**Emissions from External Stacks**

(continued from previous page)

Stack S8 - PM, PM10 and Direct PM2.5 Emissions																
Emission Unit	Control	Stack	Throughput		Emission Factor		PTE (TPY)	Capture Efficiency	Captured Emissions (TPY)	Un-Captured Emissions (TPY)	Control Efficiency	Controlled PTE (TPY)	Controlled + Uncaptured (TPY)	WS2 Limit (lb/hr)	WS2 Limit + Uncaptured (TPY)	Emission Factor Source
Extruder Line 1 - Extruder/Cyclone	WS2	S8	3,000	lb/hr	20.00	lb/ton	131.40	100%	131.40	0.00	98%	2.63	2.63	0.7	3.42	Permittee Mass Balance
Extruder 1 - Belt Dryer			3,000	lb/hr	1.36	lb/ton	8.94	96%	8.58	0.36	98%	0.17	0.53			Permittee Mass Balance
Plastic Belt Conveyor (BC1)			3,000	lb/hr	0.00	lb/ton	0.00	100%	0.00	0.00	100%	0.00	0.00			Permittee Mass Balance
Plastic Belt Conveyor (BC2)			3,000	lb/hr	0.00	lb/ton	0.00	100%	0.00	0.00	100%	0.00	0.00			Permittee Mass Balance
Summary							140.34		139.98	0.36		2.80	3.16			

Stack S7 - PM, PM10 and Direct PM2.5 Emissions															
Emission Unit	Control	Stack	Throughput	Emission Factor	PTE (TPY)	Capture Efficiency	Captured Emissions (TPY)	Un-Captured Emissions (TPY)	Control Efficiency	Controlled PTE (TPY)	Controlled + Uncaptured (TPY)	WS1 Limit (lb/hr)	WS1 Limit + Uncaptured (TPY)	Emission Factor Source	
Blend Room 4 - Sifter 1	WS1	S7	3,125 lb/hr	3.20 lb/ton	21.90	96%	21.02	0.88	98.35%	0.35	1.22	0.8	11.64	Permittee Mass Balance	
Blend Room 4 - Sifter 2			3,125 lb/hr	3.20 lb/ton	21.90	96%	21.02	0.88	98.35%	0.35	1.22			Permittee Mass Balance	
Blend Room 4 - Mixer BR4			6,250 lb/hr	2.20 lb/ton	30.11	96%	28.91	1.20	98.35%	0.48	1.68			AP-42, Ch. 11.17-4, Table 11.17-4, 2/98	
Blend Room 4 - Hopper 2			3,125 lb/hr	0.64 lb/ton	4.38	96%	4.20	0.18	98.35%	0.07	0.24			Permittee Mass Balance	
Blend Room 4 - Hopper 3			3,125 lb/hr	0.64 lb/ton	4.38	96%	4.20	0.18	98.35%	0.07	0.24			Permittee Mass Balance	
Blend Room 4 - Dock 1			3,125 lb/hr	0.64 lb/ton	4.38	96%	4.20	0.18	98.35%	0.07	0.24			Permittee Mass Balance	
Blend Room 4 - Dock 2			3,125 lb/hr	0.64 lb/ton	4.38	96%	4.20	0.18	98.35%	0.07	0.24			Permittee Mass Balance	
Extruder 1 - Sifter 1			3,000 lb/hr	3.30 lb/ton	21.68	96%	20.81	0.87	98.35%	0.34	1.21			Permittee Mass Balance	
Extruder 1 - Mixer 3			3,000 lb/hr	3.30 lb/ton	21.68	96%	20.81	0.87	98.35%	0.34	1.21			Permittee Mass Balance	
Extruder 1 - Hopper 1A			3,000 lb/hr	0.68 lb/ton	4.47	96%	4.29	0.18	98.35%	0.07	0.25			Permittee Mass Balance	
Extruder 1 - Feeder F1			3,000 lb/hr	0.68 lb/ton	4.47	96%	4.29	0.18	98.35%	0.07	0.25			Permittee Mass Balance	
Extruder 1 - Conveyor			3,000 lb/hr	2.20 lb/ton	14.45	96%	13.88	0.58	98.35%	0.23	0.81			AP-42, Ch. 11.17-4, Table 11.17-4, 2/98	
Extruder 1 - Elevator			3,000 lb/hr	2.20 lb/ton	14.45	96%	13.88	0.58	98.35%	0.23	0.81			AP-42, Ch. 11.17-4, Table 11.17-4, 2/98	
Extruder 1 - Sifter 2			3,000 lb/hr	3.33 lb/ton	21.88	96%	21.00	0.88	98.35%	0.35	1.22			Permittee Mass Balance	
Extruder 1 - Hopper 1B			3,000 lb/hr	0.68 lb/ton	4.47	96%	4.29	0.18	98.35%	0.07	0.25			Permittee Mass Balance	
Extruder 1 - Dock 070			3,000 lb/hr	0.68 lb/ton	4.47	96%	4.29	0.18	98.35%	0.07	0.25			Permittee Mass Balance	
Summary					203.45		195.31	8.14		3.22	11.36				

**Appendix A to the Technical Support Document (TSD)  
Emissions from Indoor Vents**

**Company Name: PacMoore Process Technologies**  
**Address: 100 PacMoore Parkway, Mooresville, Indiana 46158**  
**Significant Permit Revision No.: 109-37617-00062**  
**Reviewer: Allen Reimer**

PM, PM10 and Direct PM2.5 Emissions													
Emission Unit	Control	Throughput	Emission Factor	PTE (TPY)	Capture Efficiency	Captured Emissions (TPY)	Un-Captured Emissions (TPY)	Control Efficiency	Controlled PTE (TPY)	Controlled + Uncaptured (TPY)	BH Limit (lb/hr)	BH Limit + Uncaptured (TPY)	Notes
Rail/Truck Unload Silo	BV1	10,000 lb/hr	3.14 lb/ton	68.77	100%	68.77	0.00	98%	1.38	1.38	0.4	1.75	AP-42, Ch. 11.12, Table 11.12-2, SCC 3-05-011-17
Blend Room 1 - Sifter	BH1	6,250 lb/hr	3.33 lb/ton	45.58	95%	43.30	2.28	98%	0.87	3.14	0.2	3.15	Assumed the same as Extrusion 1 Mixer
Blend Room 1 - Dock	BH2	6,250 lb/hr	0.64 lb/ton	8.76	95%	8.32	0.44	98%	0.17	0.60	0.1	0.88	Assumed the same as Blend Room 4
Blend Room 2 - Sifter	BH3	6,250 lb/hr	3.20 lb/ton	43.80	95%	41.61	2.19	98%	0.83	3.02	0.2	3.07	Assumed the same as Blend Room 4
Blend Room 2 - Dock	BH4	6,250 lb/hr	0.64 lb/ton	8.76	95%	8.32	0.44	98%	0.17	0.60	0.1	0.88	Assumed the same as Blend Room 4
Re-Pack Room 3 - Sifter	BH5	12,500 lb/hr	3.33 lb/ton	91.16	95%	86.60	4.56	98%	1.73	6.29	0.4	6.31	Assumed the same as Extrusion 1 Mixer
Re-Pack Room 3 - Dock	BH6	12,500 lb/hr	0.64 lb/ton	17.52	95%	16.64	0.88	98%	0.33	1.21	0.1	1.31	Assumed the same as Blend Room 4
Re-Pack Room 2 - Sifter	BH7	12,500 lb/hr	3.33 lb/ton	91.16	95%	86.60	4.56	98%	1.73	6.29	0.4	6.31	Assumed the same as Extrusion 1 Mixer
Re-Pack Room 2 - Dock	BH8	12,500 lb/hr	0.64 lb/ton	17.52	95%	16.64	0.88	98%	0.33	1.21	0.1	1.31	Assumed the same as Blend Room 4
Bulk Loadout - Sifter	BH9	10,000 lb/hr	3.33 lb/ton	72.93	95%	69.28	3.65	98%	1.39	5.03	0.4	5.40	Assumed the same as Extrusion 1 Mixer
Bulk Loadout - Dock	BH10	10,000 lb/hr	3.14 lb/ton	68.77	95%	65.33	3.44	98%	1.31	4.74	0.3	4.75	AP-42, Ch. 11.12, Table 11.12-2, SCC 3-05-011-17
Rail/Truck Unload Dock	BH11	10,000 lb/hr	3.14 lb/ton	68.77	95%	65.33	3.44	98%	1.31	4.74	0.3	4.75	AP-42, Ch. 11.12, Table 11.12-2, SCC 3-05-011-17
Baler	BH12	12,500 lb/hr	0.36 lb/ton	9.86	95%	9.36	0.49	98%	0.19	0.68	0.1	0.93	SCC 3-05-089-88, 95% control, AP-42, Ch.11.26
Grinding Mill 1 - Dock	BH19	1,500 lb/hr	0.64 lb/ton	2.10	95%	2.00	0.11	98%	0.04	0.15	0.8	12.37	Assumed same as other docks
Re-Pack Room 4 - Hopper		12,500 lb/hr	3.2 lb/ton	87.60	95%	83.22	4.38	98%	1.66	6.04			Assumed the same as Blend Room 4
Re-Pack Room 4 - Sifter		12,500 lb/hr	0 lb/ton	0.00	95%	0.00	0.00	98%	0.00	0.00			Closed System
Re-Pack Room 4 - Conveyor/Dock		12,500 lb/hr	3.2 lb/ton	87.60	95%	83.22	4.38	98%	1.66	6.04			Assumed the same as Blend Room 4
Summary				790.64		754.55	36.09		15.09	51.18	3.90	53.2	

**Appendix A to the Technical Support Document (TSD)**  
**Potential to Emit - Miscellaneous Natural Gas Combustion**

**Company Name: PacMoore Process Technologies**

**Address: 100 PacMoore Parkway, Mooresville, Indiana 46158**

**Significant Permit Revision No.: 109-37617-00062**

**Reviewer: Allen Reimer**

<b>Heat Input Capacity</b>			
Spray Dryer 1 Heater	6.40 MMBtu/hr	1,020.00 MMBtu/MMCF	Heating Value of Natural Gas
Belt Dryer BD1	3.00 MMBtu/hr	88.12 MMCF/yr	Potential Throughput
Boiler 1	0.20 MMBtu/hr	89,877.60 MMBtu/yr	Potential Throughput
Water Heater	0.66 MMBtu/hr		
Total Heat Input Capacity	10.26 MMBtu/hr		

Pollutant	Throughput		Emission Factor		PTE (TPY)	Source
PM	88.12	MMCF/yr	1.9	lb/MMCF	0.08	Applicant Request, > AP-42
PM10	88.12	MMCF/yr	7.6	lb/MMCF	0.33	AP-42, Ch. 1.4, Table 1.4-2, 7/98
Direct PM2.5	88.12	MMCF/yr	7.6	lb/MMCF	0.33	AP-42, Ch. 1.4, Table 1.4-2, 7/98
SO2	88.12	MMCF/yr	0.6	lb/MMCF	0.03	AP-42, Ch. 1.4, Table 1.4-2, 7/98
NOx	88.12	MMCF/yr	100	lb/MMCF	4.41	AP-42, Ch. 1.4, Table 1.4-1, 7/98
VOC	88.12	MMCF/yr	5	lb/MMCF	0.22	AP-42, Ch. 1.4, Table 1.4-2, 7/98
CO	88.12	MMCF/yr	84	lb/MMCF	3.70	AP-42, Ch. 1.4, Table 1.4-1, 7/98

Pollutant	Throughput		Emission Factor		PTE (TPY)	Source
Benzene	88.12	MMCF/yr	2.10E-03	lb/MMCF	9.25E-05	AP-42, Ch. 1.4, Table 1.4-3, 7/98
Dichlorobenzene	88.12	MMCF/yr	1.20E-03	lb/MMCF	5.29E-05	AP-42, Ch. 1.4, Table 1.4-3, 7/98
Formaldehyde	88.12	MMCF/yr	7.50E-02	lb/MMCF	3.30E-03	AP-42, Ch. 1.4, Table 1.4-3, 7/98
Hexane	88.12	MMCF/yr	1.80	lb/MMCF	0.08	AP-42, Ch. 1.4, Table 1.4-3, 7/98
Toluene	88.12	MMCF/yr	3.40E-03	lb/MMCF	1.50E-04	AP-42, Ch. 1.4, Table 1.4-3, 7/98
Cadmium	88.12	MMCF/yr	5.00E-04	lb/MMCF	2.20E-05	AP-42, Ch. 1.4, Table 1.4-4, 7/98
Chromium	88.12	MMCF/yr	1.40E-03	lb/MMCF	6.17E-05	AP-42, Ch. 1.4, Table 1.4-4, 7/98
Lead	88.12	MMCF/yr	5.00E-04	lb/MMCF	2.20E-05	AP-42, Ch. 1.4, Table 1.4-4, 7/98
Manganese	88.12	MMCF/yr	3.80E-04	lb/MMCF	1.67E-05	AP-42, Ch. 1.4, Table 1.4-4, 7/98
Nickel	88.12	MMCF/yr	2.10E-03	lb/MMCF	9.25E-05	AP-42, Ch. 1.4, Table 1.4-4, 7/98

**Combined HAP (TPY) =** 0.08

**Single HAP - Hexane (TPY) =** 0.08

**Methodology:**

- Throughput (MMCF/yr) = Input (MMBtu/hr) x 8,760 hr/yr x 1 MMCF/1,020 MMBtu
- Throughput (MMBtu/yr) = Input (MMBtu/hr) x 8,760 hr/yr
- PTE (TPY) = Emission Factor (kg/MMBtu) x 2.2046 lb/kg x input (MMBtu/yr) x 1 ton/2,000 lb
- PTE (TPY) = Emission Factor (lb/MMCF) x input (MMCF/yr) x 1 ton/2,000 lb

**Appendix A to the Technical Support Document (TSD)**  
**326 IAC 6-3-2 - Particulate Matter (PM) Emission Limitations**

**Company Name:** PacMoore Process Technologies  
**Address:** 100 PacMoore Parkway, Mooresville, Indiana 46158  
**Significant Permit Revision No.:** 109-37617-00062  
**Reviewer:** Allen Reimer

Emission Unit	Control Device ID	Process Weight Rate (ton/hr)	PM Emission Limitation (lb/hr)	Uncontrolled PM PTE (lb/hr)	PM Control Required
Baler	BH12	6.25	14.0	2.25	NO
Blend Room 1 - Docking Station	BH2	3.13	8.8	2.00	NO
Blend Room 1 - Mixer (no vents)	no vents	no vents	no vents	no vents	no vents
<b>Blend Room 1 - Sifter</b>	<b>BH1</b>	<b>3.13</b>	<b>8.8</b>	<b>10.41</b>	<b>Yes</b>
Blend Room 2 - Docking Station	BH4	3.13	8.8	2.00	NO
Blend Room 2 - Mixer (no vents)	no vents	no vents	no vents	no vents	no vents
<b>Blend Room 2 - Sifter</b>	<b>BH3</b>	<b>3.13</b>	<b>8.8</b>	<b>10.00</b>	<b>Yes</b>
Blend Room 4 - Docking Station 1	WS1	1.56	5.5	1.00	NO
Blend Room 4 - Docking Station 2		1.56	5.5	1.00	NO
Blend Room 4 - Surge Hopper 2		1.56	5.5	1.00	NO
Blend Room 4 - Surge Hopper 3		1.56	5.5	1.00	NO
Blend Room 4 - Blender BR4		3.13	8.8	6.88	NO
Blend Room 4 - Sifter 1		1.56	5.5	5.00	NO
Blend Room 4 - Sifter 2		1.56	5.5	5.00	NO
<b>Bulk Loadout - Docking Station</b>	<b>BH10</b>	<b>5.00</b>	<b>12.1</b>	<b>15.70</b>	<b>Yes</b>
<b>Bulk Loadout - Sifter</b>	<b>BH9</b>	<b>5.00</b>	<b>12.1</b>	<b>16.65</b>	<b>Yes</b>
<b>Bulk Loadout 2 - Docking Station</b>	<b>BH18</b>	<b>5.00</b>	<b>12.1</b>	<b>15.70</b>	<b>Yes</b>
<b>Bulk Loadout 2 - Sifter</b>		<b>5.00</b>	<b>12.1</b>	<b>16.65</b>	<b>Yes</b>
<b>Extruder Line 1 - Belt Dryer BD1</b>	<b>WS2</b>	<b>1.50</b>	<b>5.4</b>	<b>0.00</b>	<b>NO</b>
Extruder Line 1 - Bucket Elevator	WS1	1.50	5.4	3.30	NO
Extruder Line 1 - Open Conveyor		1.50	5.4	3.30	NO
Extruder Line 1 - Docking Station		1.50	5.4	1.02	NO
<b>Extruder Line 1 - Extruder EX1/Cyclone 070</b>	<b>WS2</b>	<b>1.50</b>	<b>5.4</b>	<b>30.00</b>	<b>Yes</b>
Extruder Line 1 - Loss in Weight Feeder F1	WS1	1.50	5.4	1.02	NO
Extruder Line 1 - Surge Hopper 1A		1.50	5.4	1.02	NO
Extruder Line 1 - Surge Hopper 1B		1.50	5.4	1.02	NO
Extruder Line 1 - Mixer 3		1.50	5.4	4.95	NO
Extruder Line 1 - Sifter 1		1.50	5.4	4.95	NO
Extruder Line 1 - Sifter 2		1.50	5.4	5.00	NO
Grinding Mill 1 - Docking Station	BH19	0.75	3.4	0.48	NO
Grinding Mill 1 - Large Bin	BH16	0.75	3.4	0.48	NO
Grinding Mill 1 - Mill		0.75	3.4	2.36	NO
Grinding Mill 1 - Small Bin	BH15	0.10	0.9	0.06	NO
Liquid & Powder - Mixer BM2	BH17	1.56	5.5	4.01	NO
Pilot Spray Dryer/Cyclone C0	BH14	0.03	0.551	0.46	NO
<b>Rail/Truck Unloading Docking Station</b>	<b>BH11</b>	<b>5.00</b>	<b>12.1</b>	<b>15.70</b>	<b>Yes</b>
<b>Rail/Truck Unloading Silo</b>	<b>BV1</b>	<b>5.00</b>	<b>12.1</b>	<b>15.70</b>	<b>Yes</b>
Re-Pack Room 2 - Docking Station	BH8	6.25	14.0	4.00	NO
<b>Re-Pack Room 2 - Sifter</b>	<b>BH7</b>	<b>6.25</b>	<b>14.0</b>	<b>20.81</b>	<b>Yes</b>
Re-Pack Room 3 - Docking Station	BH6	6.25	14.0	4.00	NO
<b>Re-Pack Room 3 - Sifter</b>	<b>BH5</b>	<b>6.25</b>	<b>14.0</b>	<b>20.81</b>	<b>Yes</b>
Re-Pack Room 4 - Docking Station	BH19	6.25	14.0	20.00	<b>Yes</b>
Re-Pack Room 4 - Hopper		6.25	14.0	87.60	<b>Yes</b>
Re-Pack Room 4 - Sifter		6.25	14.0	0.00	NO
Spray Dry 1 - Bag Dump 1	BH17	1.25	4.8	1.67	NO
Spray Dry 1 - Bag Dump 2		1.25	4.8	1.67	NO
Spray Dry 1 - Breddo Mixer BM1		2.50	7.6	3.33	NO
Spray Dry 1 - Conveyor		0.93	3.9	1.97	NO
Spray Dry 1 - Docking Station		0.93	3.9	0.60	NO
Spray Dry 1 - Mix Tank 1		1.25	4.8	0.37	NO
Spray Dry 1 - Mix Tank 2		1.25	4.8	0.37	NO
<b>Spray Dry 1 / Cyclone C1</b>	<b>BH13</b>	<b>2.50</b>	<b>7.6</b>	<b>40.00</b>	<b>Yes</b>

**Notes:**

- (a) Pursuant to 326 IAC 6-3-2(e)(2), the allowable PM emission rate for an emission unit when the process weight rate is less than 100 pounds per hour (0.05 ton/hr) is 0.551 pound per hour.

**Methodology:**

- 1) PM Emission Limitation (lb/hr) = 4.10 x (process weight rate (ton/hr) ^ 0.67)

**Appendix A: Emissions Calculations**  
**VOC and Particulate**  
**From Surface Coating Operations - Package Marking (LP-1)**

**Company Name: PacMoore Process Technologies**  
**Source Address: 100 PacMoore Parkway, Mooresville, Indiana 46158**  
**Permit Number: 109-37617-00062**  
**Reviewer: Allen Reimer**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Annual Average (gallon/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
VersaPrint V300	9.09	90.00%	0.00%	90.00%	0.00%	10.00%	5.37E-04	8.18	8.18	4.39E-03	0.11	0.02	1.07E-04	81.81	95%
ScanTrue II	8.34	80.00%	0.00%	80.00%	0.00%	20.00%	5.55E-04	6.67	6.67	3.70E-03	0.09	0.02	2.03E-04	33.36	95%

**Total Potential to Emit**

**Add worst case coating to all solvents**

**8.10E-03**

**0.19**

**0.04**

**3.10E-04**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solid: (Volatile Density - 7.36 lb/gallon)

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emissions Calculations  
Hazardous Air Pollutants (HAPs)  
From Surface Coating Operations - Package Marking (LP-1)**

**Company Name:** PacMoore Process Technologies  
**Source Address:** 100 PacMoore Parkway, Mooresville, Indiana 46158  
**Permit Number:** 109-37617-00062  
**Reviewer:** Allen Reimer

<b>Organic HAP</b>								
Material	Density (Lb/Gal)	Material (gallon/hr)	Weight % Hydroquinone	Weight % Triethylene Glycol	Weight % Butoxytriglycol	Hydroquinone (ton/yr)	Triethylene Glycol (ton/yr)	Butoxytriglycol (ton/yr)
VersaPrint V300	8.34	5.37E-04		70.00%	30.00%	0.00	0.01	0.01
ScanTrue II	9.09	5.55E-04	0.20%			4.42E-05		
			123-31-9	112-27-6 (glycol ether)	143-22-6 (glycol ether)	<b>4.42E-05</b>	<b>0.01</b>	<b>0.01</b>
<b>Total Potential Emissions</b>								

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

<b>Metal HAP</b>							
Material	Density (Lb/Gal)	Gallons of Material (gallon/hr)	Mass Flow Coating (lb/hr)	Mass % Solvent Black 29	Mass % of Chromium III in Black 29	PTE Chromium III (lb/hr)	PTE Chromium III (TPY)
VersaPrint V300	8.34	5.37E-04	4.48E-03	10%	6.6%	2.96E-05	1.29E-04

**Total HAP                      0.02 TPY**

**METHODOLOGY**

Black 29 contains 6.6% chromium III

Usage provided by applicant

VersaPrint V300 contains 10% by mass of Solvent Black 29

PTE Chromium III (lb/hr) = mass flow coating (lb/hr) x Mass % Solvent Black 29 x Mass % of Chromium III in Black 29

mass flow of coating (lb/hr) = density (lb/gallon) x gallons of material (gallon/hr)

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

**Company Name:** PacMoore Process Technologies  
**Source Address:** 100 PacMoore Parkway, Mooresville, Indiana 46158  
**Permit Number:** 109-37617-00062  
**Reviewer:** Allen Reimer

**Paved Roads at Industrial Site**

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Truck Load/Unload - Enter - One Way	20.0	2.0	40.0	30.0	1200.0	1161.6	0.22	8.8	3212.0
Truck Load/Unload - Exit - One Way	20.0	2.0	40.0	30.0	1200.0	1161.6	0.22	8.8	3212.0
Vehicle - Traffic Entrance - Enter - One Way	140.0	3.0	420.0	4.15	1743.0	106	0.02	8.4	3077.6
Vehicle - Traffic Entrance - Exit - One Way	140.0	3.0	420.0	4.15	1743.0	106	0.02	8.4	3077.6
Vehicle - Parking Lot - Enter - One Way	120.0	4.0	480.0	2.0	960.0	264	0.05	24.0	8760.0
Vehicle - Parking Lot - Exit - One Way	120.0	4.0	480.0	2.0	960.0	264	0.05	24.0	8760.0
<b>Totals</b>			<b>1,880.0</b>		<b>7,806.0</b>			<b>82.5</b>	<b>30,099.2</b>

Average Vehicle Weight Per Trip = 4.2 tons/trip  
Average Miles Per Trip = 0.04 miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	4.2	4.2	4.2	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,  $E_{ext} = E_f * [1 - (p/4N)]$  (Equation 2 from AP-42 13.2.1)

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

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f$ =	0.372	0.074	0.0182	lb/mile
Mitigated Emission Factor, $E_{ext}$ =	0.340	0.068	0.0167	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Truck Load/Unload - Enter - One Way	0.60	0.12	0.03	0.55	0.11	0.03
Truck Load/Unload - Exit - One Way	0.60	0.12	0.03	0.55	0.11	0.03
Vehicle - Traffic Entrance - Enter - One Way	0.57	0.11	0.03	0.52	0.10	0.03
Vehicle - Traffic Entrance - Exit - One Way	0.57	0.11	0.03	0.52	0.10	0.03
Vehicle - Parking Lot - Enter - One Way	1.63	0.33	0.08	1.49	0.30	0.07
Vehicle - Parking Lot - Exit - One Way	1.63	0.33	0.08	1.49	0.30	0.07
<b>Totals</b>	<b>5.59</b>	<b>1.12</b>	<b>0.27</b>	<b>5.11</b>	<b>1.02</b>	<b>0.25</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)  
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

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



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

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

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

October 14, 2016

Chris Hallman  
PacMoore Process Technologies  
100 PacMoore Pkwy  
Mooresville, IN 46158

Re: Public Notice  
PacMoore Process Technologies  
Permit Level: FESOP - Significant Permit Revision  
Permit Number: 109 - 37617 - 00062

Dear Chris Hallman:

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

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Martinsville Daily Reporter-Times in Mooresville, IN publish the abbreviated version of the public notice no later than October 19, 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 Mooresville Public Library, 220 W Harrison St in Mooresville 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 Allen Reimer, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-0863 or dial (317) 233-0863.

Sincerely,

*Len Pogost*

Len Pogost  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter 2/17/2016





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Governor

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Commissioner

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

October 14, 2016

Martinsville Daily Reporter-Times  
Attn: Classifieds  
P.O. Box 308  
Mooresville, Indiana 46158

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for PacMoore Process Technologies, Morgan County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than October 19, 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: FESOP - Significant Permit Revision  
Permit Number: 109 - 37617 - 00062

Enclosure  
PN Newspaper.dot 6/13/2013



# Indiana Department of Environmental Management

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Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

October 14, 2016

To: Mooresville Public Library 220 W Harrison St Mooresville 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: PacMoore Process Technologies**  
**Permit Number: 109 - 37617 - 00062**

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

**October 14, 2016**  
**PacMoore Process Technologies**  
**109 - 37617 - 00062**

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 10/14/2016 PacMoore Process Technologies 109 - 37617 - 00062 draft			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

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		Chris Hallman PacMoore Process Technologies 100 PacMoore Pkwy Mooresville IN 46158 (Source CAATS)									
2		Adam Rawlins Plant Manager PacMoore Process Technologies 100 PacMoore Pkwy Mooresville IN 46158 (RO CAATS)									
3		Morgan County Commissioners 180 South Main Street Martinsville IN 46151 (Local Official)									
4		Mooresville Town Council 4 E Harrison Street Mooresville IN 46158 (Local Official)									
5		Mooresville Public Library 220 W Harrison St Mooresville IN 46158-1633 (Library)									
6		Clayton D. & Patricia A. Arthur 5178 Brenda Boulevard Greenwood IN 46143 (Affected Party)									
7		Morgan County Health Department 180 S Main Street, Suite 252 Martinsville IN 46151-1988 (Health Department)									
8		David Jones 7977 N. Taylors Rd. Mooresville IN 46158 (Affected Party)									
9		Claudia Parker 6761 Centenary Rd. Mooresville IN 46158 (Affected Party)									
10		James Swails 6568 E. Rosebud Lane Mooresville IN 46158 (Affected Party)									
11		John Thurston 6548 E. Watson Mooresville IN 46158 (Affected Party)									
12		Mr. David Dempsey Trinity Consultants 7330 Woodland Drive, Suite 225 Indianapolis IN 46278 (Consultant)									
13											
14											
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