



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

Eric J. Holcomb
Governor

Bruno L. Pigott
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.: 109-40318-00062

The Indiana Department of Environmental Management (IDEM) has received an application from PacMoore Process Technologies, located at 100 PacMoore 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 relating to the construction and operation of new emission units at Re-Pack Room 4, and the addition of existing unpermitted units, modifying existing emission units and description changes to existing emission units.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). 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 natural gas and maintenance units have been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft FESOP SPR 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-Central 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/>.

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

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

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 109-40318-00062 in all correspondence.

Comments should be sent to:

Mehul Sura
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Mehul Sura
Or dial directly: (317) 233-6868
Fax: (317) 232-6749 attn: Mehul Sura
E-mail: msura@idem.IN.gov

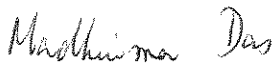
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have 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 Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

What will happen after IDEM makes a decision?

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

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


Madhurima D. Moulik, Ph.D., Section Chief
Permits Branch
Office of Air Quality



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

Eric J. Holcomb
Governor

DRAFT

Bruno L. Pigott
Commissioner

Joe Williams
PacMoore Process Technologies
100 PacMoore Parkway
Mooresville, Indiana 46158

Re: 109-40318-00062
Significant Revision to
F109-36436-00062

Dear Mr. Williams

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 August 13, 2018, the Office of Air Quality (OAQ) received an application from the source requesting the construction and operation of new emission units, modifying existing emission units, and description changes to existing emission units. 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 units are approved for construction at the source:

- (a) Re-Pack Room 4 (RP4)
One (1) Dump Station (Dump Station 2), one (1) Hopper (Hopper 2), and one (1) Conveyor (Conveyor 2), approved in 2018 for construction, with a maximum throughput of 1,250 lbs food grade material per hour, using a baghouse, identified as BH19, to control particulate emissions, exhausting inside the building. Out of the 1,250 lbs of material, 625 lbs will be liquid and 625 lbs will be dry.
- (b) Re-Pack Room 3 (RP3)
One (1) Coating system, approved in 2018 for construction, consisting of one (1) coating reel, one (1) hopper, and one (1) moveable packaging station, with a maximum throughput capacity of 1,875 lbs of dry food grade materials/hour, equipped with a baghouse, identified as BH6, to control particulate emissions from a docked moveable packaging station docking station, exhausting inside the building.
- (c) One (1) moveable packaging station, identified as 00173, approved in 2018 for construction, with a maximum throughput capacity of 3,000 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.

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

DRAFT

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.

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/>. A copy of the permit is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/ide/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/ide/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 regarding this matter, please contact Mehul Sura, 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) 233-6868 or (800) 451-6027, and ask for Mehul Sura.

Sincerely,

Madhurima D. Moulik, Ph.D., 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



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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

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

DRAFT

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 Master Agency Interest ID: 103536	
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 on November 11, 2016

Minor Permit Revision No. 109-40295-00062, issued on September 6, 2018

Significant Permit Revision No. 109-40318-00062	
Issued by: Madhurima D. Moulik, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: September 26, 2026

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	4
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]	
SECTION B	GENERAL CONDITIONS	11
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]	
SECTION C	SOURCE OPERATION CONDITIONS.....	20
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	20
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]	
	Testing Requirements [326 IAC 2-8-4(3)].....	22
C.9	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	22
C.10	Compliance Requirements [326 IAC 2-1.1-11]	
	Compliance Monitoring Requirements [326 IAC 2-8-4(1)] [326 IAC 2-8-5(a)(1)]	23
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)]	

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]	23
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]	
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]	24
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]	
Stratospheric Ozone Protection	26
C.18 Compliance with 40 CFR 82 and 326 IAC 22-1	
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS	27
Emission Limitations and Standards [326 IAC 2-8-4(1)]	31
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)]	
Compliance Determination Requirements [326 IAC 2-8-4(1)]	35
D.1.5 Particulate Control	
D.1.6 Testing	
Compliance Monitoring Requirements [326 IAC 2-8-4(1)] [326 IAC 2-8-5(a)(1)]	38
D.1.7 Visible Emissions Notations	
D.1.8 Baghouse Inspections	
D.1.9 Broken or Failed Bag Detection	
D.1.10 Parametric Monitoring	
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]	40
D.1.11 Record Keeping Requirements	
CERTIFICATION	41
EMERGENCY OCCURRENCE REPORT	42
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT	44

SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary dry 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 ₂ 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)]

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 two (2) sifters, 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 sifters, 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 two (2) sifters, 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 sifters, 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 (RP3), including the following:
 - (1) One (1) sifter and packaging station docking station constructed in 2010 and permitted in 2011, 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.
 - (2) One (1) Coating system approved in 2018 for construction, consisting of one (1) coating reel, (1) hopper, and (1) moveable packaging station, with a maximum throughput capacity of 1,875 lbs of dry food grade materials/hour, equipped with a baghouse, identified as BH6, to control particulate emissions from a docked moveable packaging station docking station, exhausting inside the building.
- (g) One (1) Re-Pack Room, identified as Re-Pack Room 4 (RP4), including the following:
 - (1) One (1) packaging station docking station, constructed in 2013, with a maximum throughput capacity of 1,500 lbs dry food grade materials per hour, using a baghouse, identified as BH19, exhausting inside the building to control particulate emissions from the small receiving bin, exhausting to stack S5.
 - (2) One (1) Dump Station, one (1) Hopper, and one (1) Conveyor, approved in 2018 for construction, with a maximum throughput of 1,250 lbs food grade material per hour, using a baghouse, identified as BH19, to control particulate emissions, exhausting inside the building. Out of the 1,250 lbs of material, 625 lbs will be liquid and 625 lbs will be dry.
 - (3) One (1) Dump Station 2, one (1) Hopper 2, and one (1) Conveyor 2, approved in 2018 for construction, with a maximum throughput of 1,250 lbs food grade material per hour, using a baghouse, identified as BH19, to control particulate emissions, exhausting inside the building. Out of the 1,250 lbs of material, 625 lbs will be liquid and 625 lbs will be dry.
- (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 two (2) baghouses, identified as BH11 and BH20, 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) mix tanks, identified as Mix Tank 1 and Mix Tank 2, constructed in 2012, for storing slurry;
 - (2) 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;
 - (3) 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;
 - (4) 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
 - (5) 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.
 - (6) One (1) closed sifter, constructed in 2015, with a maximum throughput of 1,790 lb/hr.
 - (7) One (1) Spray Dry Sifter, identified as Spray Dry 1, approved in 2018 for construction with a maximum throughput of 1,790 pounds per hour, 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 1,500 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 large 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 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, 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 BH11, exhausting indoors to control particulate emissions from the sifter and BH18, exhausting outdoors through stack S3, to control particulate emissions from a docked moveable packaging station.

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

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

- (a) Paved roads with no controls.
- (b) One (1) natural gas-fired Water Heater, identified as Water Heater 2, constructed in 2016, with a maximum capacity of 0.35 MMBtu/hour, using no control equipment, and exhausting to the atmosphere.
- (c) One (1) natural gas-fired boiler, identified as Boiler, constructed in 2010, with a maximum capacity of 4.31 MMBtu/hour, using no control equipment, and exhausting to the atmosphere.
- (d) One (1) natural gas-fired air makeup unit, constructed in 2016, with a maximum capacity of 2.49 MMBtu/hour, using no control equipment, and exhausting to the atmosphere.

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

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

- (a) Fifteen (15) 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;
- (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.
- (15) one (1) moveable packaging station, identified as 00173, approved for construction in 2018, 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.

- (b) Two (2) maintenance welding stations, identified as MW1 , each including the following:
 - (1) One (1) metal inert gas (MIG) welding unit, constructed in 2010, with a maximum capacity of 0.50 pounds of electrode per hour, using no control equipment, and exhausting indoors.
 - (2) One (1) tungsten inert gas (TIG) welding unit, constructed in 2010, with a maximum capacity of 0.50 pounds of electrode per hour, using no control equipment, and exhausting indoors.
 - (3) One (1) stick welding unit, constructed in 2010, with a maximum capacity of 0.50 pounds of electrode per hour, using no control equipment, and exhausting indoors.
- (c) One (1) maintenance drill press, identified as MDP1, constructed in 2010, with a maximum capacity of 12 pounds of metal parts per hour, using no control equipment, and exhausting indoors.
- (d) One (1) maintenance grinding station, identified as MG1, including the following:
 - (1) One (1) maintenance disk grinder, constructed in 2014, with a maximum capacity of 10 pounds of metal parts per hour, using no control equipment, and exhausting indoors.
 - (2) One (1) maintenance bench grinder, constructed in 2010 with a maximum capacity of 12 pounds of metal parts per hour, using no control equipment, and exhausting indoors.
- (e) One (1) maintenance sandblaster, identified as MSB1, constructed in 2017, with a maximum flow rate of 50 pounds per hour, using baghouse for control, and exhausting indoors.

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).

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

- (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)]

- (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)]

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)]

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

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

The Permittee shall implement the PMPs.

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

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(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.

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

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

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

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

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

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

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

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

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

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

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

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

B.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.

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]

- (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)]

- (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.

- (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]

- (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]

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

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

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

and

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

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

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

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

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

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

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]

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

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

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

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

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

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

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

B.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]

- (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]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), 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.

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

- (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]

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

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

- (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)]

- (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]

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]

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

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

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

C.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.

(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]

- (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.

Stratospheric Ozone Protection

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

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

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) blend room, identified as Blend Room 1, constructed in 2006 and permitted in 2011, consisting of two (2) sifters, 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 sifters, 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 two (2) sifters, 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 sifters, 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 (RP3), including the following:
 - (1) One sifter and packaging station docking station constructed in 2010 and permitted in 2011, 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.
 - (2) One (1) Coating system approved in 2018 for construction, consisting of one (1) coating reel, (1) hopper, and (1) moveable packaging station, with a maximum throughput capacity of 1,875 lbs of dry food grade materials/hour, equipped with a baghouse, identified as BH6, to control particulate emissions from a docked moveable packaging station docking station, exhausting inside the building.
- (g) One (1) Re-Pack Room, identified as Re-Pack Room 4 (RP4), including the following:

- (1) One (1) packaging station docking station, constructed in 2013, with a maximum throughput capacity of 1,500 lbs dry food grade materials per hour, using a baghouse, identified as BH19, exhausting inside the building to control particulate emissions from the small receiving bin, exhausting to stack S5.
- (2) One (1) Dump Station, one (1) Hopper, and one (1) Conveyor, approved in 2018 for construction, with a maximum throughput of 1,250 lbs food grade material per hour, using a baghouse, identified as BH19, to control particulate emissions, exhausting inside the building. Out of the 1,250 lbs of material, 625 lbs will be liquid and 625 lbs will be dry.
- (3) One (1) Dump Station 2, one (1) Hopper 2, and one (1) Conveyor 2, approved in 2018 for construction, with a maximum throughput of 1,250 lbs food grade material per hour, using a baghouse, identified as BH19, to control particulate emissions, exhausting inside the building. Out of the 1,250 lbs of material, 625 lbs will be liquid and 625 lbs will be dry.
- (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 two (2) baghouses, identified as BH11 and BH20, 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) 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;
 - (2) 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;

- (3) 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;
- (4) 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
- (5) 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.
- (6) One (1) closed sifter, constructed in 2015, with a maximum throughput of 1,790 lb/hr.
- (7) One (1) Spray Dry Sifter, identified as Spray Dry 1, approved in 2018 for construction with a maximum throughput of 1,790 pounds per hour, 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 1,500 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;
 - (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 BH11, exhausting indoors to control particulate emissions from the sifter and BH18, exhausting outdoors through stack S3, to control particulate emissions from a docked moveable packaging station.

Insignificant Activities

- (b) One (1) natural gas-fired Water Heater, identified as Water Heater 2, constructed in 2016, with a maximum capacity of 0.35 MMBtu/hour, using no control equipment, and exhausting to the atmosphere.
- (c) One (1) natural gas-fired boiler, identified as Boiler, constructed in 2010, with a maximum capacity of 4.31 MMBtu/hour, using no control equipment, and exhausting to the atmosphere.
- (d) One (1) natural gas-fired air makeup unit, constructed in 2016, with a maximum capacity of 2.49 MMBtu/hour, using no control equipment, and exhausting to the atmosphere.

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

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:

Process/Unit	Control ID	Stack ID	PM limit (lb/hr)	PM10 limit* (lb/hr)	PM2.5 limit* (lb/hr)
Blend Room 1 sifters	BH1	indoors	0.2	0.2	0.2
Blend Room 1 docking station	BH2	indoors	0.1	0.1	0.1
Blend Room 2 sifters	BH3	indoors	0.2	0.2	0.2
Blend Room 2 docking station,	BH4	indoors	0.1	0.1	0.1
Re-Pack Room 3 sifter	BH5	indoors	0.4	0.4	0.4
Re-Pack Room 3 docking station, coating system	BH6	indoors	0.1	0.1	0.1
Re-Pack Room 2 sifter	BH7	indoors	0.4	0.4	0.4
Re-Pack Room 2 docking station	BH8	indoors	0.1	0.1	0.1
Bulk Loadout sifter	BH9	indoors	0.4	0.4	0.4
Bulk Loadout docking station	BH10	indoors	0.3	0.3	0.3
Rail/Truck Unloading - packaging station docking station, Bulk Loadout 2 (BLO2) sifter	BH11 and BH20	BH11 - indoors S3	0.7	0.7	0.7
Bailer,	BH12	indoors	0.1	0.1	0.1
Spray dryer, identified as Spray Dryer 1	BH13	S1	2.4	2.4	2.4

Pilot Spray Dryer	BH14	S6	0.1	0.1	0.1
Small Receiving Bin in the Grinding Mill 1 line	BH15	S5	0.1	0.1	0.1
Grinding Mill 1 and Large Receiving Bin	BH16	S4	0.1	0.1	0.1
Liquid & Powder Blending Operation, the Spray Dryer Line 1 packaging station, Breddo Mixer (BM1), and the Powdered Product Conveyor (CV1)	BH17	S2	0.3	0.3	0.3
Bulk Loadout 2 (BLO2) docked moveable packaging station.	BH18	S3	0.3	0.3	0.3
Grinding Mill 1 docking station and the Re-Pack Room 4 packaging station docking station, Hoppers, Dump Stations, and Conveyors,	BH19	indoors	0.8	0.8	0.8
Blend Room 4, Extrusion Line 1 Sifters 1 and 2, Mixer 3, Surge Hopper 1A, Loss in Weight Feeder F1, Open vibratory	WS1	S7	0.8	0.8	0.8

conveyor and one (1) enclosed bucket conveyor, Surge Hopper 1B, and Docking Station 070					
Extruder 1 and Belt Dryer BD1	WS2	S8	0.7	0.7	0.7
Rail/Truck Unloading Silo	Bin vent filter BV1	indoors	0.4	0.4	0.4

*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
Bulk Loadout 2 - Docking Station	BH18	5.00	12.1
Bulk Loadout 2 - Sifter	BH11	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 & BH20	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 3 - Dock 2	BH6	0.94	3.9
Re-Pack Room 4 - Docking Station/Conveyor 1	BH19	0.31	1.9
Re-Pack Room 4 - Hopper 1	BH19	0.31	1.9

Emission Unit	Control Unit	Process Weight Rate (ton/hr)	PM Emission Limitation (lb/hr)
Re-Pack Room 4 - Dump Station 1	BH19	0.31	1.9
Re-Pack Room 4 - Docking Station/Conveyor 2	BH19	0.31	1.9
Re-Pack Room 4 - Hopper 2	BH19	0.31	1.9
Re-Pack Room 4 - Dump Station 2	BH19	0.31	1.9
Spray Dryer Line 1 - Bag Dump 1	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
Spray Dryer Line 1 - Sifter	BH17	0.90	3.8
Maintenance Sand Blaster (MSB1)	Baghouse	0.030	0.551

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.

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 0.35 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, the baghouse, wet scrubber, or bin vent filter each baghouse, 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, Spray Dryer Line 1 packaging station, Breddo Mixer BM1, Powdered Product Conveyor 1, Sifter 1	BH17

Processes	Control Unit
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 & BH20
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 3 Dock 2	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
Bulk Loadout 2 - Sifter	BH11
Baler	BH12
Bulk Loadout 2 - Docking Station	BH18
Grinding Mill 1 Docking Station, and Re-Pack Room 4 Conveyor 1, Docking Station, Hopper 1, Dump Station 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
Bulk Loadout - Docking Station	BH10

Processes	Control Unit
Bulk Loadout - Sifter	BH9
Bulk Loadout 2 - Sifter and Docking Station	BH11
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
Bulk Loadout 2 (BLO2) docked moveable packaging station	BH18
Re-Pack Room 4 - Docking Station and Conveyor 1	BH19
Re-Pack 4 - Dump Station 1	BH19
Re-Pack Room 4 - Hopper 1	BH19
Spray Dry Line 1 - Collector Cyclone	BH13
Rail/Truck Unloading Silo	BH20
Maintenance Sand Blaster (MSB1)	Baghouse

- (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 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 scrubbers WS1 and 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, Spray Dryer Line 1 packaging station, Breddo Mixer BM1, Powdered Product Conveyor 1, Sifter 1	BH17 / S2
Bulk Loadout 2 - Sifter	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 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 & BH20
Blend Room 1 - Sifter	BH1
Blend Room 1 - Docking Station	BH2
Blend Room 2 - Sifter	BH3

Processes	Control Unit / Stack
Blend Room 2 - Docking Station	BH4
Re-Pack Room 3 - Sifter	BH5
Re-Pack Room 3 - Docking Station	BH6
Re-Pack Room 3 - Dock 2	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 1, Docking Station, Hopper 1, Dump Station 1, Hopper 2, Conveyor/Dock 2, Dump Station 2	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 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

- (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, 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 dates, results, and corrective actions taken for each 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.

**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:

**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

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) 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:

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

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

Source Description and Location
--

Source Name:	PacMoore Process Technologies
Source Location:	100 PacMoore Parkway, Mooresville, IN 46158
County:	Morgan, Clay Township
SIC Code:	2099 (Food Preparations, Not Elsewhere Classified)
Operation Permit No.:	F 109-36436-00062
Operation Permit Issuance Date:	September 26, 2018
Significant Permit Revision No.:	109-40318-00062
Permit Reviewer:	Brendan Smith/Mehul Sura

Existing Approvals

The source was issued FESOP Renewal No. F109-36436-00062 on September 26, 2016. The source has since received the following approval:

- (a) FESOP Significant Permit Revision No.: 109-37617-00062, issued on November 11, 2016.
- (b) FESOP Minor Permit Revision No: 109-40295-00062, issued on September 06, 2018.

County Attainment Status

The source is located in Morgan County, Clay Township.

Pollutant	Designation
SO ₂	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 ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Attainment effective July 11, 2013, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Morgan County has been designated as

attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
Morgan County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **SO₂**
U.S. EPA, in the Federal Register Notice 78 FR 47191 dated August 5, 2013, designated Morgan County, Clay Township as nonattainment for SO₂. Therefore, SO₂ emissions were reviewed pursuant to the requirements of Emission Offset, 326 IAC 2-3.
IAC 2-3.
- (d) **Other Criteria Pollutants**
Morgan County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), 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.

Greenhouse Gas (GHG) Emissions

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

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

Source Status - Existing Source

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

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Combined HAPs
Rail/Truck Unload Silo (BV1)	1.75	1.75	1.75	0	0	0	0	0	0
Blend Room 1 - Sifter (BH1)	3.15	3.15	3.15	0	0	0	0	0	0
Blend Room 1 - Dock (BH2)	0.88	0.88	0.88	0	0	0	0	0	0
Blend Room 2 - Sifter (BH3)	3.07	3.07	3.07	0	0	0	0	0	0
Blend Room 2 - Dock (BH4)	0.88	0.88	0.88	0	0	0	0	0	0
Re-Pack Room 3 - Sifter (BH5)	6.31	6.31	6.31	0	0	0	0	0	0
Re-Pack Room 3 - Dock (BH6)	1.31	1.31	1.31	0	0	0	0	0	0
Re-Pack Room 2 - Sifter (BH7)	6.31	6.31	6.31	0	0	0	0	0	0
Re-Pack Room 2 - Dock (BH8)	1.31	1.31	1.31	0	0	0	0	0	0
Bulk Loadout - Sifter (BH9)	5.40	5.40	5.40	0	0	0	0	0	0
Bulk Loadout - Dock (BH10)	4.75	4.75	4.75	0	0	0	0	0	0
Rail/Truck Unload Dock (BH11)	4.75	4.75	4.75	0	0	0	0	0	0
Baler (BH12)	0.93	0.93	0.93	0	0	0	0	0	0
Spray Dry 1 / Cyclone C1 (BH13)	10.51	10.51	10.51	0	0	0	0	0	0
Pilot Spray Dryer (BH14)	0.44	0.44	0.44	0	0	0	0	0	0
Grinding Mill 1 - Small Bin (BH15)	0.44	0.44	0.44	0	0	0	0	0	0
Grinding Mill 1 & Large Receiving Bin (BH16)	0.44	0.44	0.44	0	0	0	0	0	0
See Note BH17 for Units	4.37	4.37	4.37	0	0	0	0	0	0
Grinding Mill 1-Dock, Re-Pack 4 - Convey/Dock Hopper Sifter (BH19)	4.27	4.27	4.27	0	0	0	0	0	0
See Note WS1 for Units	11.64	11.64	11.64	0	0	0	0	0	0
Extruder Line 1 - Extruder/Cyclone & Extruder 1 - Belt Dryer (WS2)	3.42	3.42	3.42	0	0	0	0	0	0

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Combined HAPs
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 (BH11)	5.40	5.40	5.40	0	0	0	0	0	0
Bulk Loadout 2 - Dock (BH18)	4.75	4.75	4.75	0	0	0	0	0	0
Total PTE of Entire Source	86.57	86.82	86.82	0.03	4.41	0.26	3.70	0.10	0.08
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
¹ Under the Part 70 Permit program (40 CFR 70), PM ₁₀ and PM _{2.5} , not particulate matter (PM), are each considered as a "regulated air pollutant." ² PM _{2.5} listed is direct PM _{2.5} . ³ Single highest source-wide HAP.									

Note BH17: Liquid & Powder-Mixer BM2, Spray Dry 1, 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

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3), because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (c) These emissions are based on the TSD of FESOP MPR No.: F109-40295-00062, issued on September 06, 2018.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by PacMoore Process Technologies on August 13, 2018, relating to the construction and operation of new emission units, modifying existing emission units, incorporation of existing insignificant activities at the facility, and description changes to existing emission units. The following is a list of the proposed emission units and pollution control devices:

New Units:

- (a) The addition of emission units to Re-Pack Room 4 (RP4), including the following:
 - (1) One (1) Dump Station (Dump Station 2), one (1) Hopper (Hopper 2), and one (1) Conveyor (Conveyor 2), approved in 2018 for construction, with a maximum throughput of 1,250 lbs food grade material per hour, using a baghouse, identified as BH19, to control particulate emissions, exhausting inside the building. Out of the 1,250 lbs of material, 625 lbs will be liquid and 625 lbs will be dry.

- (b) The addition of emission units to Spray Dryer Line 1, including the following:
 - (1) One (1) Spray Dry Sifter, identified as Spray Dry 1, approved in 2018 for construction with a maximum throughput of 1,790 pounds per hour, using a baghouse identified as BH17 as control, exhausting to stack S2.
- (c) One (1) moveable packaging station, identified as 00173, approved in 2018 for construction, with a maximum throughput capacity of 3,000 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.
- (d) One (1) Coating system, approved in 2018 for construction, consisting of one (1) coating reel, one (1) hopper, and one (1) moveable packaging station, with a maximum throughput capacity of 1,875 lbs of dry food grade materials/hour, equipped with a baghouse, identified as BH6, to control particulate emissions from a docked moveable packaging station docking station, exhausting inside the building.

Existing Units (currently not included in permit):

- (a) One (1) natural gas-fired Water Heater, identified as Water Heater 2, constructed in 2016, with a maximum capacity of 0.35 MMBtu/hour, using no control equipment, and exhausting to the atmosphere.
- (b) One (1) natural gas-fired boiler, identified as Boiler, constructed in 2011, with a maximum capacity of 4.31 MMBtu/hour, using no control equipment, and exhausting to the atmosphere.
- (c) One (1) natural gas-fired air makeup unit, constructed in 2016, with a maximum capacity of 2.49 MMBtu/hour, using no control equipment, and exhausting to the atmosphere.
- (d) One (1) maintenance welding station, identified as MW1 , including the following:
 - (1) One (1) metal inert gas (MIG) welding unit, constructed in 2010, with a maximum capacity of 0.50 pounds of electrode per hour, using no control equipment, and exhausting indoors.
 - (2) One (1) tungsten inert gas (TIG) welding unit, constructed in 2010, with a maximum capacity of 0.50 pounds of electrode per hour, using no control equipment, and exhausting indoors.
 - (3) One (1) stick welding unit, constructed in 2010, with a maximum capacity of 0.50 pounds of electrode per hour, using no control equipment, and exhausting indoors.
- (e) One (1) maintenance drill press, identified as MDP1, constructed in 2010, with a maximum capacity of 12 pounds of metal parts per hour, using no control equipment, and exhausting indoors.
- (f) One (1) maintenance grinding station, identified as MG1, including the following:
 - (1) One (1) maintenance disk grinder, constructed in 2014, with a maximum capacity of 10 pounds of metal parts per hour, using no control equipment, and exhausting indoors.
 - (2) One (1) maintenance bench grinder, constructed in 2010, with a maximum capacity of 12 pounds of metal parts per hour, using no control equipment, and exhausting indoors.
- (g) One (1) maintenance sandblaster, identified as MSB1, constructed in 2017, with a maximum flow rate of 50 pounds per hour, using baghouse for control, and exhausting indoors.

In addition, the Permittee has requested the following changes to the permit:

- (a) The mix tanks identified as Mix Tank 1 and Mix Tank 2 only hold slurry with no associated PM emissions. Therefore, the following description change will be made:

Two (2) mix tanks, identified as Mix Tank 1 and Mix Tank 2, constructed in 2012, **for storing slurry** 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;~~

- (b) Changes to Blend Room 1, the control equipment for Blend Room 2, Small Receiving Bin, Rail/Truck Unloading Operation, and the removal of Bag Dump 1 and Bag Dump 2 from the permit since these are no longer in operation,

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 Significant Permit Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1. 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 ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Combined HAPs
NG Combustion*	0.06	0.23	0.23	0.02	3.07	0.17	2.58	0.06	0.06
Maintenance Welding Stations (MW1)*	0.14	0.14	0.14	0.00	0.00	0.00	0.00	8.23E-03	8.23E-03
Maintenance Drill Press (MDP1)*	0.24	0.24	0.24	0.00	0.00	0.00	0.00	0.00	0.00
Maintenance Grinding (MG1)*	2.13E-04	2.13E-04	2.13E-04	0.00	0.00	0.00	0.00	0.00	0.00
Maintenance Sand Blaster (MSB1)**	8.98	6.29	6.29	0.00	0.00	0.00	0.00	0.00	0.00
Re-Pack Room 4 - Hopper 2	4.38	4.38	4.38	0.00	0.00	0.00	0.00	0.00	0.00
Re-Pack Room 4 - Conveyor/Dock 2	4.38	4.38	4.38	0.00	0.00	0.00	0.00	0.00	0.00
Re-Pack Room 4 - Dump Station 2	4.38	4.38	4.38	0.00	0.00	0.00	0.00	0.00	0.00
Grinding Mill - Small Bin (BH15)	2.10	2.10	2.10	0.00	0.00	0.00	0.00	0.00	0.00

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Combined HAPs
Spray Dry 1 - Sifter	8.62	8.62	8.62	0.00	0.00	0.00	0.00	0.00	0.00
Re-Pack Room 3 - Coating Reel	negl.	negl.	negl.	0.00	0.00	0.00	0.00	0.00	0.00
Re-Pack Room 3 - Dock 2	2.63	2.63	2.63	0.00	0.00	0.00	0.00	0.00	0.00
Total PTE of Revision	35.91	33.39	33.39	0.02	3.07	0.17	2.58	0.07	0.06
¹ Under the Part 70 Permit program (40 CFR 70), PM ₁₀ and PM _{2.5} , not particulate matter (PM), are each considered as a "regulated air pollutant." ² PM _{2.5} listed is direct PM _{2.5} . ³ Single highest source-wide HAP. *existing units (insignificant activities) at the facility, not currently included in permit **CWOP/OWOP units at the facility									

Appendix A of this TSD reflects the potential emissions of the proposed revision in detail.

Pursuant to 326 IAC 2-8-11.1(f)(1)(C), 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 is subject to 326 IAC 8-1-6.

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

- (i) PM, PM₁₀, or direct PM_{2.5}.

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 ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of the FESOP Revision Prior to Revision (tons/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Combined HAPs
Rail/Truck Unload Silo (BV1 & BH20)	1.75	1.75	1.75	0	0	0	0	0	0
Blend Room 1 - Sifter (BH1)	3.15 2.02	3.15 2.02	3.15 2.02	0	0	0	0	0	0
Blend Room 1 - Sifter 2 (BH1)	2.02	2.02	2.02	0	0	0	0	0	0
Blend Room 1 - Dock (BH2)	0.88	0.88	0.88	0	0	0	0	0	0
Blend Room 2 - Sifter (BH3)	3.07 1.97	3.07 1.97	3.07 1.97	0	0	0	0	0	0
Blend Room 2 - Sifter 2 (BH3)	1.97	1.97	1.97	0	0	0	0	0	0

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of the FESOP Revision Prior to Revision (tons/year)								
	PM¹	PM₁₀¹	PM_{2.5}^{1, 2}	SO₂	NO_x	VOC	CO	Single HAP³	Combined HAPs
Blend Room 2 - Dock (BH4)	0.88	0.88	0.88	0	0	0	0	0	0
Re-Pack Room 3 - Sifter (BH5)	6.31	6.31	6.31	0	0	0	0	0	0
Re-Pack Room 3 - Dock (BH6)	1.31	1.31	1.31	0	0	0	0	0	0
Re-Pack Room 2 - Sifter (BH7)	6.31	6.31	6.31	0	0	0	0	0	0
Re-Pack Room 2 - Dock (BH8)	1.31	1.31	1.31	0	0	0	0	0	0
Bulk Loadout - Sifter (BH9)	5.40	5.40	5.40	0	0	0	0	0	0
Bulk Loadout - Dock (BH10)	4.75	4.75	4.75	0	0	0	0	0	0
Rail/Truck Unload Dock (BH10/BH11)	4.75	4.75	4.75	0	0	0	0	0	0
Baler (BH12)	0.93	0.93	0.93	0	0	0	0	0	0
Spray Dry 1 / Cyclone C1 (BH13)	10.51	10.51	10.51	0	0	0	0	0	0
Pilot Spray Dryer (BH14)	0.44	0.44	0.44	0	0	0	0	0	0
Grinding Mill 1 - Small Bin (BH15)	0.44	0.44	0.44	0	0	0	0	0	0
Grinding Mill 1 & Large Receiving Bin (BH16)	0.44	0.44	0.44	0	0	0	0	0	0
See Note BH17 for Units	4.373.91	4.373.91	4.373.91	0	0	0	0	0	0
Grinding Mill 1-Dock, Re-Pack 4 - Convey/Dock Hopper Sifter (BH19)	4.274.92	4.274.92	4.274.92	0	0	0	0	0	0
See Note WS1 for Units	11.64	11.64	11.64	0	0	0	0	0	0
Extruder Line 1 - Extruder/Cyclone & Extruder 1 - Belt Dryer (WS2)	3.42	3.42	3.42	0	0	0	0	0	0
Natural Gas Combustion	0.080.14	0.330.55	0.330.55	0.030.02	4.414.12	0.220.21	3.703.46	0.08	0.080.07
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 (BH11)	5.40	5.40	5.40	0	0	0	0	0	0
Bulk Loadout 2 - Dock (BH18)	4.75	4.75	4.75	0	0	0	0	0	0
Maintenance Welding Stations (MW1)	0.14	0.14	0.14	0	0	0	0	0	0

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of the FESOP Revision Prior to Revision (tons/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Combined HAPs
Maintenance Drill Press (MDP1)	0.24	0.24	0.24	0	0	0	0	0	0
Maintenance Grinding (MG1)	2.13E-04	2.13E-04	2.13E-04	0	0	0	0	0	0
Maintenance Sand Blaster (MSB1)	8.98	6.29	6.29	0	0	0	0	0	0
Total PTE of Entire Source	86.57 97.93	86.82 95.65	86.82 95.65	0.03 0.02	4.41 4.12	0.26 0.24	3.70 3.46	0.11	0.080
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset Major Source Thresholds	100	100	100	100	100	100	100	NA-	NA
¹ Under the Part 70 Permit program (40 CFR 70), PM ₁₀ and PM _{2.5} , not particulate matter (PM), are each considered as a "regulated air pollutant." ² PM _{2.5} listed is direct PM _{2.5} . ³ Single highest source-wide HAP.									

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of the FESOP Revision (tons/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Combined HAPs
Rail/Truck Unload Silo (BV1 & BH20)	1.75	1.75	1.75	0	0	0	0	0	0
Blend Room 1 - Sifter (BH1)	2.02	2.02	2.02	0	0	0	0	0	0
Blend Room 1 - Sifter 2 (BH1)	2.02	2.02	2.02	0	0	0	0	0	0
Blend Room 1 - Dock (BH2)	0.88	0.88	0.88	0	0	0	0	0	0
Blend Room 2 - Sifter (BH3)	1.97	1.97	1.97	0	0	0	0	0	0
Blend Room 2 - Sifter 2 (BH3)	1.97	1.97	1.97	0	0	0	0	0	0
Blend Room 2 - Dock (BH4)	0.88	0.88	0.88	0	0	0	0	0	0
Re-Pack Room 3 - Sifter (BH5)	6.31	6.31	6.31	0	0	0	0	0	0
Re-Pack Room 3 - Dock (BH6)	1.31	1.31	1.31	0	0	0	0	0	0
Re-Pack Room 2 - Sifter (BH7)	6.31	6.31	6.31	0	0	0	0	0	0
Re-Pack Room 2 - Dock (BH8)	1.31	1.31	1.31	0	0	0	0	0	0

[illegible]

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of the FESOP Revision (tons/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Combined HAPs
Emission Offset Major Source Thresholds	100	100	100	100	100	100	100	NA	NA
¹ Under the Part 70 Permit program (40 CFR 70), PM ₁₀ and PM _{2.5} , not particulate matter (PM), are each considered as a "regulated air pollutant." ² PM _{2.5} listed is direct PM _{2.5} . ³ Single highest source-wide HAP.									

Note BH17: Liquid & Powder-Mixer BM2, Spray Dry 1: 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

- (a) **FESOP Status**
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants, and HAPs from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).
- (b) **PSD Minor Source – PM**
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit PM from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) **Emission Offset Minor Source**
This modification to an existing Emission Offset minor stationary source will not change the Emission Offset minor status, because the potential to emit of all nonattainment regulated pollutants from the entire source will continue to be less than the Emission Offset major source threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Federal Rule Applicability Determination

Due to this proposed revision, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

- (a) The requirements of New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Dc) are not included for this proposed revision, because Water Heater 1, and the natural gas-fired boiler each has maximum heat input capacity of less than 10 MMBtu/hr.
- (b) The requirements of New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60, Subpart Kb) are not included for this proposed revision, because Mix Tank 1 and Mix Tank 2 do not have any VOC emissions and do not contain petroleum liquids.
- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources (40 CFR 63, Subpart JJJJJJ, are not included for this proposed revision, because Water Heater 2 and the boiler are natural gas-fired units, and are exempt pursuant to 40 CFR 63.11195.
- (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, or is part of a major source of HAP emissions.
- (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, because 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.

Compliance Assurance Monitoring (CAM):

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

State Rule Applicability Determination

- (a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (PSD)
PSD and Emission Offset applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.
- (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, because 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, LaPorte, or Lawrenceburg Township, Dearborn 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)
Due to this revision, the source is subject to the requirements of 326 IAC 6-4, because 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 (Particulate Matter Limitations except Lake County)
This source is not located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne County, and therefore is not subject to 326 IAC 6.5.
- (i) 326 IAC 6.8 (Particulate Matter: Lake County)
The source is not subject to the requirements of 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.

Natural Gas Fired Units

- (l) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The Natural Gas Units are not a source of indirect heating, as defined in 326 IAC 1-2-19 "Combustion for indirect heating". Therefore, the requirements of 326 IAC 6-2 do not apply.
- (m) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(1), combustion for indirect heating manufacturing processes are exempt from 326 IAC 6-3; therefore, the natural gas fired units are exempt from the requirements of this rule.

Maintenance Welding Station (MW1)

- (n) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(9), welding manufacturing processes, provided that less than six hundred twenty-five (625) pounds of rod or wire is consumed per day, are exempt from 326 IAC

6-3; therefore, the Maintenance Welding Station (MW1) is exempt from the requirements of this rule.

Maintenance Drill Press (MDP1)

- (o) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour are exempt from 326 IAC 6-3; therefore, the Maintenance Drill Press (MDP1) is exempt from the requirements of this rule.

Maintenance Grinding (MG1)

- (p) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour are exempt from 326 IAC 6-3; therefore, Maintenance Grinding (MG1) is exempt from the requirements of this rule.

Maintenance Sand Blaster (MSB1)

- (q) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour are exempt from 326 IAC 6-3; therefore, Maintenance Sand Blaster (MSB1) is exempt from the requirements of this rule.

Re-Pack Room 4

- (r) 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.
- (s) 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 Re-Pack Room 4 dump station, hopper, and conveyor, 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 Re-Pack Room 4 dump station, hopper, and conveyor 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)
Re-Pack Room 4 - Conveyor 2	BH19	0.31	1.9
Re-Pack Room 4 - Dump Station 2		0.31	1.9
Re-Pack Room 4 - Hopper 2		0.31	1.9

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 Re-Pack Room 4 dump station, hopper, and conveyor at all times the Re-Pack Room 4 operation is in operation, in order to comply with this limit.

Spray Dry Sifter

- (t) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the Spray Dry Sifter 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:

Process Step	Control Unit	Process Weight Rate (ton/hr)	Maximum Allowable Emission Rate (lb/hr)
Spray Dryer 1 - Sifter	BH17	0.90	3.8

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:

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

In order to comply with the pound per hour particulate emission rates each baghouse for particulate control shall be in operation and control emissions from the associated processes as indicated in the table above at all times the associated processes are in operation.

Re-Pack Room 3

- (u) 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.
- (v) 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 not applicable to the new equipment (coating system) at Re-Pack Room 3 since each has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Pursuant to 326 IAC 6-3-2(e), the particulate emissions from Re-Pack Room 3 dump station, hopper, and conveyor 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)
Re-Pack Room 3 - Dock 2	BH6	0.94	3.9

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 Re-Pack Room 3 - Dock 2 at all times the Re-Pack Room 3 operation is in operation, in order to comply with this limit.

Compliance Determination and Monitoring Requirements

- (a) The Compliance Monitoring Requirements applicable to this proposed revision are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
BH17	Visible Emissions	Daily	Normal-Abnormal	Response Steps
BH19	Baghouse Inspections	Each calendar quarter	None	Replacement
BH6 (exhausts indoors)	None	None	None	None

These monitoring conditions are necessary because the baghouses BH17 and BH19 for the Re-Spray Dryer Line 1 Sifter and Pack Room 4 Hopper 2, Conveyor/Dock 2, Dump Station 2 must operate properly to assure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes) and in order to make 326 IAC 2-2 (PSD) 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) Condition A.2 - Emission Units and Pollution Control Equipment Summary has been revised to incorporate the new units.
- (2) Condition A.3 - Specifically Regulated Insignificant Activities has been revised to incorporate the new units.
- (3) Condition A.4 - Other Insignificant Activities has been revised to incorporate the new units.
- (4) Section D.1 - Emissions Unit Operation Conditions has been revised to incorporate the new units.
- (5) Condition D.1.1 has been revised to include the description changes

- (7) Condition D.1.2 has been revised to include the 326 IAC 6-3-2 PM limit for the new units and to delete requirements for units that are no longer in operation or have no PM emissions.
- (8) Condition D.1.5(a) has been revised to include the compliance determination requirements for particulate control to assure that the new units comply with the requirements of the FESOP PM limit, and to delete requirements for units no longer in operation or that have no PM emissions.
- (9) Condition D.1.6 (Testing) has been revised to include a testing requirement for wet scrubber WS1.
- (10) Condition D.1.7(a) has been revised to include the description changes and delete monitoring requirements for units that have been removed or which do not have PM emissions.
- (11) Condition D.1.8(a) - Baghouse Inspections has been revised.

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:

- (a) One (1) blend room, identified as Blend Room 1, constructed in 2006 and permitted in 2011, consisting of ~~one (1)~~ **two (2)** sifters, 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 sifters, 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)~~ **two (2)** sifters, 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 sifters, and a baghouse, identified as BH4, 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.~~ **One (1) Re-Pack Room, identified as Re-Pack Room 3 (RP3), including the following:**

- (1) **One (1) sifter and packaging station docking station constructed in 2010 and permitted in 2011, 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.**
- (2) **One (1) Coating system approved in 2018 for construction, consisting of one (1) coating reel, one (1) hopper, and one (1) moveable packaging station, with a maximum throughput capacity of 1,875 lbs of dry food grade materials/hour, equipped with a baghouse, identified as BH6, to control**

particulate emissions from a docked moveable packaging station docking station, exhausting inside the building.

- (g) One (1) Re-Pack Room, identified as Re-Pack Room 4 (RP4), including the following:
- (1) One (1) packaging station docking station, constructed in 2013, with a maximum throughput capacity of 1,500 lbs dry food grade materials per hour, using a baghouse, identified as BH19, exhausting inside the building to control particulate emissions from the small receiving bin, exhausting to stack S5.
 - (2) One (1) Dump Station, one (1) Hopper, and one (1) Conveyor, approved in 2018 for construction, with a maximum throughput of 1,250 lbs food grade material per hour, using a baghouse, identified as BH19, to control particulate emissions, exhausting inside the building. Out of the 1,250 lbs of material, 625 lbs will be liquid and 625 lbs will be dry.
 - (3) **One (1) Dump Station 2, one (1) Hopper 2, and one (1) conveyor (Conveyor 2), approved in 2018 for construction, with a maximum throughput of 1,250 lbs food grade material per hour, using a baghouse, identified as BH19, to control particulate emissions, exhausting inside the building. Out of the 1,250 lbs of material, 625 lbs will be liquid and 625 lbs will be dry.**

- (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 ~~atwo~~ (2) baghouses, identified as BH11 **and BH20**, to control particulate emissions from a docked moveable packaging station, exhausting inside the building.

- (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;~~
 - ~~(21) Two (2) mix tanks, identified as Mix Tank 1 and Mix Tank 2, constructed in 2012, for storing slurry 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;~~
 - ~~(32) 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;~~

- (43) 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;
- (54) 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
- (65) 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.
- (6) One (1) closed sifter, constructed in 2015, with a maximum throughput of 1,790 lb/hr.
- (7) **One (1) Spray Dry Sifter, identified as Spray Dry 1, approved in 2018 for construction with a maximum throughput of 1,790 pounds per hour, 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 ~~2001~~**1,500** 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 **large** receiving bin;

- (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 BH11, to control particulate emissions from the sifter and from a docked moveable packaging station, exhausting outdoors through stack S3.~~**equipped with a baghouse, identified as BH11, exhausting indoors to control particulate emissions from the sifter and BH18, exhausting outdoors through stack S3, to control particulate emissions from a docked moveable packaging station.**

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

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

- (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]~~ **One (1) natural gas-fired Water Heater,**

identified as Water Heater 2, constructed in 2016, with a maximum capacity of 0.35 MMBtu/hour, using no control equipment, and exhausting to the atmosphere.

- (c) One (1) natural gas-fired boiler, identified as Boiler, constructed in 2010, with a maximum capacity of 4.31 MMBtu/hour, using no control equipment, and exhausting to the atmosphere.**
- (d) One (1) natural gas-fired air makeup unit, constructed in 2016, with a maximum capacity of 0.08 MMBtu/hour, using no control equipment, and exhausting to the atmosphere.**

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

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

- (a) ~~Fourteen~~Fifteen (1415) moveable final product packaging stations, as follows:**

- (15) One (1) moveable packaging station, identified as 00173, approved in 2018 for construction, 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.**
- (b) Two (2) maintenance welding stations, identified as MW1, each including the following:**
 - (1) One (1) metal inert gas (MIG) welding unit, constructed in 2010, with a maximum capacity of 0.50 pounds of electrode per hour, using no control equipment, and exhausting indoors.**
 - (2) One (1) tungsten inert gas (TIG) welding unit, constructed in 2010, with a maximum capacity of 0.50 pounds of electrode per hour, using no control equipment, and exhausting indoors.**
 - (3) One (1) stick welding unit, constructed in 2010, with a maximum capacity of 0.50 pounds of electrode per hour, using no control equipment, and exhausting indoors.**
- (c) One (1) maintenance drill press, identified as MDP1, constructed in 2010, with a maximum capacity of 12 pounds of metal parts per hour, using no control equipment, and exhausting indoors.**
- (d) One (1) maintenance grinding station, identified as MG1, including the following:**
 - (1) One (1) maintenance disk grinder, constructed in 2014, with a maximum capacity of 10 pounds of metal parts per hour, using no control equipment, and exhausting indoors.**
 - (2) One (1) maintenance bench grinder, constructed in 2010 with a maximum capacity of 12 pounds of metal parts per hour, using no control equipment, and exhausting indoors.**
- (e) One (1) maintenance sandblaster, identified as MSB1, constructed in 2017, with a maximum flow rate of 50 pounds per hour, using baghouse for control, and exhausting indoors.**

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~~**two (42)** sifters, 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 sifters, 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~~**two (42)** sifters, 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 sifters, and a baghouse, identified as BH4, 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.~~ **One (1) Re-Pack Room, identified as Re-Pack Room 3 (RP3), including the following:**
 - (1) **One sifter and packaging station docking station constructed in 2010 and permitted in 2011, 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.**
 - (2) **One (1) Coating system approved in 2018 for construction, consisting of one (1) coating reel, one (1) hopper, and one (1) moveable packaging station, with a maximum throughput capacity of 1,875 lbs of dry food grade materials/hour, equipped with a baghouse, identified as BH6, to control particulate emissions from a docked moveable packaging station docking station, exhausting inside the building.**
- (g) One (1) Re-Pack Room, identified as Re-Pack Room 4 (RP4), including the following:
 - (1) One (1) packaging station docking station, constructed in 2013, with a maximum throughput capacity of 1,500 lbs dry food grade materials per hour, using a baghouse, identified as BH19, exhausting inside the building to control particulate emissions from the small receiving bin, exhausting to stack S5.
 - (2) One (1) Dump Station, one (1) Hopper, and one (1) Conveyor, approved in 2018 for construction, with a maximum throughput of 1,250 lbs food grade material per hour, using a baghouse, identified as BH19, to control particulate emissions, exhausting inside the building. Out of the 1,250 lbs of material, 625 lbs will be liquid and 625 lbs will

be dry.

- (3) One (1) Dump Station 2, one (1) Hopper 2, and one (1) Conveyor 2, approved in 2018 for construction, with a maximum throughput of 1,250 lbs food grade material per hour, using a baghouse, identified as BH19, to control particulate emissions, exhausting inside the building. Out of the 1,250 lbs of material, 625 lbs will be liquid and 625 lbs will be dry.**

- (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 **atwo (2) baghouses**, identified as BH11 and BH20, to control particulate emissions from a docked moveable packaging station, exhausting inside the building.

- (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;~~

(21) 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;

(32) 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;

(43) 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;

(54) 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

(65) 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.

- (6) One (1) closed sifter, constructed in 2015, with a maximum throughput of 1,790 lb/hr.
- (7) **One (1) Spray Dry Sifter, identified as Spray Dry 1, approved in 2018 for construction with a maximum throughput of 1,790 pounds per hour, 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 ~~2001~~**1,500** 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 **large** receiving bin;
- (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 BH11, to control particulate emissions from the sifter and from a docked moveable packaging station, exhausting outdoors through stack S3.~~**equipped with a baghouse, identified as BH11, exhausting indoors to control particulate emissions from the sifter and BH18, exhausting outdoors through stack S3, to control particulate emissions from a docked moveable packaging station.**

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]~~ **One (1) natural gas-fired Water Heater, identified as Water Heater 2, constructed in 2016, with a maximum capacity of 0.35 MMBtu/hour, using no control equipment, and exhausting to the atmosphere.**
- (c) **One (1) natural gas-fired boiler, identified as Boiler, constructed in 2010, with a maximum capacity of 4.31 MMBtu/hour, using no control equipment, and exhausting to the atmosphere.**
- (d) **One (1) natural gas-fired air makeup unit, constructed in 2016, with a maximum capacity of 2.49 MMBtu/hour, using no control equipment, and exhausting to the atmosphere.**
- (e) **One (1) maintenance sandblaster, identified as MSB1, constructed in 2017, with a maximum flow rate of 50 pounds per hour, using baghouse for control, and exhausting indoors.**

(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]

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:

Process/Unit	Control ID	Stack ID	PM limit (lb/hr)	PM10 limit* (lb/hr)	PM2.5 limit* (lb/hr)
Blend Room 1 sifters	BH1	indoors	0.2	0.2	0.2
Blend Room 1 docking station	BH2	indoors	0.1	0.1	0.1
Blend Room 2 sifters	BH3	indoors	0.2	0.2	0.2
Blend Room 2 docking station,	BH4	indoors	0.1	0.1	0.1
Re-Pack Room 3 sifter	BH5	indoors	0.4	0.4	0.4
Re-Pack Room 3 docking station, coating system	BH6	indoors	0.1	0.1	0.1
Re-Pack Room 2 sifter	BH7	indoors	0.4	0.4	0.4
Re-Pack Room 2 docking station	BH8	indoors	0.1	0.1	0.1
Bulk Loadout sifter	BH9	indoors	0.4	0.4	0.4
Bulk Loadout docking station	BH10	indoors	0.3	0.3	0.3
Rail/Truck Unloading - packaging station docking station, Bulk Loadout 2 (BLO2) sifter and packaging station docking station	BH11 and BH20	S3	0.7	0.7	0.7

Bailer,	BH12	indoors	0.1	0.1	0.1
Spray dryer, identified as Spray Dryer 1	BH13	S1	2.4	2.4	2.4
Pilot Spray Dryer	BH14	S6	0.1	0.1	0.1
Small Receiving Bin in the Grinding Mill 1 line	BH15	S5	0.1	0.1	0.1
Grinding Mill 1 and Large Receiving Bin	BH16	S4	0.1	0.1	0.1
Liquid & Powder Blending Operation, the Spray Dryer Line 1 packaging station, Breddo Mixer (BM1), and the Powdered Product Conveyor (CV1)	BH17	S2	0.3	0.3	0.3
Bulk Loadout 2 (BLO2) docked moveable packaging station.	BH18	S3	0.3	0.3	0.3
Grinding Mill 1 docking station and the Re-Pack Room 4 packaging station docking station, Hoppers, Dump Stations, and Conveyors,	BH19	indoors	0.8	0.8	0.8
Blend Room 4, Extrusion Line 1 Sifters 1 and	WS1	S7	0.8	0.8	0.8

2, Mixer 3, Surge Hopper 1A, Loss in Weight Feeder F1, Open vibratory conveyor and one (1) enclosed bucket conveyor, Surge Hopper 1B, and Docking Station 070					
Extruder 1 and Belt Dryer BD1	WS2	S8	0.7	0.7	0.7
Rail/Truck Unloading Silo	Bin vent filter BV1	indoors	0.4	0.4	0.4

***PM10 and PM2.5 include both filterable and condensible PM.**

- ~~(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 condensible 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 condensible 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 condensible PM.~~
- ~~(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.~~
- (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 BH18, 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, Dump Station 1, and Conveyor 1 filling a docked moveable packaging station, exhausting indoors, shall not exceed 0.8 lb/hr, where PM10 and PM2.5 include both filterable and condensable PM.~~
- (v) ~~PM, PM10, and PM2.5 emissions from BH11, 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.~~

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)
...
Rail/Truck Unloading Docking Station	BH11	5.00	12.1
Rail/Truck Unloading Silo	BV1 & BH20	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 3 - Dock 2	BH6	0.94	3.9
Re-Pack Room 4 - Docking Station/Conveyor 1	BH19	0.31	1.9
Re-Pack Room 4 - Hopper 1	BH19	0.31	1.9
Re-Pack Room 4 - Dump Station 1	BH19	0.31	1.9
Re-Pack Room 4 - Docking Station/Conveyor 2	BH19	0.31	1.9
Re-Pack Room 4 - Hopper 2	BH19	0.31	1.9
Re-Pack Room 4 - Dump Station 2	BH19	0.31	1.9
Spray Dryer Line 1 - Bag Dump 2	BH17	4.25	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
Spray Dryer Line 1 - Sifter	BH17	0.90	3.8
Maintenance Sand Blaster (MSB1)	Baghouse	0.03	0.551

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~~ **0.35** MMBtu/hr natural gas-fired water heater shall be limited to 0.6 pounds per MMBtu heat input.

D.1.5 Particulate Control

- (a) In order to comply with Condition D.1.1, **the baghouse, wet scrubber, or bin vent filter** ~~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 Docking Station 070	WS1
Extrusion Line 1 - Extruder EX1/Cyclone and Belt Dryer BD1	WS2
Rail/Truck Unloading Silo	BV1 & BH20
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 3 Dock 2	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
Bulk Loadout 2 - Sifter and Docking Station	BH11
Baler	BH12
Bulk Loadout 2 - Docking Station	BH18

Processes	Control Unit
Grinding Mill 1 Docking Station, and Re-Pack Room 4 Conveyor 1, Docking Station, Hopper 1, Dump Station 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	BH4
Blend Room 2 - Sifter	BH3
Bulk Loadout - Docking Station	BH10
Bulk Loadout - Sifter	BH9
Bulk Loadout 2 - Sifter and Docking Station	BH11
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
Bulk Loadout 2 (BLO2) docked moveable packaging station	BH18
Re-Pack Room 4 - Docking Station and Conveyor 1	BH19
Re-Pack 4 - Dump Station 1	BH19
Re-Pack Room 4 - Hopper 1	BH19
Spray Dry Line 1 - Collector Cyclone	BH13
Rail/Truck Unloading Silo	BH20
Maintenance Sand Blaster (MSB1)	Baghouse

D.1.6 Testing

- (a) ...
- (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 scrubbers **WS1 and 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.

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, Sifter 1	BH17 / S2
Bulk Loadout 2 - Sifter and Docking Station	BH11 18 / 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

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 & BH20
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 3 - Dock 2	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 1, Docking Station, Hopper 1, Dump Station 1, Hopper 2, Conveyor/Dock 2, Dump Station 2	BH19

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 BH11~~, 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 **dates**, results, **and corrective actions taken** for each of the inspections required under Condition D.1.8.

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 August 13, 2018.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 109-40318-00062. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Mehul Sura, 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) 233-6868 or (800) 451-6027, and ask for Mehul Sura.
- (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 Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.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

TSD Appendix A - Page 1 of 18

Company Name: PacMoore Process Technologies
Address: 100 PacMoore Parkway, Mooresville, Indiana 46158
Significant Permit Revision No.: 109-40318-00062
Reviewer: Brendan Smith

Uncontrolled Potential to Emit of the Entire Source After Issuance (TPY)									
Emission Unit (Control Device)	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	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)	22.79	22.79	22.79	0.00	0.00	0.00	0.00	0	0
Blend Room 1 - Sifter 2 (BH1)	22.79	22.79	22.79	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)	21.90	21.90	21.90	0.00	0.00	0.00	0.00	0	0
Blend Room 2 - Sifter 2 (BH3)	21.90	21.90	21.90	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 3 - Dock 2 (BH6)	2.63	2.63	2.63	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)	2.10	2.10	2.10	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	51.99	51.99	51.99	0.00	0.00	0.00	0.00	0	0
Grinding Mill 1-Dock, Re-Pack 4 - Convey/Dock Hopper (BH19)	28.38	28.38	28.38	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	0.14	0.55	0.55	0.04	7.19	0.38	6.04	0.14	0.07
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 (BH11)	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
Maintenance Welding Stations (MW1)	0.14	0.14	0.14	0.00	0.00	0.00	0.00	8.32E-03	8.32E-03
Maintenance Drill Press (MDP1)	0.24	0.24	0.24	0.00	0.00	0.00	0.00	0	0
Maintenance Grinding (MG1)	2.13E-04	2.13E-04	2.13E-04	0.00	0.00	0.00	0.00	3.41E-06	3.07E-06
Maintenance Sand Blaster (MSB1)	8.98	6.29	6.29	0.00	0.00	0.00	0.00	0	0
Total PTE of Entire Source	1,383	1,381	1,381	0.04	7.19	0.41	6.04	0.16	0.08
Title V Major Source Thresholds	NA	100	100	100.00	100.00	100.00	100.00	25.00	10.00

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

TSD Appendix A - Page 2 of 18

(continued from previous page)

Controlled Potential to Emit of the Entire Source After Issuance (TPY)									
Emission Unit (Control Device)	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	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)	1.57	1.57	1.57	0.00	0.00	0.00	0.00	0	0
Blend Room 1 - Sifter 2 (BH1)	1.57	1.57	1.57	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)	1.51	1.51	1.51	0.00	0.00	0.00	0.00	0	0
Blend Room 2 - Sifter 2 (BH3)	1.51	1.51	1.51	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)	0.04	0.04	0.04	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	3.59	3.59	3.59	0.00	0.00	0.00	0.00	0	0
Grinding Mill 1-Dock, Re-Pack 4 - Convey/Dock Hopper (BH19)	1.05	1.05	1.05	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	0.14	0.55	0.55	0.04	7.19	0.38	6.04	0.14	0.07
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 (BH11)	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
Maintenance Welding Stations (MW1)	0.14	0.14	0.14	0.00	0.00	0.00	0.00	0.01	0.01
Maintenance Drill Press (MDP1)	0.24	0.24	0.24	0.00	0.00	0.00	0.00	0.00	0
Maintenance Grinding (MG1)	2.13E-04	2.13E-04	2.13E-04	0.00	0.00	0.00	0.00	3.41E-06	3.07E-06
Maintenance Sand Blaster (MSB1)	0.09	0.06	0.06	0.00	0.00	0.00	0.00	0.00	0
Total PTE of Entire Source	78.43	78.84	78.84	0.04	7.19	0.41	6.04	0.16	0.07
Title V Major Source Thresholds	NA	100.00	100.00	100.00	100.00	100.00	100.00	25.00	10.00
PSD Major Source Thresholds	250.00	250.00	250.00	250.00	250.00	250.00	250.00	NA	NA

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

TSD Appendix A - Page 3 of 18

(continued from previous page)

Limited Potential to Emit of the Entire Source After Issuance (TPY)									
Emission Unit (Control Device)	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	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)	2.02	2.02	2.02	0.00	0.00	0.00	0.00	0	0
Blend Room 1 - Sifter 2 (BH1)	2.02	2.02	2.02	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)	1.97	1.97	1.97	0.00	0.00	0.00	0.00	0	0
Blend Room 2 - Sifter 2 (BH3)	1.97	1.97	1.97	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	3.91	3.91	3.91	0.00	0.00	0.00	0.00	0	0
Grinding Mill 1-Dock, Re-Pack 4 - Convey/Dock Hopper (BH19)	4.92	4.92	4.92	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	0.14	0.55	0.55	0.02	4.12	0.21	3.46	0.08	0.07
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 (BH11)	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
Maintenance Welding Stations (MW1)	0.14	0.14	0.14	0.00	0.00	0.00	0.00	0.01	0.01
Maintenance Drill Press (MDP1)	0.24	0.24	0.24	0.00	0.00	0.00	0.00	0.00	0.00
Maintenance Grinding (MG1)	2.13E-04	2.13E-04	2.13E-04	0.00	0.00	0.00	0.00	3.41E-06	3.07E-06
Maintenance Sand Blaster (MSB1)	8.98	6.29	6.29	0.00	0.00	0.00	0.00	0.00	0.00
Total PTE of Entire Source	97.93	95.65	95.65	0.02	4.12	0.24	3.46	0.11	0.08
Title V Major Source Thresholds	NA	100.00	100.00	100.00	100.00	100.00	100.00	25.00	10.00
PSD Major Source Thresholds	250.00	250.00	250.00	250.00	250.00	250.00	250.00	NA	NA

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)
Summary of the Modification**

Company Name: PacMoore Process Technologies
Address: 100 PacMoore Parkway, Mooresville, Indiana 46158
Significant Permit Revision No.: 109-40318-00062
Reviewer: Brendan Smith

Uncontrolled/Unlimited PTE of the Modification (tons/year)									
Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Combined HAP	Highest Single HAP
NG Combustion	0.06	0.23	0.23	0.02	3.07	0.17	2.58	0.06	0.06
Maintenance Welding Stations (MW1)	0.14	0.14	0.14	0.00	0.00	0.00	0.00	8.32E-03	8.32E-03
Maintenance Drill Press (MDP1)	0.24	0.24	0.24	0.00	0.00	0.00	0.00	0.00	0.00
Maintenance Grinding (MG1)	2.13E-04	2.13E-04	2.13E-04	0.00	0.00	0.00	0.00	3.41E-06	3.07E-06
Maintenance Sand Blaster (MSB1)	8.98	6.29	6.29	0.00	0.00	0.00	0.00	0.00	0.00
Re-Pack Room 4 - Hopper 2	4.38	4.38	4.38	0.00	0.00	0.00	0.00	0.00	0.00
Re-Pack Room 4 - Conveyor/Dock 2	4.38	4.38	4.38	0.00	0.00	0.00	0.00	0.00	0.00
Re-Pack Room 4 - Dump Station 2	4.38	4.38	4.38	0.00	0.00	0.00	0.00	0.00	0.00
Grinding Mill - Small Bin (BH15)	2.10	2.10	2.10	0.00	0.00	0.00	0.00	0.00	0.00
Spray Dry 1 - Sifter	8.62	8.62	8.62	0.00	0.00	0.00	0.00	0.00	0.00
Re-Pack Room 3 - Coating Reel	negl.	negl.	negl.	0.00	0.00	0.00	0.00	0.00	0.00
Re-Pack Room 3 - Dock 2	2.63	2.63	2.63	0.00	0.00	0.00	0.00	0.00	0.00
Total Uncontrolled/Unlimited PTE of the Modification	35.91	33.39	33.39	0.02	3.07	0.17	2.58	0.07	0.06

**Appendix A to the Technical Support Document (TSD)
Maintenance Welding Station (MW1)**

TSD Appendix A - Page 5 of 18

Company Name: PacMoore Process Technologies
Address: 100 PacMoore Parkway, Mooresville, Indiana 46158
Significant Permit Revision No.: 109-40318-00062
Reviewer: Brendan Smith

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
WELDING			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Metal Inert Gas (MIG)(carbon steel)	2	0.50	0.0055	0.0005	0.000	0.000	0.006	0.001	0.000	0.000	0.001
Tungsten Inert Gas (TIG)(carbon steel)	2	0.50	0.0055	0.0005	0.000	0.000	0.006	0.001	0.000	0.000	0.001
Stick (E7018 electrode)	2	0.50	0.0211	0.0009	0.000	0.000	0.021	0.001	0.000	0.000	0.001
EMISSION TOTALS											
Potential Emissions lbs/hr							3.21E-02	1.90E-03	0.00E+00	0.00E+00	1.90E-03
Potential Emissions lbs/day							0.77	0.05	0.00	0.00	0.05
Potential Emissions tons/year							0.14	8.32E-03	0.00E+00	0.00E+00	8.32E-03

Methodology:

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

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

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

Emissions, tons/yr = emissions, lb/hr x 8760 hrs/year x 1 ton/2,000 lbs.

Appendix A to the Technical Support Document (TSD)
Maintenance Drill Press (MDP1)

TSD Appendix A - Page 6 of 18

Company Name: PacMoore Process Technologies

Address: 100 PacMoore Parkway, Mooresville, Indiana 46158

Significant Permit Revision No.: 109-40318-00062

Reviewer: Brendan Smith

	Number of Parts (parts/hr)	Throughpu t (lbs/hr)	Emission Factor (lb PM/lb)	PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)
Drill Press	12	12.00	0.0045	0.23652	0.23652	0.23652

Methodology:

*Emission factors are from FIRE Volume II, Chapter 14, Grey Stone Iron Foundries - SCC 3-04-003-60 (July, 2001)
Drill Press Emissions (tons/year) = lb/hr*emission factor (0.0045)*8760 hrs/year*1 ton/2000 lbs

**Appendix A to the Technical Support Document (TSD)
Maintenance Sand Blaster (SB1)**

Company Name: PacMoore Process Technologies

Address: 100 PacMoore Parkway, Mooresville, Indiana 46158

Significant Permit Revision No.: 109-40318-00062

Reviewer: Brendan Smith

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor (EF)	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Potential to Emit Before Control

FR = Flow rate of actual abrasive (lb/hr) = 50.0000 lb/hr (per nozzle)

w = fraction of time of wet blasting = 0 %

N = number of nozzles = 1

EF = PM emission factor for actual abrasive from Table 1 = 0.041 lb PM/ lb abrasive

PM10 emission factor ratio for actual abrasive from Table 1 = 0.70 lb PM10 / lb PM

	PM	PM10	PM2.5	
Potential to Emit (before control) =	2.1E+00	1.4E+00	1.4E+00	lb/hr
=	4.9E+01	3.4E+01	3.4E+01	lb/day
=	9.0E+00	6.3E+00	6.3E+00	ton/yr

Potential to Emit After Control

	PM	PM10	PM2.5	
Emission Control Device Efficiency =	99.0%	99.0%	99.9%	
Potential to Emit (after control) =	2.1E-02	1.4E-02	1.4E-02	lb/hr
=	4.9E-01	3.4E-01	3.4E-01	lb/day
=	9.0E-02	6.3E-02	6.3E-02	ton/yr

METHODOLOGY

PM2.5 emissions assumed equal to PM10 emissions.

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

Potential to Emit (before control) = $EF \times FR \times (1 - w/200) \times N$ (where w should be entered in as a whole number (if w is 50%, enter 50))

Potential to Emit (after control) = [Potential to Emit (before control)] * [1 - control efficiency]

Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]

**Appendix A to the Technical Support Document (TSD)
Maintenance Grinding Station (MG1)**

TSD Appendix A - Page 8 of 18

Company Name: PacMoore Process Technologies
Address: 100 PacMoore Parkway, Mooresville, Indiana 46158
Significant Permit Revision No.: 109-40318-00062
Reviewer: Brendan Smith

Unit ID		Maximum Capacity (lbs/hr)	PM Emission Factor* (lbs/ton)	PM10/PM2.5 Emission Factor* (lbs/ton)	PM Emission Rate (lbs/hr)	PM10/PM2.5 Emission Rate (lbs/hr)	PM Emission Rate (tons/yr)	PM10/PM2.5 Emission Rate (tons/yr)
Machine Shop								
Disk Grinder	1	10	0.0045	0.0045	2.16E-05	2.16E-05	9.46E-05	9.46E-05
Bench Grinder	1	12	0.0045	0.0045	2.70E-05	2.70E-05	1.18E-04	1.18E-04
					4.86E-05	4.86E-05	2.13E-04	2.13E-04

Hazardous Air Pollutants (HAPs)

Unit	HAPs (% of PM)**	(% of HAPs)**	(% of HAPs)**	Total HAPs (tons/yr)	Lead (tons/yr)	Manganese (tons/yr)
Machine Shop						
Disk Grinder	1.60%	10.00%	90.00%	1.51E-06	1.51E-07	1.36E-06
Bench Grinder	1.60%	10.00%	90.00%	1.89E-06	1.89E-07	1.70E-06
				3.41E-06	3.41E-07	3.07E-06

* Emission factors are from FIRE Volume II, Chapter 14, Grey Stone Iron Foundries - SCC 3-04-003-60 (July, 2001)

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

Methodology:

Process Rate of castings (tons/hr) = maximum cycle time * maximum capacity each grinder * number of grinders, and was provided by source.

PM emission factor from FIRE Version 6.25 SCC 3-04-003-40 (Shotblast/Grinding).

PM10 and PM2.5 assumed to be equal to PM, since no emission factors for PM10 or PM2.5 are available.

Uncontrolled PM emissions (lb/hr) = process rate (lbs/hr) x emission factor PM (lb/ton) / (2000 lbs/ton)

Uncontrolled PM emissions (ton/yr) = uncontrolled PM emissions (lb/hr) x 8760 hrs/yr / 2000 lb/ton

Uncontrolled PM10 emissions (lb/hr) = process rate (lbs/hr) x emission factor PM10 (lb/ton) / (2000 lbs/ton)

Uncontrolled PM10 emissions (ton/yr) = uncontrolled PM10 emissions (lb/hr) x 8760 hrs/yr / 2000 lb/ton

Uncontrolled PM2.5 emissions (lb/hr) = process rate (lbs/hr) x emission factor PM2.5 (lb/ton) / (2000 lbs/ton)

Uncontrolled PM2.5 emissions (ton/yr) = uncontrolled PM2.5 emissions (lb/hr) x 8760 hrs/yr / 2000 lb/ton

**Appendix A 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.: 109-40318-00062
Reviewer: Brendan Smith

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

10.07

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	3.91	Assumed same as Extrusion Mixer
Spray Dry 1 - Mix Tank 1			1,000	lb/hr	0.00	lb/ton	0.00	95%	0.00	0.00	98%	0.00	0.00			Assumed same as Extrusion Mixer
Spray Dry 1 - Mix Tank 2			1,000	lb/hr	0.00	lb/ton	0.00	95%	0.00	0.00	98%	0.00	0.00			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
Spray Dry 1 - Sifter			1,790	lb/hr	2.20	lb/ton	8.62	95%	8.19	0.43	98%	0.16	0.60			
Summary							51.99		49.39	2.60		0.99	3.59			

(continued on next page)

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	BH11	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	BH18		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	1,500 lb/hr	0.64 lb/ton	2.10	100%	2.10	0.00	98%	0.04	0.04	0.1	0.44	Assumed the same as Extrusion Surge Hopper
Summary					2.10		2.10	0.00		0.04	0.04			

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			

(continued on next page)

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.: 109-40318-00062
Reviewer: Brendan Smith

PM, PM10 and Direct PM2.5 Emissions														
Emission Unit	Control	Throughput	Emission Factor		Uncontrolled/U nlimited 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 & BH20	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 1	BH1	3,125 lb/hr	3.33	lb/ton	22.79	95%	21.65	1.14	98%	0.43	1.57	0.2	2.02	Assumed the same as Extrusion 1 Mixer
Blend Room 1 - Sifter 2	BH1	3,125 lb/hr	3.33	lb/ton	22.79	95%	21.65	1.14	98%	0.43	1.57	0.2	2.02	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	3,125 lb/hr	3.20	lb/ton	21.90	95%	20.81	1.10	98%	0.42	1.51	0.2	1.97	Assumed the same as Blend Room 4
Blend Room 2 - Sifter 2	BH3	3,125 lb/hr	3.20	lb/ton	21.90	95%	20.81	1.10	98%	0.42	1.51	0.2	1.97	Assumed the same as Blend Room 5
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 1	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 3 - Dock 2	BH6	1,875 lb/hr	0.64	lb/ton	2.63	95%	2.50	0.13	98%	0.05	0.18	0.1	0.57	
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	4.92	Assumed same as other docks
Re-Pack Room 4 - Hopper 1		625 lb/hr	3.2	lb/ton	4.38	95%	4.16	0.22	98%	0.08	0.30			Assumed the same as Blend Room 4
Re-Pack Room 4 - Conveyor/Dock 1		625 lb/hr	3.2	lb/ton	4.38	95%	4.16	0.22	98%	0.08	0.30			Assumed the same as Blend Room 4
Re-Pack Room 4 - Dump Station 1		625 lb/hr	3.2	lb/ton	4.38	95%	4.16	0.22	98%	0.08	0.30			
Re-Pack Room 4 - Hopper 2		625 lb/hr	3.2	lb/ton	4.38	95%	4.16	0.22	98%	0.08	0.30			
Re-Pack Room 4 - Conveyor/Dock 2		625 lb/hr	3.2	lb/ton	4.38	95%	4.16	0.22	98%	0.08	0.30			
Re-Pack Room 4 - Dump Station 2		625 lb/hr	3.2	lb/ton	4.38	95%	4.16	0.22	98%	0.08	0.30			
Summary					644.35		615.57	28.78		12.31	41.09	4.40	48.1	

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.: 109-40318-00062

Reviewer: Brendan Smith

Heat Input Capacity			
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	82.45 MMCF/yr	Potential Throughput
Boiler 1	0.20 MMBtu/hr	84,096.00 MMBtu/yr	Potential Throughput
Total Heat Input Capacity	9.60 MMBtu/hr		

Pollutant	Throughput		Emission Factor		PTE (TPY)	Source
PM	82.45	MMCF/yr	1.9	lb/MMCF	0.08	Applicant Request, > AP-42
PM10	82.45	MMCF/yr	7.6	lb/MMCF	0.31	AP-42, Ch. 1.4, Table 1.4-2, 7/98
Direct PM2.5	82.45	MMCF/yr	7.6	lb/MMCF	0.31	AP-42, Ch. 1.4, Table 1.4-2, 7/98
SO2	82.45	MMCF/yr	0.6	lb/MMCF	0.02	AP-42, Ch. 1.4, Table 1.4-2, 7/98
NOx	82.45	MMCF/yr	100	lb/MMCF	4.12	AP-42, Ch. 1.4, Table 1.4-1, 7/98
VOC	82.45	MMCF/yr	5	lb/MMCF	0.21	AP-42, Ch. 1.4, Table 1.4-2, 7/98
CO	82.45	MMCF/yr	84	lb/MMCF	3.46	AP-42, Ch. 1.4, Table 1.4-1, 7/98

Pollutant	Throughput		Emission Factor		PTE (TPY)	Source
Benzene	82.45	MMCF/yr	2.10E-03	lb/MMCF	8.66E-05	AP-42, Ch. 1.4, Table 1.4-3, 7/98
Dichlorobenzene	82.45	MMCF/yr	1.20E-03	lb/MMCF	4.95E-05	AP-42, Ch. 1.4, Table 1.4-3, 7/98
Formaldehyde	82.45	MMCF/yr	7.50E-02	lb/MMCF	3.09E-03	AP-42, Ch. 1.4, Table 1.4-3, 7/98
Hexane	82.45	MMCF/yr	1.80	lb/MMCF	0.07	AP-42, Ch. 1.4, Table 1.4-3, 7/98
Toluene	82.45	MMCF/yr	3.40E-03	lb/MMCF	1.40E-04	AP-42, Ch. 1.4, Table 1.4-3, 7/98
Cadmium	82.45	MMCF/yr	5.00E-04	lb/MMCF	2.06E-05	AP-42, Ch. 1.4, Table 1.4-4, 7/98
Chromium	82.45	MMCF/yr	1.40E-03	lb/MMCF	5.77E-05	AP-42, Ch. 1.4, Table 1.4-4, 7/98
Lead	82.45	MMCF/yr	5.00E-04	lb/MMCF	2.06E-05	AP-42, Ch. 1.4, Table 1.4-4, 7/98
Manganese	82.45	MMCF/yr	3.80E-04	lb/MMCF	1.57E-05	AP-42, Ch. 1.4, Table 1.4-4, 7/98
Nickel	82.45	MMCF/yr	2.10E-03	lb/MMCF	8.66E-05	AP-42, Ch. 1.4, Table 1.4-4, 7/98

Combined HAP (TPY) = 0.08

Single HAP - Hexane (TPY) = 0.07

Methodology:

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

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Natural Gas Units - SSM 40318****Company Name:** PacMoore Process Technologies**Source Address:** 100 PacMoore Parkway, Mooresville, Indiana 46158**Permit Number:** 109-40295-00062**Reviewer:** Brendan Smith

Water Heater 0.35 MMBtu/hr

Large Boiler 4.31 MMBtu/hr

Rupp Make-Up Air 2.49 MMBtu/hr

Total 7.15 MMBtu/hr

Heat Input Capacity	HHV	Potential Throughput
MMBtu/hr	mmBtu	MMCF/yr
	mmscf	
7.2	1020	61.4

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.06	0.23	0.23	0.02	3.07	0.17	2.58

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	6.4E-05	3.7E-05	2.3E-03	0.06	1.0E-04	0.06

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.5E-05	3.4E-05	4.3E-05	1.2E-05	6.4E-05	1.7E-04
					Total HAPs	0.06
					Worst HAP	0.06

Methodology is the same as above.

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

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

Appendix A 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.: 109-40318-00062
Reviewer: Brendan Smith

Emission Unit	Control Device ID	Process Weight Rate (ton/hr)	Process Weight Rate (lb/hr)	PM Emission Limitation (lb/hr)	Uncontrolled PM PTE (lb/hr)	PM Control Required
Baler	BH12	6.25	12,500	14.0	2.25	NO
Blend Room 1 - Docking Station	BH2	3.13	6,260	8.8	2.00	NO
Blend Room 1 - Mixer (no vents)	no vents	no vents		no vents	no vents	no vents
Blend Room 1 - Sifter	BH1	3.13	6,260	8.8	5.20	NO
Blend Room 2 - Docking Station	BH4	3.13	6,260	8.8	2.00	NO
Blend Room 2 - Mixer (no vents)	no vents	no vents		no vents	no vents	no vents
Blend Room 2 - Sifter	BH3	3.13	6,260	8.8	5.00	NO
Blend Room 4 - Docking Station 1	WS1	1.56	3,120	5.5	1.00	NO
Blend Room 4 - Docking Station 2		1.56	3,120	5.5	1.00	NO
Blend Room 4 - Surge Hopper 2		1.56	3,120	5.5	1.00	NO
Blend Room 4 - Surge Hopper 3		1.56	3,120	5.5	1.00	NO
Blend Room 4 - Blender BR4		3.13	6,260	8.8	6.88	NO
Blend Room 4 - Sifter 1		1.56	3,120	5.5	5.00	NO
Blend Room 4 - Sifter 2		1.56	3,120	5.5	5.00	NO
Bulk Loadout - Docking Station	BH10	5.00	10,000	12.1	15.70	Yes
Bulk Loadout - Sifter	BH9	5.00	10,000	12.1	16.65	Yes
Bulk Loadout 2 - Docking Station	BH18	5.00	10,000	12.1	15.70	Yes
Bulk Loadout 2 - Sifter	BH11	5.00	10,000	12.1	16.65	Yes
Extruder Line 1 - Belt Dryer BD1	WS2	1.50	3,000	5.4	0.00	NO
Extruder Line 1 - Bucket Elevator	WS1	1.50	3,000	5.4	3.30	NO
Extruder Line 1 - Open Conveyor		1.50	3,000	5.4	3.30	NO
Extruder Line 1 - Docking Station		1.50	3,000	5.4	1.02	NO
Extruder Line 1 - Extruder EX1/Cyclone 070	WS2	1.50	3,000	5.4	30.00	Yes
Extruder Line 1 - Loss in Weight Feeder F1	WS1	1.50	3,000	5.4	1.02	NO
Extruder Line 1 - Surge Hopper 1A		1.50	3,000	5.4	1.02	NO
Extruder Line 1 - Surge Hopper 1B		1.50	3,000	5.4	1.02	NO
Extruder Line 1 - Mixer 3		1.50	3,000	5.4	4.95	NO
Extruder Line 1 - Sifter 1		1.50	3,000	5.4	4.95	NO
Extruder Line 1 - Sifter 2		1.50	3,000	5.4	5.00	NO
Grinding Mill 1 - Docking Station	BH19	0.75	1,500	3.4	0.48	NO
Grinding Mill 1 - Large Bin	BH16	0.75	1,500	3.4	0.48	NO
Grinding Mill 1 - Mill		0.75	1,500	3.4	2.36	NO
Grinding Mill 1 - Small Bin	BH15	0.10	200	0.9	0.48	NO
Liquid & Powder - Mixer BM2	BH17	1.56	3,120	5.5	4.01	NO
Pilot Spray Dryer/Cyclone C0	BH14	0.03	60	0.551	0.46	NO
Maintenance Sand Blaster (MSB1)	Baghouse (no vents)	0.03	50	0.551	2.05	Yes
Rail/Truck Unloading Docking Station	BH11	5.00	10,000	12.1	15.70	Yes
Rail/Truck Unloading Silo	BV1 & BH20	5.00	10,000	12.1	15.70	Yes
Re-Pack Room 2 - Docking Station	BH8	6.25	12,500	14.0	4.00	NO
Re-Pack Room 2 - Sifter	BH7	6.25	12,500	14.0	20.81	Yes
Re-Pack Room 3 - Docking Station	BH6	6.25	12,500	14.0	4.00	NO
Re-Pack Room 3 - Sifter	BH5	6.25	12,500	14.0	20.81	Yes
Re-Pack Room 3 - Dock 2	BH6	0.94	1,875	3.9	0.60	NO
Re-Pack Room 4 - Docking Station	BH19	0.31	625	1.9	4.38	Yes
Re-Pack Room 4 - Dump Station		0.31	625	1.9	4.38	Yes
Re-Pack Room 4 - Hopper		0.31	625	1.9	4.38	Yes
Re-Pack Room 4 - Hopper 2		0.31	625	1.9	4.38	Yes
Re-Pack Room 4 - Conveyor/Dock 2		0.31	625	1.9	4.38	Yes
Re-Pack Room 4 - Dump Station 2		0.31	625	1.9	4.38	Yes
Spray Dry 1 - Breddo Mixer BM1	BH17	2.50	5,000	7.6	3.33	NO
Spray Dry 1 - Conveyor		0.93	1,860	3.9	1.97	NO
Spray Dry 1 - Docking Station		0.93	1,860	3.9	0.60	NO
Spray Dry 1 - Mix Tank 1		1.25	2,500	4.8	0.00	NO
Spray Dry 1 - Sifter		0.90	1,790	3.8	1.97	NO
Spray Dry 1 - Mix Tank 2		1.25	2,500	4.8	0.00	NO
Spray Dry 1 / Cyclone C1	BH13	2.50	5,000	7.6	40.00	Yes

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
Significant Permit Revision No.: 109-40318-00062
Reviewer: Brendan Smith

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
Significant Permit Revision No.: 109-40318-00062
Reviewer: Brendan Smith

Organic HAP								
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		
Total Potential Emissions			123-31-9	112-27-6 (glycol ether)	143-22-6 (glycol ether)	4.42E-05	0.01	0.01

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

Metal HAP							
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
Significant Permit Revision No.: 109-40318-00062
Reviewer: Brendan Smith

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
Totals			1,880.0		7,806.0			82.5	30,099.2

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

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	4.2	4.2	4.2	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ³ = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

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

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

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.372	0.074	0.0182	lb/mile
Mitigated Emission Factor, Eext =	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
Totals	5.59	1.12	0.27	5.11	1.02	0.25

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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

November 27, 2018

Joe Williams
PacMoore Process Technologies
100 PacMoore Pkwy
Mooresville, IN 46158

Re: Public Notice
PacMoore Process Technologies
Permit Level: FESOP Significant Permit Rev

(Minor PSD/EO) (120)

Permit Number: 109-40318-00062

Dear Joe Williams:

Enclosed is a copy of your draft FESOP Significant Permit Rev (Minor PSD/EO) (120), 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 Martinsville, IN publish the abbreviated version of the public notice no later than December 1, 2018. 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 Mehul Sura, 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 3-6868 or dial (317) 233-6868.

Sincerely,
Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 1/9/2017



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

Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

November 27, 2018

Martinsville Daily Reporter-Times
Attn: Classifieds
60 South Jefferson, P.O. Box 1636
Martinsville, IN 46151

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 December 1, 2018.

Please send the invoice, notarized form, clippings showing the date of publication to Bo Liu, at the Indiana Department of Environmental Management, Accounting, Room N1340, 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 Rev (Minor PSD/EO) (120)
Permit Number: 109-40318-00062

Enclosure

PN Newspaper.dot 1/9/2017



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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

November 27, 2018

To: Mooresville Public Library 220 W Harrison St Mooresville IN

From: Jenny Acker, 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: 109-40318-00062

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 1/9/2017



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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

November 27, 2018
PacMoore Process Technologies
109-40318-00062

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. 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 Letter 1/9/2017

Mail Code 61-53

IDEM Staff	LPOGOST 11/27/2018 PacMoore Process Technologies 109-40318-00062 (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: CERTIFICATE OF MAILING ONLY	

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		Joe Williams PacMoore Process Technologies 100 PacMoore Pkwy Mooresville IN 46158 (Source CAATS)										
2		Gary VanDeLaarschot President & COO 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		John Thurston 6548 E. Watson Mooresville IN 46158 (Affected Party)										
11		Lindsay Murphy August Mack Environmental, Inc. 1302 North Meridian Street Suite 300 Indianapolis IN 46202 (Consultant)										
12												
13												
14												
15												

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