INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

June 28, 2004

TO: Interested Parties / Applicant

RE: A.E. Staley Manufacturing Company / 157-6008-00033

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).
For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:
(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:
(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and

(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
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(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

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www.state.in.us/idem

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

A.E. Staley Manufacturing Company
3300 U.S. 52 South
Lafayette, Indiana 47905

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

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

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

Operation Permit No.: T157-6008-00033	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 28, 2004 Expiration Date: June 28, 2009

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary corn wet milling plant.

Responsible Official:	Timothy A. Bauer
Source Address:	3300 U.S. 52 South, Lafayette, IN 47905
Mailing Address:	2200 E. Eldorado Street, Decatur, Illinois 62525
Source Phone Number:	(217) 421-2452
SIC Code:	2046
County Location:	Tippecanoe
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act 1 of 28 PSD Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices: (Note that the maximum process capacities of these units have been included in an OAQ file that is being treated as confidential until a determination has been made):

(a) Corn Receiving and Handling Area, consisting of:

(1) One (1) Corn Receiving (Corn Unloading Dust Collector), identified as Unit ID LA-1, constructed in 1977, with a baghouse for control, exhausting to stack 1.

(2) One (1) Corn Silo (Elevator Dust Collector), identified as Unit ID LA-2, constructed in 1977, with a baghouse for control, exhausting to stack 2.

(3) Twelve (12) Corn Storage Silos, identified as Unit ID LA-78, constructed in 1977, with no emission control device, exhausting to stack 57.

(b) Corn Steeping and Milling Area, consisting of:

(1) One (1) South Pre-Steep Aspiration, identified as Unit ID LA-62A, constructed in 1995, with no emission control device, exhausting to stack 40.

(2) One (1) North Pre-Steep Aspiration, identified as Unit ID LA-62B, constructed in 1995, with no emission control device, exhausting to stack 41.

(3) One (1) Millhouse Aspiration Process, identified as Unit ID LA-70, constructed in 1977, with a scrubber for control, exhausting to stack 4.

(c) Feed House and Boiler House Area, consisting of:

(1) One (1) natural gas/No. 2 fuel oil fired Zurn Boiler, identified as Unit ID LA-44, constructed in 1977, with a maximum heat input of 227 MMBtu/hr, with no emission control device, exhausting to stack 34.

(2) One (1) coal fired Riley Stoker Boiler, identified as Unit ID LA-45, constructed in 1977, with a maximum heat input of 239 MMBtu/hr, with a multiclone and an electrostatic precipitator for control, exhausting to stack 4.

(3) One (1) natural gas/No. 2 fuel oil fired Cleaver Brooks Boiler, identified as Unit ID LA-46, constructed in 1980, with a maximum heat input of 49 MMBtu/hr, with no emission control device, exhausting to stack 4.

(4) One (1) natural gas/No. 2 fuel oil fired Fiber Pre-Dryer, identified as Unit ID LA-8, constructed in 1977, with a maximum heat input of 58 MMBtu/hr, with an integral product collector/cyclone and a scrubber (ID LA-67) for control, exhausting to stack 4.

(5) One (1) natural gas/No. 2 fuel oil fired DSLC Dryer, identified as Unit ID LA-17A, constructed in 1977, with a maximum heat input of 45 MMBtu/hr, with a scrubber (ID LA-67) and an integral product collector/cyclone for control, exhausting to stack 4.

(6) One (1) natural gas/No. 2 fuel oil fired Gluten Dryer, identified as Unit ID LA-15, constructed in 1995, with a maximum heat input of 52 MMBtu/hr, with a scrubber (ID LA-68), an integral product collector/cyclone and Low NOx Burner for control, exhausting to stack 4.

(7) One (1) Germ RST Pre-Dryer, identified as Unit ID LA-60, constructed in 1995, an integral product collector/cyclone and a scrubber (ID LA-69) for control, exhausting to stack 4.

(8) One (1) natural gas/No. 2 fuel oil fired GR Dryer, identified as Unit ID LA-47, constructed in 1980, with a maximum heat input of 55 MMBtu/hr, with an integral product collector/cyclone and a scrubber (ID LA-69) for control, exhausting to stack 4.

(9) One (1) Germ RST Finish Dryer No.3, identified as Unit ID LA-53, constructed in 1991, with a cyclone (not integral) for control, exhausting to stack 7.

(10) One (1) Feedhouse Aspiration System, identified as Unit ID LA-71, constructed in 1977, with scrubber for control (ID LA-71), exhausting to stack 4.

(11) One (1) Feed Cooler and Cyclone, identified as Unit ID LA-17B, constructed in 1977, with an integral product collector/cyclone and scrubber (ID LA-17B) for control, exhausting to stack 4.

(12) One (1) Cracked Corn to Gr. Conveyor Transfer Cyclone, identified as Unit ID LA-43, constructed in 1977, with an integral product collector/cyclone (ID LA-43) and a scrubber (ID LA-17B) for control, exhausting to stack 4.

(d) Feed Products Storage and Loadout Area, consisting of:

(1) One (1) Corn Cleanings Bin, identified as Unit ID LA-22, constructed in 1977, with a baghouse for control, exhausting to stack 3.

(2) One (1) Gluten Conveyor to Storage/Loadout, identified as Unit ID LA-21, constructed in 1977, with a baghouse for control, exhausting to stack 10.

(3) One (1) Cooled Germ Conveyor to Storage Bin, identified as Unit ID LA-18, constructed in 1977, with a baghouse for control, exhausting to stack 11.

(4) One (1) Gluten Loadout, identified as Unit ID LA-21B, constructed in 2004, with a baghouse for control, exhausting to stack 9.

(5) One (1) Pellet Cooler #1, identified as Unit ID LA-79, constructed in 2004, with a cyclone (not integral) for control, exhausting to stack 58.

(6) One (1) Combo Pellet Cooler, identified as Unit ID LA-63, constructed in 1995, a cyclone (not integral) for control, exhausting to stack 42.

(7) One (1) Pellet Cooler #4, identified as Unit ID LA-80, constructed in 2004, with an cyclone (not integral) for control, exhausting to stack 59.

(8) One (1) Pellet Cooler #5, identified as Unit ID LA-81, constructed in 2004, with an cyclone (not integral) for control, exhausting to stack 60.

(9) One (1) Pellet Storage Bin, identified as Unit ID LA-64, constructed in 1995, with a integral baghouse for control, exhausting to stack 43.

(10) One (1) Hammermill Aspiration Process, identified as Unit ID LA-77, constructed in 2000, with a scrubber for control, exhausting to stack 54.

(11) One (1) Feed Dump Aspiration System, identified as Unit ID LA-83, constructed in 2004, with a baghouse for control, exhausting to stack 62.

(12) One (1) blond Pellet Bin, identified as Unit ID LA-82, constructed in 2004, with two baghouses for control, exhausting to stack 61.

(e) Refinery Area, consisting of:

(1) One (1) Mud Centrifuges Vent #1, identified as Unit ID LA-72, constructed in 1977, with no emission control device, exhausting to stack 46.

(2) One (1) Mud Centrifuges Vent #2, identified as Unit ID LA-73, constructed in 1977, with no emission control device, exhausting to stack 47.

(3) One (1) Mud Centrifuges Vent #3, identified as Unit ID LA-74, constructed in 1977, with no emission control device, exhausting to stack 53.

(4) One (1) Jets Foam Trap, identified as Unit ID LA-75, constructed in 1977, with no emission control device, exhausting to stack 48.

(5) One (1) Soda Ash Unloading and Storage, identified as Unit ID LA-29, constructed in 1977, with a scrubber for control, exhausting to stack 19.

(6) Two (2) Hydrochloric Acid Storage Tanks, identified as Unit ID LA-41, constructed in 1977, with a scrubber for control, exhausting to stack 32.

(7) One (1) Hydrochloric Acid Supply Head Tank, identified as Unit ID LA-76, constructed in 1977, with a scrubber for control, exhausting to stack 50.

(8) One (1) Cation IX Drain Tank, identified as Unit ID LA-65A, constructed in 1977, with a scrubber for control, exhausting to stack 51.

(9) One (1) Filter Aid Truck Unloading to West Storage Bin, identified as Unit ID LA-31, constructed in 1977, with a baghouse for control, exhausting to stack 20A.

(10) One (1) Filter Aid Truck Unloading to East Storage Bin, identified as Unit ID LA-31, constructed in 1977, with a baghouse for control, exhausting to stack 20B.

(11) One (1) Filter Aid Transfer from Storage Bins to Weighing Hopper, identified as Unit ID LA-32, constructed in 1993, with a baghouse for control, exhausting to stack 21.

(12) One (1) MBS Aspiration System, identified as Unit ID LA-61, constructed in 1995, with a scrubber for control, exhausting to stack 49.

(13) One (1) natural gas/No. 2 fuel oil fired Carbon Reactivation Furnace, identified as Unit ID LA-28, constructed in 1977, with a maximum heat input of 22 MMBtu/hr, with a scrubber for control, exhausting to stack 33.

(14) One (1) Krystar Dryer/Cooler, identified as Unit ID LA-51, constructed in 1995, with emissions controlled by two integral cyclones/product collectors (53L605) and a wet scrubber (53L606), exhausting to stack 35.

(f) Coal and Ash Storage and Handling Area, consisting of:

(1) One (1) Coal Unloading Building Aspiration System, identified as Unit ID LA-33, constructed in 1977, with a baghouse for control, exhausting to stack 22.

(2) One (1) Crusher and Transfer Building Aspiration System, identified as Unit ID LA-34, constructed in 1977, with a baghouse for control, exhausting to stack 23.

(3) One (1) Coal Storage Silos Top Aspiration System, identified as Unit ID LA–35, constructed in 1977, with a baghouse for control, exhausting to stack 24.

(4) One (1) Coal Storage Silos Bottom Aspiration System, identified as Unit ID LA-36, constructed in 1977, with a baghouse for control, exhausting to stack 25.

(5) One (1) Utility Building Aspiration System #1, identified as Unit ID LA-37, constructed in 1977, with a baghouse for control, exhausting to stack 26.

(6) One (1) Utility Building Aspiration System #2, identified as Unit ID LA-38, constructed in 1977, with a baghouse for control, exhausting to stack 27.

(7) One (1) Coal Silo Aspiration System, identified as Unit ID LA-55, constructed in 1977, with a rotoclone for control, exhausting to stack 28.

(8) One (1) Coal Bunkers Aspiration, identified as Unit ID LA-56, constructed in 1977, with a rotoclone for control, exhausting to stack 29.

(9) One (1) Ash Transfer Aspiration Vacuum Blower #1, identified as Unit ID LA-42A, constructed in 1977, with a baghouse for control, exhausting to stack 30A.

(10) One (1) Ash Transfer Aspiration Vacuum Blower #2, identified as Unit ID LA-42A, constructed in 1977, with a baghouse for control, exhausting to stack 30B.

(11) One (1) Ash Silo Aspiration Air East Vent, identified as Unit ID LA-42B, constructed in 1977, with a dampered vent, exhausting to stack 31A.

(12) One (1) Ash Silo Aspiration Air West Vent, identified as Unit ID LA-42B,

constructed in 1977, with a dampered vent, exhausting to stack 31B.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

(a) Coal bunker and coal scale exhausts and associated dust collector vents [326 IAC 6-3-2].

(b) Vents from ash transport systems not operated at positive pressure [326 IAC 6-3-2].

(c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(d) Structural steel and bridge fabrication activities using 80 tons or less of welding consumables. [326 IAC 6-3-2]

(e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

(f) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO2; 5 lb/hr or 25 lb/day NOx; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

(1) Germ Day Bin, exhausting to stack 61. [326 IAC 6-3-2]

(2) Starch/Gluten Loadout, exhausting to stack 8. [326 IAC 6-3-2]

(3) Salt Storage Tank, exhausting to stack 12. [326 IAC 6-3-2]

(4) Soda Ash Head Tank, exhausting to stack 52. [326 IAC 6-3-2]

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

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

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). 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 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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 Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(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 or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 the unit.

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

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

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

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

(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 Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

(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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The

Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. 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.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) 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.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [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 Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1,utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section(BLT)), to determine the appropriate permit fee.

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

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2(c)]

(a) Pursuant to [40 CFR 52 Subpart P], particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) 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. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

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:

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable

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

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

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. The provisions of 326 IAC 1-7-1(3), 1-7-2, 1-7-3(c) and (d), 1-7-4, and 1-7-5(a), (b), and (d) are not federally enforceable.

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
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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 by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 14-10-4-1, 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 Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, 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 Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment.

(b) In the event that a breakdown of a continuous opacity monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.

(c) Whenever a continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup COM shall be brought online within four (4) hours of shutdown of the primary COM, if possible. If this is not possible, visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of one (1) hour beginning four (4) hours after the start of the malfunction or down time.

(1) If the reading period begins less than one hour before sunset, readings shall be performed until sunset. If the first required reading period would occur between sunset and sunrise, the first reading shall be performed as soon as there is sufficient daylight.

(2) Method 9 opacity readings shall be repeated for a minimum of one (1) hour at least once every four (4) hours during daylight operations, until such time that the continuous opacity monitor is back in operation.

(3) All of the opacity readings during this period shall be reported in the Quarterly Deviation and Compliance Monitoring Reports.

(d) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5, and 326 IAC 2-2.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.

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

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

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on November 14, 2000.

(b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63 , such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan; is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

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

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) 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 the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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

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

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) (“Regulated pollutant which is used only for purposes of Section 19 of this rule”) from the source, for purposes of fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) The emission statement 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.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of required monitoring data, reports and support information required by this Permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(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) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.22 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 the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply

with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

Part 2 MACT Application Submittal Requirement

C.23 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

(a) The Permittee shall submit a Part 2 Maximum Achievable Control Technology (MACT) Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:

(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;

(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or

(3) The MACT standard or standards for the affected source categories included at the source are promulgated.

(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Corn Receiving and Handling Area, consisting of:

(1) One (1) Corn Receiving (Corn Unloading Dust Collector), identified as Unit ID LA-1, constructed in 1977, with a baghouse for control, exhausting to stack 1.

(2) One (1) Corn Silo (Elevator Dust Collector), identified as Unit ID LA-2, constructed in 1977, with a baghouse for control, exhausting to stack 2.

(3) Twelve (12) Corn Storage Silos, identified as Unit ID LA-78, constructed in 1977, with no emission control device, exhausting to stack 57.

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

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

D.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP 157-3581-00033, issued February 27, 1995:

(a) The PM/PM10 emissions from LA-1 shall not exceed 1.89 pounds per hour and 8.3 tons per year.

(b) The PM/PM10 emissions from LA-2 shall not exceed 1.03 pounds per hour and 4.5 tons per year.

Compliance with these limits shall render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable for PM and PM10.

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

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from facilities LA-1, LA-2 and LA-78 shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

Or depending on the process weight rate:

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

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

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughputs of the respective facilities are treated as confidential until a determination has been made.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of

this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.4 Particulate Control

In order to comply with Conditions D.1.1 and D.1.2, the baghouses for particulate control shall be in operation and control emissions from LA-1 and LA-2 at all times that the facilities are in operation.

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

D.1.5 Visible Emissions Notations

(a) Visible emission notations of LA-1 and LA-2 stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with facilities LA-1 and LA-2, at least once per day when LA-1 and LA-2 are in operation. When for any one reading or observance, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.7 Baghouse Inspections

(a) An internal inspection of all bags, controlling particulate emissions from facilities LA-1 and LA-2, shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

(b) Inspections shall also be performed whenever the respective baghouse is out of service for more than 24 consecutive hours. However, an inspection is not required if one has been conducted within the previous two months. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it has been 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.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have 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).

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

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.5, the Permittee shall maintain records of the once per day visible emission notations.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain records of the once per day pressure drop readings.

(c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections.

(d) To document compliance with Condition D.1.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Section D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(b) Corn Steeping and Milling Area, consisting of:

(1) One (1) South Pre-Steep Aspiration, identified as Unit ID LA-62A, constructed in 1995, with no emission control device, exhausting to stack 40.

(2) One (1) North Pre-Steep Aspiration, identified as Unit ID LA-62B, constructed in 1995, with no emission control device, exhausting to stack 41.

(3) One (1) Millhouse Aspiration Process, identified as Unit ID LA-70, constructed in 1977, with a scrubber for control, exhausting to stack 4.

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

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

D.2.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP 157-3581-00033, issued February 27, 1995 and amended April 5, 1995:

(a) The sulfur dioxide emissions from LA-62A and LA-62B shall not exceed 1.37 pounds per hour. Compliance with this limit is equivalent to sulfur dioxide emissions of less than 6.0 tons per year.

(b) The total sulfur dioxide emissions from scrubber LA-70 (controlling emissions from the millhouse) shall not exceed 12.85 pounds per hour and the concentration of sulfur dioxide in the exhaust shall not exceed 17 ppm. Compliance with this limit is equivalent to sulfur dioxide emissions of less than 56.3 tons per year.

Compliance with these limits shall render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable for SO_2.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.2.3 Sulfur Dioxide Control

In order to comply with Conditions D.2.1, the scrubber shall be in operation and control emissions from LA-70 at all times that the facility is in operation.

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

D.2.4 Monitoring for Scrubber

(a) The Permittee shall monitor the pH of the scrubbing liquid of the scrubber controlling emissions from LA-70 every hour during normal operation. The pH shall not be less than 5.0 and shall average 7.0 based on twelve (12) consecutive one-hour pH readings recorded during each shift.

(b) The Permittee shall monitor the scrubber recirculation rate of the scrubber controlling emissions from LA-70 every hour during normal operation.

(c) The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when the pH, flow rate, and pressure drop readings are outside of the respective normal ranges, as specified by the manufacturer, for any one reading. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.

(d) The instruments used for determining the pH and flow rate shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.5 Scrubber Inspections

An inspection of the scrubbers controlling emissions from LA-70 shall be performed semi-annually. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.

D.2.6 Scrubber Malfunction

In the event that a scrubber malfunction has been observed:

Failed units and the associated process will be shut down immediately until the failed units have 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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.2.7 Record Keeping Requirements

(a) To document compliance with Condition D.2.4, the Permittee shall maintain hourly records of the pH of the scrubbing liquid and scrubber recirculation rate of the scrubber controlling emissions from LA-70.

(b) To document compliance with Conditions D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5.

(c) To document compliance with Condition D.2.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(c) Feed House and Boiler House Area, consisting of:

(1) One (1) natural gas/No. 2 fuel oil fired Zurn Boiler, identified as Unit ID LA-44, constructed in 1977, with a maximum heat input of 227 MMBtu/hr, with no emission control device, exhausting to stack 34.

(2) One (1) coal fired Riley Stoker Boiler, identified as Unit ID LA-45, constructed in 1977, with a maximum heat input of 239 MMBtu/hr, with a multiclone and an electrostatic precipitator for control, exhausting to stack 4.

(3) One (1) natural gas/No. 2 fuel oil fired Cleaver Brooks Boiler, identified as Unit ID LA-46, constructed in 1980, with a maximum heat input of 49 MMBtu/hr, with no emission control device, exhausting to stack 4.

(4) One (1) natural gas/No. 2 fuel oil fired Fiber Pre-Dryer, identified as Unit ID LA-8, constructed in 1977, with a maximum heat input of 58 MMBtu/hr, with an integral product collector/cyclone and a scrubber (ID LA-67) for control, exhausting to stack 4.

(5) One (1) natural gas/No. 2 fuel oil fired DSLC Dryer, identified as Unit ID LA-17A, constructed in 1977, with a maximum heat input of 45 MMBtu/hr, with a scrubber (ID LA-67) and an integral product collector/cyclone for control, exhausting to stack 4.

(6) One (1) natural gas/No. 2 fuel oil fired Gluten Dryer, identified as Unit ID LA-15, constructed in 1995, with a maximum heat input of 52 MMBtu/hr, with a scrubber (ID LA-68), an integral product collector/cyclone and Low NO_x Burner for control, exhausting to stack 4.

(7) One (1) Germ RST Pre-Dryer, identified as Unit ID LA-60, constructed in 1995, an integral product collector/cyclone and a scrubber (ID LA-69) for control, exhausting to stack 4.

(8) One (1) natural gas/No. 2 fuel oil fired GR Dryer, identified as Unit ID LA-47, constructed in 1980, with a maximum heat input of 55 MMBtu/hr, with an integral product collector/cyclone and a scrubber (ID LA-69) for control, exhausting to stack 4.

(9) One (1) Germ RST Finish Dryer No.3, identified as Unit ID LA-53, constructed in 1991, with a cyclone (not integral) for control, exhausting to stack 7.

(10) One (1) Feedhouse Aspiration System, identified as Unit ID LA-71, constructed in 1977, with scrubber for control (ID LA-71), exhausting to stack 4.

(11) One (1) Feed Cooler and Cyclone, identified as Unit ID LA-17B, constructed in 1977, with an integral product collector/cyclone and scrubber (ID LA-17B) for control, exhausting to stack 4.

(12) One (1) Cracked Corn to Gr. Conveyor Transfer Cyclone, identified as Unit ID LA-43, constructed in 1977, with an integral product collector/cyclone (ID LA-43) and a scrubber (ID LA-17B) for control, exhausting to stack 4.

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

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

D.3.1 CO Emissions [326 IAC 2-2] [326 IAC 2-7-6(3)] [326 IAC 2-7-15]

The IDEM, OAQ has information that indicates that the CO emissions from facilities LA-45, LA-46, LA-8, LA-15, LA-17A, LA-47, LA-44, and LA-28 have contributed to a violation of 326 IAC 2-2 (Prevention of Significant Deterioration). Therefore, the Permit Shield provided in Section B of this permit does not apply to those emission units with regards to 326 IAC 2-2 (PSD). The OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 2-2 (PSD) and a schedule for achieving compliance with such requirements once this issue has been thoroughly reviewed.

D.3.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2] [40 CFR 52.21]

(a) Pursuant to OP 79-07-89-0345, issued February 5, 1986:

(1) The particulate emissions from LA-44 shall not exceed 45.4 pounds per hour and 198.9 tons per year.

(2) The sulfur dioxide emissions from LA-44 shall not exceed 363.2 pounds per hour and 1590.8 tons per year.

(3) The particulate emissions from LA-46 shall not exceed 9.8 pounds per hour and 42.9 tons per year.

(4) The sulfur dioxide emissions from LA-46 shall not exceed 78.4 pounds per hour and 343.4 tons per year.

Compliance with these particulate and sulfur dioxide limitations will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration).

(b) Pursuant to CP 157-3581-00033, issued February 27, 1995 and amended April 5, 1995:

(1) The total PM/PM10 emissions from LA-43 and LA-17B shall not exceed 6.43 pounds per hour. Compliance with this limit is equivalent to PM/PM10 emissions of 28.16 tons per year.

(2) The PM/PM10 emissions from LA-53 shall not exceed 4.29 pounds per hour. Compliance with this limit is equivalent to PM/PM10 emissions of 18.77 tons per year.

(3) The total sulfur dioxide emissions from scrubbers LA-70 and LA-71 (controlling emissions from various insignificant activities in the feedhouse and millhouse, respectively) shall not exceed 12.85 pounds per hour and the concentration of sulfur dioxide in the exhaust from scrubber LA-70 and LA-71 shall not exceed 17 ppm. Compliance with this limit is equivalent to sulfur dioxide emissions of less than 56.3 tons per year.

(4) The amount of No. 2 fuel oil consumed by LA-15 shall not exceed 1,662,480 gallons per twelve consecutive month period with compliance determined at the end of each month and the sulfur content of the fuel oil shall not exceed 0.5% sulfur. Compliance with this limit, including the effect of scrubber LA-68, is equivalent to SO_2 emissions of less than 29.5 tons per year.

(5) The nitrogen oxide (NO_x) emissions from LA-15 shall not exceed 7.59 pounds per hour. Compliance with this limit shall be met with the use of low-NO_x burners and is equivalent to NO_x emissions of less than 33.3 tons per year.

Compliance with these limits shall render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable for the respective pollutants.

(c) Pursuant to SSM 157-11449-00033, issued August 16, 2000, and CP 157-3581-00033, issued February 27, 1995:

(1) The concentration of sulfur dioxide in the exhaust from scrubbers LA-67, LA-68, and LA-69 (controlling emissions from LA-8, LA-17A, LA-15, LA-47 and LA-60 shall not exceed 187 parts per million (ppm). Based on a total exhaust flow rate of 353,600 acfm at 138EF, compliance with this limit is equivalent to total SO_2 emissions of less than 582 pounds per hour and 2,549 tons per year.

(2) The particulate emissions from LA-45 shall not exceed 0.2 pounds per MMBtu heat input. Compliance with this limit will satisfy the requirements of 326 IAC 6-2-3(d) and will provide an emission credit which may be used at a future date pursuant to 326 IAC 2-2.

Compliance with these limits shall render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable for PM, PM10 and SO_2.

(d) Pursuant to PSD 79-1551, issued August 31, 1984, and as revised by this permit, the NO_x emissions from:

(1) LA-45 shall not exceed 119 pounds per hour and 523 tons per twelve consecutive month period.

(2) LA-46 shall not exceed 7.1 pounds per hour and 31 tons per twelve consecutive month period.

(3) LA-8 shall not exceed 65.6 pounds per hour and 287 tons per twelve consecutive month period.

(4) LA-17A shall not exceed 6.6 pounds per hour and 29 tons per twelve consecutive month period.

(5) LA-15 shall not exceed 93.4 pounds per hour and 409 tons per twelve consecutive month period.

(6) LA-47 shall not exceed 7.9 pounds per hour and 34.4 tons per twelve consecutive month period.

(7) LA-44 shall not exceed 32.4 pounds per hour and 142 tons per year; and

(8) LA-28 shall not exceed 3.2 pounds per hour and 14 tons per year.

Compliance with these limits is equivalent to total NO_x emissions from these facilities of less than 1,469 tons per year and will satisfy the requirements of 326 IAC 2-2.

(e) Pursuant to PSD 79-1551, issued August 31, 1984, and as revised by this permit, the carbon monoxide (CO) emissions from:

(1) LA-45 shall not exceed 4.59 pounds per hour and 20 tons per twelve consecutive month period.

(2) LA-46 shall not exceed 4.11 pounds per hour and 18 tons per twelve consecutive month period.

(3) LA-8 shall not exceed 4.86 pounds per hour and 21 tons per twelve consecutive month period.

(4) LA-17A shall not exceed 3.79 pounds per hour and 17 tons per twelve consecutive month period.

(5) LA-15 shall not exceed 4.36 pounds per hour and 19 tons per twelve consecutive month period.

(6) LA-47 shall not exceed 4.61 pounds per hour and 20 tons per twelve consecutive month period.

(7) LA-44 shall not exceed 19.1 pounds per hour and 84 tons per year; and

(8) LA-28 shall not exceed 1.85 pounds per hour and 8.0 tons per year.

Compliance with these limits is equivalent to total CO emissions from these facilities of less than 208 tons per year and will satisfy the requirements of 326 IAC 2-2.

D.3.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from facilities LA-8, LA-17A, LA-17B, LA-15, LA-60, LA-47, LA-43 and LA-53 shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

Or depending on the process weight rate:

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

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

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughputs of the respective facilities is treated as confidential until a determination has been made.

(b) Pursuant to AA 157-16939-00033 issued on March 25, 2003 and SSM 157-11449-00033 issued on August 16, 2000 particulate matter emissions from LA-67, LA-68 and LA-69 (controlling emissions from LA-8, LA-17A, LA-15, LA-47 and LA-60) shall be limited to a total of 61.12 pounds per hour after controls. Compliance with this limit will satisfy 326 IAC 6-3-2.

D.3.4 Particulate Matter (Sources of Indirect Heating) [326 IAC 6-2-3(e)]

Pursuant to 326 IAC 6-2-3(e), the particulate matter emissions from boilers LA-44, LA-45 and LA-46 shall not exceed 0.6 pounds per MMBtu heat input each.

D.3.5 Sulfur Dioxide [326 IAC 7-1.1-2] [326 IAC 7-2-1]

(a) Pursuant to 326 IAC 7-1.1-2(a)(3), the sulfur dioxide (SO_2) emissions from LA-8, LA-15, LA-17A, LA-46 and LA-47 shall each not exceed 0.5 pounds per MMBtu heat input when combusting #2 fuel oil. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calender month average.

(b) Pursuant to 326 IAC 7-1.1-2(a)(1), the sulfur dioxide emissions from boiler LA-45 shall not exceed 6.0 pounds per MMBtu heat input when combusting coal. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

(c) The sulfur content of the fuel oil combusted in LA-46 shall not exceed forty-five hundredths percent (0.45 %). Compliance with this limit is equivalent to SO_2 emissions of 0.5 pounds per MMBtu, will satisfy the requirements of 326 IAC 7-1.1, and will ensure compliance with Condition D.3.1(b)(4).

D.3.6 Volatile Organic Compounds -BACT [326 IAC 8-1-6]

Pursuant to SSM 157-11449-00033, issued August 16, 2000, and 326 IAC 8-1-6, the VOC emissions from facilities LA-15 and LA-60 shall be controlled by wet scrubbers, determined to be BACT, having at least forty five percent (45%) overall VOC control efficiency.

D.3.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

(a) A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

(b) The PMP for an electrostatic precipitator controlling emissions from LA-45 shall include the following inspections, performed according to the indicated schedules:

(1) Plate and electrode alignment no less than every 2 years;

(2) ESP TR set components, performed whenever there is an outage of any nature lasting more than three days, unless such inspections have been performed within the last six months. At a minimum, the following inspections shall be performed:

(A) Internal inspection of shell for corrosion (including but not limited to doors, hatches, insulator housings, and roof area).

(B) Effectiveness of rapping (including but not limited to buildup of dust on discharge electrodes and plates).

(C) Gas distribution (including but not limited to buildup of dust on distribution plates and turning vanes).

(D) Dust accumulation (including but not limited to buildup of dust on shell and support members that could result in grounds or promote advanced corrosion).

(E) Major misalignment of plates (including but not limited to a visual check of plate alignment).

(F) Rapper, vibrator and TR set control cabinets (including but not limited to motors and lubrication).

(G) Rapper assembly (including but not limited to loose bolts, ground wires, water in air lines, and solenoids).

(H) Vibrator and rapper seals (including but not limited to air in-leakage, wear, and deterioration).

(I) TR set controllers (including but not limited to low voltage trip point, over current trip point, and spark rate).

(J) Vibrator air pressure settings.

(3) Air and water infiltration, once per month. The recommended method for this inspection is for audible checks around ash hoppers/hatches, duct expansion joints, and areas of corrosion.

(c) The PMP for a multiclone shall include inspections of the internal components of the multiclone, conducted annually in accordance with the Section B - Preventive Maintenance Plan. Items to be checked include air infiltration, plugging of inlet spinner vanes, outlet tube erosion, deposits on the inside surfaces of the cyclone tubes, and plugging of the bottom of the cyclone tubes.

Compliance Determination Requirements

D.3.8 Particulate, Sulfur Dioxide, and VOC Control

In order to comply with Conditions D.3.1 through D.3.5, the cyclones and scrubbers, including those cyclones integral to the process, shall be in operation and control emissions from LA-8, LA-17A, LA-17B, LA-15, LA-60, LA-47, LA-43 and LA-53 at all times that the facilities are in operation.

D.3.9 Operation of Electrostatic Precipitator [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule or in this permit, the electrostatic precipitator (ESP) shall be operated at all times that the boiler LA-45 vented to the ESP is in operation.

D.3.10 Operation of Multiclone [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule or in this permit, the multiclone shall be operated at all times that the boiler LA-45 vented to the multiclone is in operation.

D.3.11 Sulfur Dioxide Emissions and Sulfur Content

Compliance with Condition D.3.4 shall be determined pursuant to 326 IAC 3-7-4. The Permittee shall demonstrate that the sulfur dioxide emissions from LA-8, LA-15, LA-17A and LA-46 do not exceed five-tenths (0.5) pound per million Btu heat input when combusting #2 fuel oil by:

(a) Providing vendor analysis of fuel delivered (including Btu per gallon and percent sulfur), if accompanied by a vendor certification, or;

(b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

A determination of noncompliance pursuant to the method specified above shall not be refuted by evidence of compliance pursuant to the other method.

D.3.12 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6]

In order to demonstrate compliance with Condition D.3.4(b) and pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions from LA-45 do not exceed six (6.0) pounds per MMBtu when combusting coal. Compliance shall be determined utilizing the following options:

(a) Providing vendor analysis of coal delivered. If accompanied by a certification from the fuel supplier, the certification shall include:

(1) The name of the coal supplier; and

(2) The location of the coal when the sample was collected for analysis to determine the properties of the coal, specifically including whether the coal was sampled as delivered to the affected facility or whether the coal was collected from coal in storage at the mine, at a coal preparation plant, at a coal supplier's facility, or at another location. The certification shall include the name of the coal mine (and coal seam), coal storage facility, or coal preparation plant (where the sample was collected); and

(3) The results of the analysis of the coal from which the shipment came (or of the shipment itself) including the sulfur content, moisture content, ash content, and heat content; and

(4) The methods used to determine the properties of the coal; and

(b) Sampling and analyzing the coal using one of the following procedures:

(1) Minimum Coal Sampling Requirements and Analysis Methods:

(A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;

(B) Coal shall be sampled at least one (1) time per shift;

(C) Minimum sample size shall be five hundred (500) grams;

(D) Samples shall be composited and analyzed at the end of each calendar month;

(E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or

(2) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or

(c) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from LA-45, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]

A determination of noncompliance pursuant to any of the methods specified in (a), (b), or (c) above shall not be refuted by evidence of compliance pursuant to the other method.

D.3.13 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Pursuant to SSM 157-11449-00033, issued August 16, 2000, the Permittee shall perform PM, PM_{10}, VOC, and SO_2 testing on LA-67, LA-68, and LA-69 no later than May 19, 2008, utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. If PM-10 is assumed to be 100% of PM, only PM tests need be performed. Testing shall be conducted in accordance with Section C- Performance Testing.

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

D.3.14 Visible Emissions Notations

(a) Visible emission notations of the exhaust from stacks 4 and 7 (exhausting emissions from facilities LA-8, LA-17A, LA-17B, LA-15, LA-60, LA-47, LA-43, LA-46 and LA-53)

shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) Visible emission notations of the exhaust from stack 34 (exhausting emissions from LA-44) shall be performed once per shift during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.

(c) 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.

(d) 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.

(e) 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.

(f) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.3.15 Cyclone Inspections

An inspection shall be performed at least each calendar year of the cyclone controlling LA-53. Inspections required by this condition shall not be performed in consecutive months.

D.3.16 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. 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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.3.17 Scrubber Monitoring

(a) The Permittee shall monitor the pH of the recycled water from scrubbers LA-67, LA-68, and LA-69 at least once per hour during normal operation. The pH shall not be less than 5.0 for any one reading and not less than 7.0 based on a twelve-reading average determined at least once per shift.

(b) The Permittee shall monitor the pH of the recycled water from scrubber LA-71 at least once per hour during normal operation. The pH shall not be less than 5.0 for any one reading and not less than 7.0 based on a twelve-reading average determined at least once per shift.

(c) The Permittee shall monitor the scrubbant flow rate of the gaseous and particulate sections of scrubber LA-67 at least once per hour during normal operation. The scrubbant flow rates for the gaseous and particulate sections of LA-67 shall not average less than 1000 gallons per minute and 200 gallons per minute, respectively, based on a twelve-reading average determined at least once per shift.

(d) The Permittee shall monitor the scrubbant flow rate of scrubber LA-68 at least once per hour during normal operation. The scrubbant flow rates shall not average less than 200 gallons per minute based on a twelve-reading average determined at least once per shift.

(e) The Permittee shall monitor the scrubbant flow rate of the gaseous and particulate sections of scrubber LA-69 at least once per hour during normal operation. The scrubbant flow rates for the gaseous and particulate sections of LA-69 shall not average less than 500 gallons per minute and 100 gallons per minute, respectively, based on a twelve-reading average determined at least once per shift.

(f) The Permittee shall monitor the scrubbant flow rate of scrubber LA-17B at least once per hour during normal operation. The scrubbant flow rate shall not average less than 175 gallons per minute based on a twelve-reading average determined at least once per shift.

(g) The Compliance Response Plan for the scrubbers shall contain troubleshooting contingency and corrective actions for when the pH and flow rate readings are outside of the specified ranges for any one reading. A pH or flow rate reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.

(h) The instruments used for determining the pH and flow rates shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.3.18 Scrubber Inspections

An inspection of the scrubbers controlling emissions from LA-8, LA-17A, LA-17B, LA-15, LA-60, LA-47, LA-71 and LA-43 shall be performed at least once per year. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.

D.3.19 Scrubber Malfunction

In the event that a scrubber malfunction has been observed:

Failed units and the associated process will be shut down immediately until the failed units have 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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.3.20 Continuous Opacity Monitoring [326 IAC 3-5]

Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), and 326 IAC 2, a continuous monitoring system shall be installed, calibrated, maintained, and operated to measure the opacity of the exhaust from boiler LA-45 to ensure compliance with Conditions D.3.1, D.3.2, and D.3.3. The continuous opacity monitoring system shall meet the performance specifications of 326 IAC 3-5-2.

D.3.21 Opacity Readings

The ability of the continuous opacity monitor (COM) to monitor particulate emissions from boiler LA-45 shall be monitored by continuously measuring and recording the opacity of emissions from the stack exhaust.

Appropriate response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the opacity from

the boiler exceeds thirty percent (30%) for any three (3) consecutive six-minute average period. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.3.22 Method 9 Opacity Readings and Visible Emissions Notations

(a) Whenever a continuous opacity monitor (COM) is malfunctioning, the Permittee shall follow the procedures in accordance with Section C - Maintenance of Continuous Opacity Monitoring Equipment, until such time that the continuous opacity monitor is back in operation.

(b) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed or whenever the opacity from a boiler exceeds thirty-eight percent (38%) for any two consecutive six-minute average periods. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.3.23 Record Keeping Requirements

(a) To document compliance with Condition D.3.1(b)(4), the Permittee shall maintain records of the amount of No. 2 fuel oil consumed by LA-15; these records shall be made available to the Commissioner upon request.

(b) To document compliance with Condition D.3.4, the Permittee shall maintain records in accordance with (1) through (9) below. Records maintained for (1) through (9) shall be taken monthly and shall be complete and sufficient to establish compliance with the sulfur dioxide emission limit established in Condition D.3.4.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) Actual coal usage since last compliance determination period and equivalent sulfur dioxide emissions;

(4) Sulfur content, heat content, and ash content;

(5) Vendor analysis of coal and coal supplier certification; and

(6) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

(7) Fuel supplier certifications;

(8) The name of the fuel supplier; and

(9) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

(c) To document compliance with Condition D.3.6, the Permittee shall maintain records of

the results of all boiler and emission control equipment inspections, including any additional inspections prescribed by the Preventive Maintenance Plans.

(d) To document compliance with Condition D.3.13, the Permittee shall maintain records of the once per shift visible emission notations.

(e) To document compliance with Conditions D.3.14 and D.3.17, the Permittee shall maintain records of the results of the inspections.

(f) To document compliance with Condition D.3.16, the Permittee shall maintain records of the:

(1) Hourly pH readings of scrubbers LA-67, LA-68, LA-69 and LA-71;

(2) Hourly scrubbant flow rate readings of scrubbers LA-67, LA-68, LA-69 and LA-17B;

(3) Average pH of the scrubbant of scrubbers LA-67, LA-68, LA-69 and LA-71, determined once per shift based on twelve one-hour readings; and

(4) Average scrubbant flow rate of scrubbers LA-67, LA-68, LA-69 and LA-71, determined once per shift based on twelve one-hour readings.

(g) To document compliance with Condition D.3.19, the Permittee shall record the pressure drop across the multiclone.

(h) To document compliance with Conditions D.3.20, D.3.21, and D.3.22, the Permittee shall maintain records of the continuous opacity monitoring (COM) data in accordance with 326 IAC 3-5. When the COM system is not functioning, the Permittee shall maintain the necessary records pursuant to Section C - Maintenance of Continuous Opacity Monitoring Equipment, and Compliance Response Plan - Preparation, Implementation, Records, and Reports. Records must be complete and sufficient to establish compliance with the limits established in this section.

(i) Pursuant to 326 IAC 3-7-5(a), the Permittee shall develop a standard operating procedure (SOP) to be followed for sampling, handling, analysis, quality control, quality assurance, and data reporting of the information collected pursuant to 326 IAC 3-7-2 through 326 IAC 3-7-4. In addition, any revision to the SOP shall be submitted to IDEM, OAQ.

(j) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.24 Reporting Requirements

(a) A certification, signed by the responsible official, shall be submitted, that certifies all of the fuels combusted during the twelve month period.

(b) The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas-fired boiler certification submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) A semi-annual summary of the information to document compliance with Condition D.3.4 in any compliance period when No. 2 fuel oil was combusted, and the natural gas fired boiler certification, shall be submitted to the address listed in Section C - General

Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) To ensure compliance with Conditions D.3.10 and D.3.11, test results along with the amount of coal burned shall be submitted quarterly. Oil analysis may be based on the suppliers invoice and shall be submitted quarterly.

(e) A quarterly summary of the information to document compliance with Condition D.3.1(b)(4) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(d) Feed Products Storage and Loadout Area, consisting of:

(1) One (1) Corn Cleanings Bin, identified as Unit ID LA-22, constructed in 1977, with a baghouse for control, exhausting to stack 3.

(2) One (1) Gluten Conveyor to Storage/Loadout, identified as Unit ID LA-21, constructed in 1977, with a baghouse for control, exhausting to stack 10.

(3) One (1) Cooled Germ Conveyor to Storage Bin, identified as Unit ID LA-18, constructed in 1977, with a baghouse for control, exhausting to stack 11.

(4) One (1) Gluten Loadout, identified as Unit ID LA-21B, constructed in 2004, with a baghouse for control, exhausting to stack 9.

(5) One (1) Pellet Cooler #1, identified as Unit ID LA-79, constructed in 2004, with a cyclone (not integral) for control, exhausting to stack 58.

(6) One (1) Combo Pellet Cooler, identified as Unit ID LA-63, constructed in 1995, a cyclone (not integral) for control, exhausting to stack 42.

(7) One (1) Pellet Cooler #4, identified as Unit ID LA-80, constructed in 2004, with an cyclone (not integral) for control, exhausting to stack 59.

(8) One (1) Pellet Cooler #5, identified as Unit ID LA-81, constructed in 2004, with an cyclone (not integral) for control, exhausting to stack 60.

(9) One (1) Pellet Storage Bin, identified as Unit ID LA-64, constructed in 1995, with a integral baghouse for control, exhausting to stack 43.

(10) One (1) Hammermill Aspiration Process, identified as Unit ID LA-77, constructed in 2000, with a scrubber for control, exhausting to stack 54.

(11) One (1) Feed Dump Aspiration System, identified as Unit ID LA-83, constructed in 2004, with a baghouse for control, exhausting to stack 62.

(12) One (1) blond Pellet Bin, identified as Unit ID LA-82, constructed in 2004, with two baghouses for control, exhausting to stack 61.

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

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

D.4.1 Prevention of Significant Deterioration [326 IAC 2-2]

(a) Pursuant to PSD 79-1551, issued August 31, 1984, the PM emissions from LA-22 shall be controlled by baghouses that provide an overall control efficiency of at least 99.9%. Compliance with these limitations will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration).

(b) Pursuant to OP 79-07-89-0345, issued February 5, 1986:

(1) The PM emissions from LA-18 shall not exceed 0.26 pounds per hour and 1.1 tons per year; and

(2) The PM emissions from LA-22 shall not exceed 0.12 pounds per hour and 0.5 tons per year.

Compliance with these limitations will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration).

(c) Pursuant to CP 157-3581-00033, issued February 27, 1995 and amended April 5, 1995, the PM/PM10 emissions from LA-21 shall not exceed 1.03 pounds per hour. Compliance with this limit is equivalent to PM/PM10 emissions of less than or equal to 4.5 tons per year.

Compliance with these limitations shall render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable for PM and PM10.

(d) Pursuant to SSM 157-16882-00033, issued December 5, 2003, and as revised by this permit:

(1) The PM/PM10 emissions shall not exceed the limits listed in the table below:

Unit ID	PM/PM10 emission limit (lb/hr)	PM/PM10 emission limit (ton/yr)
LA-21B	0.26	1.13
LA-63	3.00	13.1
LA-64	1.29	5.65
LA-77	0.77	3.38
LA-79	1.71	7.48
LA-80	1.71	7.48
LA-81	1.71	7.48
LA-82	8.26	1.13
LA-83	1.03	4.51

(2) The Permittee shall shut down units LA-19, LA-20, LA-23, LA-24, LA-49, and LA-59.

Compliance with these limitations shall render the requirements of 326 IAC 2-2 not applicable for PM and PM10.

D.4.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from facilities LA-22, LA-21, LA-18, LA-63, LA-64, LA-77, LA-21B, LA-79, LA-80, LA-81, LA-82, LA-83 shall not exceed the pound per hour emission rate established as E in the following formula:

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:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and

P = process weight rate in tons per hour

Or depending on the process weight rate:

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

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

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughputs of the respective facilities is treated as confidential until a determination has been made.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.4.4 Particulate Control

In order to comply with Conditions D.4.1 and D.4.2,

(a) The baghouses for particulate control, including those integral to the process, shall be in operation and control emissions from LA-22, LA-21, LA-18, LA-64, LA-21B, LA-82 and LA-83 at all times those facilities are in operation.

(b) The cyclones for particulate control, including those integral to the process, shall be in operation and control emissions from LA-79, LA-80, LA-81, and LA-63 at all times those facilities are in operation.

(c) The scrubber for particulate control shall be in operation and control emissions from LA-77 at all times the facility is in operation.

D.4.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Pursuant to SSM 157-16882-00033, issued December 5, 2003, and SSM 157-11449-00033, issued August 16, 2000, within 60 days of achieving maximum production rate, but no later than 180 days after the initial startup of LA-63, the Permittee shall perform PM testing for LA-63 utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing.

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

D.4.6 Visible Emissions Notations

(a) Visible emission notations of the stack exhaust from LA-22, LA-21, LA-18, LA-21B, LA-63, LA-64, LA-79, LA-80, LA-81, LA-82 and LA-83 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) Visible emission notations of the stack exhaust from LA-77 shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(c) 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.

(d) 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.

(e) 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.

(f) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.4.7 Parametric Monitoring

(a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with LA-22, LA-21, LA-18, LA-82 and LA-64, at least once per day when these facilities are in operation. When for any one reading or observance, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.4.8 Baghouse and Cyclone Inspections

(a) An inspection of all bags, controlling particulate emissions from facilities LA-22, LA-21, LA-18, LA-64, LA-21B, LA-82 and LA-83 shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

(b) An inspection shall be performed at least once per calendar year for all cyclones controlling pellet coolers (LA-63, LA-79, LA-80, and LA-81). Inspections required by this condition shall be performed t least six (6) months apart.

(b) Inspections shall also be performed whenever the respective baghouse or cyclone is out of service for more than 24 consecutive hours. All defective bags shall be replaced.

D.4.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it has been 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.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have 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).

D.4.10 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. 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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.4.11 Scrubber Monitoring

(a) The Permittee shall monitor and record the scrubbing liquid rate from the scrubber controlling emissions from LA-77, at least once per hour, when the respective facility is in operation. The flow rate shall not average less than 25 gallons based on twelve (12) consecutive one-hour readings recorded during each shift.

(b) When for any one reading, the flow rate is less than the normal range of 25 gallons per minute, or a minimum rate established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading or flow rate that is outside the above mentioned ranges, is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.

(c) The instrument used for determining the flow rate shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.4.12 Scrubber Inspections

An inspection of the scrubber controlling emissions from facility LA-77 shall be performed each calendar quarter. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.

D.4.13 Scrubber Failure Detection

In the event that a scrubber malfunction has been observed:

Failed units and the associated process will be shut down immediately until the failed units have 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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.4.14 Record Keeping Requirements

(a) To document compliance with Condition D.4.6(a), the Permittee shall maintain records of the once per day visible emission notations of the stack exhaust.

(b) To document compliance with Condition D.4.6(b), the Permittee shall maintain records of the once per shift visible emission notations of the stack exhaust.

(c) To document compliance with Condition D.4.7, the Permittee shall maintain records of the of the once per day pressure drop readings.

(d) To document compliance with Conditions D.4.8 and D.4.12, the Permittee shall maintain records of the results of the inspections.

(e) To document compliance with Condition D.4.11, the Permittee shall maintain once per shift flow rate records of the scrubber controlling emissions from LA-77:

(f) To document compliance with Condition D.4.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

(g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(e) Refinery Area, consisting of:

(1) One (1) Mud Centrifuges Vent #1, identified as Unit ID LA-72, constructed in 1977, with no emission control device, exhausting to stack 46.

(2) One (1) Mud Centrifuges Vent #2, identified as Unit ID LA-73, constructed in 1977, with no emission control device, exhausting to stack 47.

(3) One (1) Mud Centrifuges Vent #3, identified as Unit ID LA-74, constructed in 1977, with no emission control device, exhausting to stack 53.

(4) One (1) Jets Foam Trap, identified as Unit ID LA-75, constructed in 1977, with no emission control device, exhausting to stack 48.

(5) One (1) Soda Ash Unloading and Storage, identified as Unit ID LA-29, constructed in 1977, with a scrubber for control, exhausting to stack 19.

(6) Two (2) Hydrochloric Acid Storage Tanks, identified as Unit ID LA-41, constructed in 1977, with a scrubber for control, exhausting to stack 32.

(7) One (1) Hydrochloric Acid Supply Head Tank, identified as Unit ID LA-76, constructed in 1977, with a scrubber for control, exhausting to stack 50.

(8) One (1) Cation IX Drain Tank, identified as Unit ID LA-65A, constructed in 1977, with a scrubber for control, exhausting to stack 51.

(9) One (1) Filter Aid Truck Unloading to West Storage Bin, identified as Unit ID LA-31, constructed in 1977, with a baghouse for control, exhausting to stack 20A.

(10) One (1) Filter Aid Truck Unloading to East Storage Bin, identified as Unit ID LA-31, constructed in 1977, with a baghouse for control, exhausting to stack 20B.

(11) One (1) Filter Aid Transfer from Storage Bins to Weighing Hopper, identified as Unit ID LA-32, constructed in 1993, with a baghouse for control, exhausting to stack 21.

(12) One (1) MBS Aspiration System, identified as Unit ID LA-61, constructed in 1995, with a scrubber for control, exhausting to stack 49.

(13) One (1) natural gas/No. 2 fuel oil fired Carbon Reactivation Furnace, identified as Unit ID LA-28, constructed in 1977, with a maximum heat input of 22 MMBtu/hr, with a scrubber for control, exhausting to stack 33.

(14) One (1) Krystar Dryer/Cooler, identified as Unit ID LA-51, constructed in 1987, with emissions controlled by two integral cyclones/product collectors (53L605) and a wet scrubber (53L606), exhausting to stack 35.

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

D.5.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2] [40 CFR 52.21]

(a) Pursuant to OP 79-07-89-0345, issued February 5, 1986:

(1) The total particulate emissions from LA-31 shall not exceed 0.05 pounds per hour and 0.2 tons per year.

(2) The particulate emissions from LA-32 shall not exceed 0.03 pounds per hour and 0.1 tons per year.

(3) The sulfur dioxide emissions from LA-28 shall not exceed 10.4 pounds per hour and 45.6 tons per year.

Compliance with these limitations will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration).

Compliance with these limits will satisfy the requirements of 40 CFR 52.21, 326 IAC 2-2, and

(b) Pursuant to CP 157-3581-00033, issued February 27, 1995, and amended May 6, 1996:

(1) The PM/PM10 emissions from LA-28 shall not exceed 1.29 pounds per hour. Compliance with this limit is equivalent to PM/PM10 emissions of 5.63 tons per year.

(2) The sulfur dioxide emissions from LA-61 shall not exceed 5.96 pounds per hour and the concentration sulfur dioxide in the exhaust shall not exceed 500 ppm. Compliance with this limit is equivalent to sulfur dioxide emissions of less than 26.1 tons per year.

Compliance with these limitations shall render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable for PM, PM10 and SO_2.

(c) Pursuant to SSM 157-11449-00033, issued August 16, 2000:

(1) The amount of steam vented under the alternate operating scenario from LA-75 shall not exceed 21,000,000 pounds per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit is equivalent to an increase in sulfur dioxide (SO_2) emissions of less than 40 tons per year.

Compliance with these limitations shall render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable for SO_2.

(d) Pursuant to CP 157-3581-00033, issued February 27, 1995 and amended April 5, 1995, and SSM 157-16770-00033, issued July 10, 2003, the PM/PM10 emissions from LA-51 shall not exceed 0.77 pounds per hour. Compliance with this limit is equivalent to PM/PM10 emissions of less than or equal 3.38 tons per year, will ensure compliance with 326 IAC 6-3-2, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable for PM and PM10.

(e) The particulate emissions from LA-29 shall not exceed 0.11 pounds per hour and 0.5 tons per year.

Compliance with these limitations shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.5.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from facilities LA-29, LA-31(stack 20A), LA-31(stack 20B), LA-32, LA-28 and LA-51 shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

Or depending on the process weight rate:

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

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

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughputs of the respective facilities is treated as confidential until a determination has been made.

D.5.3 Sulfur Dioxide [326 IAC 7-1.1-2] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1-2(a)(3), the sulfur dioxide emissions from LA-28 shall not exceed 0.5 pounds per MMBtu heat input when combusting #2 fuel oil. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calender month average.

D.5.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.5.5 Particulate and Sulfur Dioxide Control

In order to comply with Condition D.5.2,

(a) The baghouses for particulate control shall be in operation and control emissions from LA-31(stack 20A), LA-31(stack 20B), LA-32 at all times that the respective facilities are in operation.

(b) The scrubbers for particulate control shall be in operation and control emissions from LA-28, LA-29 and LA-51 at all times that the respective facilities are in operation.

(c) The cyclone, determined to be integral to the process, for particulate control shall be in operation and control emissions from LA-51 at all times that the facility is in operation.

(d) The scrubber for sulfur dioxide control shall be in operation and control emissions from LA-61 at all times that the facility is in operation.

D.5.6 Sulfur Dioxide Emissions and Sulfur Content

Compliance with Condition D.5.3 shall be determined pursuant to 326 IAC 3-7-4. The Permittee shall demonstrate that the sulfur dioxide emissions from LA-28 do not exceed five-tenths (0.5) pound per million Btu heat input when combusting #2 fuel oil by:

(a) Providing vendor analysis of fuel delivered (including Btu per gallon and percent sulfur), if accompanied by a vendor certification, or;

(b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

A determination of noncompliance pursuant to the method specified above shall not be refuted by evidence of compliance pursuant to the other method.

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

D.5.7 Visible Emissions Notations

(a) Visible emission notations of LA-29, LA-28 and LA-51 stack exhaust shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) Visible emission notations of LA-31(stack 20A), LA-31(stack 20B), and LA-32 stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.5.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used to control emissions from LA-31(stack 20A), LA-31(stack 20B), and LA-32, at least once per day when the facilities are in operation. When for any one reading or observance, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.5.9 Baghouse Inspections

(a) An inspection of all bags, controlling particulate emissions from facilities LA-31(stack 20A), LA-31(stack 20B), and LA-32, shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

(b) Inspections shall also be performed whenever the respective baghouse is out of service for more than 24 consecutive hours. However, an inspection is not required if one has been conducted within the previous two months. All defective bags shall be replaced.

D.5.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it has been 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.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have 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).

D.5.11 Scrubber Monitoring

(a) The Permittee shall monitor the pH of the scrubbing liquid and scrubber recirculation rate at least once per shift of the scrubber controlling emissions from LA-61 during normal operation. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when the pH or flow rate readings are outside of the respective normal ranges, as specified by the manufacturer, for any one reading. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.

(b) The Permittee shall monitor the scrubber recirculation rate at least once per shift of the scrubbers controlling emissions from LA-28 and LA-29 during normal operation. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when the flow rate readings are outside of the respective normal ranges, as specified by the manufacturer, for any one reading. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.

(c) The Permittee shall monitor the scrubbant flow rate at least once per hour of the scrubber controlling emissions from LA-51. The Permittee shall also average the previous twelve readings of the scrubbant flow rate once per shift. If the average scrubbant flow rate (based on twelve, one-hour readings) is less than 100 gallons per minute, the Permittee shall take reasonable response steps in accordance with Section

C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. An average scrubbant flow rate (based on twelve, one-hour readings) that is less than 100 gallons per minute is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.

(d) The instruments used for determining the pH, flow rate, and pressure drop shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.5.12 Scrubber Inspections

An inspection of the scrubbers controlling emissions from facilities LA-28, LA-29, LA-51 and LA-61 shall be performed semi-annually. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.

D.5.13 Scrubber Malfunction

In the event that a scrubber malfunction has been observed:

Failed units and the associated process will be shut down immediately until the failed units have 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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.5.14 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. 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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.5.15 Record Keeping Requirements

(a) To document compliance with Condition D.5.1, the Permittee shall maintain records of the total pounds of steam vented per calender month.

(b) To document compliance with Condition D.5.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the sulfur dioxide emission limit established in Condition D.5.3.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used;

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications;

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

(c) To document compliance with Condition D.5.7, the Permittee shall maintain records of the once per shift visible emission notations of the stack exhaust from LA-29, LA-28 and LA-51.

(d) To document compliance with Condition D.5.7, the Permittee shall maintain records of the once per day visible emission notations of the stack exhaust from LA-31(stack 20A), LA-31(stack 20B), and LA-32.

(e) To document compliance with Condition D.5.8, the Permittee shall maintain records of the once per day pressure drop readings.

(f) To document compliance with Conditions D.5.9 and D.5.12, the Permittee shall maintain records of the results of the inspections.

(g) To document compliance with Condition D.5.11, the Permittee shall maintain:

(1) Once per shift records of the scrubbing liquid pH and scrubber recirculation rate of the scrubber controlling emissions from LA-61.

(2) Once per shift records of the scrubber recirculation rate of the scrubbers controlling emissions from LA-28 and LA-29.

(3) Hourly scrubbant flow rate readings of the scrubber controlling emissions from LA-51.

(4) Once per shift average scrubbant flow rate of the scrubber controlling emissions from LA-51 based on twelve one-hour readings.

(h) To document compliance with Condition D.5.4, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

(i) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.16 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.5.1(c) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) A certification, signed by the responsible official, shall be submitted, that certifies all of the fuels combusted during the twelve month period.

(c) The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the

end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas-fired boiler certification submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) A semi-annual summary of the information to document compliance with Condition D.5.3 in any compliance period when No. 2 fuel oil was combusted, and the natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(f) Coal and Ash Storage and Handling Area, consisting of:

(1) One (1) Coal Unloading Building Aspiration System, identified as Unit ID LA-33, constructed in 1977, with a baghouse for control, exhausting to stack 22.

(2) One (1) Crusher and Transfer Building Aspiration System, identified as Unit ID LA-34, constructed in 1977, with a baghouse for control, exhausting to stack 23.

(3) One (1) Coal Storage Silos Top Aspiration System, identified as Unit ID LA–35, constructed in 1977, with a baghouse for control, exhausting to stack 24.

(4) One (1) Coal Storage Silos Bottom Aspiration System, identified as Unit ID LA-36, constructed in 1977, with a baghouse for control, exhausting to stack 25.

(5) One (1) Utility Building Aspiration System #1, identified as Unit ID LA-37, constructed in 1977, with a baghouse for control, exhausting to stack 26.

(6) One (1) Utility Building Aspiration System #2, identified as Unit ID LA-38, constructed in 1977, with a baghouse for control, exhausting to stack 27.

(7) One (1) Coal Silo Aspiration System, identified as Unit ID LA-55, constructed in 1977, with a rotoclone for control, exhausting to stack 28.

(8) One (1) Coal Bunkers Aspiration, identified as Unit ID LA-56, constructed in 1977, with a rotoclone for control, exhausting to stack 29.

(9) One (1) Ash Transfer Aspiration Vacuum Blower #1, identified as Unit ID LA-42A, constructed in 1977, with a baghouse for control, exhausting to stack 30A.

(10) One (1) Ash Transfer Aspiration Vacuum Blower #2, identified as Unit ID LA-42A, constructed in 1977, with a baghouse for control, exhausting to stack 30B.

(11) One (1) Ash Silo Aspiration Air East Vent, identified as Unit ID LA-42B, constructed in 1977, with a dampered vent, exhausting to stack 31A.

(12) One (1) Ash Silo Aspiration Air West Vent, identified as Unit ID LA-42B, constructed in 1977, with a dampered vent, exhausting to stack 31B.

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

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

D.6.1 Prevention of Significant Deterioration [326 IAC 2-2] [40 CFR 52.21]

Pursuant to OP 79-07-89-0345, issued February 5, 1986:

(a) The particulate emissions from LA-33 shall not exceed 1.77 pounds per hour and 7.8 tons per year.

(b) The particulate emissions from LA-34 shall not exceed 0.69 pounds per hour and 3.0 tons per year.

(c) The particulate emissions from LA-35 shall not exceed 0.51 pounds per hour and 2.2 tons per year.

(d) The particulate emissions from LA-36 shall not exceed 0.84 pounds per hour and 3.7 tons per year.

(e) The particulate emissions from LA-37 shall not exceed 0.10 pounds per hour and 0.44 tons per year.

(f) The particulate emissions from LA-38 shall not exceed 0.10 pounds per hour and 0.44 tons per year.

(g) The total particulate emissions from LA-42A shall not exceed 0.33 pounds per hour and 1.4 tons per year.

(h) The total particulate emissions from LA-42B shall not exceed 0.9 pounds per hour and 3.9 tons per year.

Compliance with these limitations will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration).

D.6.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from facilities LA-33, LA-34, LA-35, LA-36, LA-37, LA-38, LA-55, LA-56, LA-42A (stack 30A), LA-42A (stack 30B), LA-42B (stack 31A) and LA-42B (stack 31B) shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

Or depending on the process weight rate:

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

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

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughputs of the respective facilities is treated as confidential until a determination has been made.

D.6.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.6.4 Particulate Control

In order to comply with Conditions D.6.1 and D.6.2,

(a) The baghouses for particulate control shall be in operation and control emissions from LA-33, LA-34, LA-35, LA-36, LA-37, LA-38, LA-42A (stack 30A) and LA-42A (stack 30B) at all times that the facilities are in operation.

(b) The rotoclones for particulate control shall be in operation and control emissions from LA-55 and LA-56 at all times that the facilities are in operation.

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

D.6.5 Visible Emissions Notations

(a) Visible emission notations of the stack exhaust from LA-55, LA-56, LA-42A (stack 30A), LA-42A (stack 30B), LA-42B (stack 31A) and LA-42B (stack 31B) shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) Visible emission notations of the stack exhaust from LA-33, LA-34, LA-35, LA-36, LA-37, and LA-38 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(c) 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.

(d) 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.

(e) 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.

(f) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.6.6 Parametric Monitoring

(a) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with LA-42A (stack 30A) and LA-42A (stack 30B) at least once per shift when the facilities are in operation. When for any one reading or observance, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(b) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with LA-33, LA-34, LA-35, LA-36, LA-37, and LA-38 at least once per day when the facilities are in operation. When for any one reading or observance, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(c) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.6.7 Baghouse Inspections

(a) An external inspection of all bags, controlling particulate emissions from facilities LA-42A (stack 30A) and LA-42A (stack 30B), shall be performed at least once per calendar quarter. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

(b) An internal inspection of all bags, controlling particulate emissions from facilities LA-42A (stack 30A), LA-42A (stack 30B)**,** LA-33, LA-34, LA-35, LA-36, LA-37, and LA-38, shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

(c) Inspections shall also be performed whenever the respective baghouse is out of service for more than 24 consecutive hours. However, an inspection is not required if one has been conducted within the previous two months. All defective bags shall be replaced.

D.6.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it has been 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.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have 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).

D.6.9 Rotoclone Inspections

An inspection shall be performed at least annually of all rotocyclones controlling LA-55 and LA-56. Inspections required by this condition shall not be performed in consecutive months.

D.6.10 Rotoclone Failure Detection

In the event that rotoclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have 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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.6.11 Record Keeping Requirements

(a) To document compliance with Condition D.6.5, the Permittee shall maintain records of the once per shift visible emission notations from LA-42A (stack 30A) and LA-42A (stack 30B), LA-42B (stack 31A) and LA-42B (stack 31B).

(b) To document compliance with Condition D.6.5, the Permittee shall maintain records of the once per day visible emission notations from LA-33, LA-34, LA-35, LA-36, LA-37, and LA-38.

(c) To document compliance with Condition D.6.6, the Permittee shall maintain records of the total static pressure drop readings during normal operation.

(d) To document compliance with Conditions D.6.7 and D.6.9, the Permittee shall maintain records of the results of the inspections.

(e) To document compliance with Condition D.6.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

(f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Specifically Regulated Insignificant Activities

(a) Coal bunker and coal scale exhausts and associated dust collector vents [326 IAC 6-3-2].

(b) Vents from ash transport systems not operated at positive pressure [326 IAC 6-3-2].

(c) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

(d) Structural steel and bridge fabrication activities using 80 tons or less of welding consumables. [326 IAC 6-3-2]

(e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

(f) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO2; 5 lb/hr or 25 lb/day NOx; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

(1) Germ Day Bin, exhausting to stack 61. [326 IAC 6-3-2]

(2) Starch/Gluten Loadout, exhausting to stack 8. [326 IAC 6-3-2]

(3) Salt Storage Tank, exhausting to stack 12. [326 IAC 6-3-2]

(4) Soda Ash Head Tank, exhausting to stack 52. [326 IAC 6-3-2]

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

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

D.7.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the insignificant activities listed in this section shall be limited using the following equation:

Those activities with a process weight rate of less than 100 pounds per hour shall be limited to 0.551 pounds per hour;

Or depending on the process weight rate:

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

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: A.E. Staley Manufacturing Company
Source Address: 3300 U.S. 52 South, Lafayette, Indiana, 47905
Mailing Address: 3300 U.S. 52 South, Lafayette, Indiana, 47905
Part 70 Permit No.: T157-6008-00033

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

Please check what document is being certified:

Annual Compliance Certification Letter

Test Result (specify) _____

Report (specify) _____

Notification (specify) _____

Affidavit (specify) _____

Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: A.E. Staley Manufacturing Company
Source Address: 3300 U.S. 52 South, Lafayette, Indiana, 47905
Mailing Address: 3300 U.S. 52 South, Lafayette, Indiana, 47905
Part 70 Permit No.: T157-6008-00033

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

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

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: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: A.E. Staley Manufacturing Company
Source Address: 3300 U.S. 52 South, Lafayette, Indiana, 47905
Mailing Address: 3300 U.S. 52 South, Lafayette, Indiana, 47905
Part 70 Permit No.: T157-6008-00033

Natural Gas Only Alternate Fuel burned From:_____ To:_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Signature:
Printed Name:
Title/Position:
Phone:
Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

Part 70 Quarterly Report

Source Name: A.E. Staley Manufacturing Company
Source Address: 3300 U.S. 52 South, Lafayette, Indiana, 47905
Mailing Address: 3300 U.S. 52 South, Lafayette, Indiana, 47905
Part 70 Permit No.: T157-6008-00033
Facility: LA-15
Parameter: Amount of fuel oil consumed (gallons per 12 consecutive month period)
Limit: 1,662,480 gallons per 12 consecutive month period with compliance determined for the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

Part 70 Quarterly Report

Source Name: A.E. Staley Manufacturing Company
Source Address: 3300 U.S. 52 South, Lafayette, Indiana, 47905
Mailing Address: 3300 U.S. 52 South, Lafayette, Indiana, 47905
Part 70 Permit No.: T157-6008-00033
Facility: LA-75
Parameter: Amount of steam vented (pounds per 12 consecutive month period)
Limit: 21,000,000 pounds per 12 consecutive month period with compliance determined for the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: A.E. Staley Manufacturing Company
Source Address: 3300 U.S. 52 South, Lafayette, Indiana, 47905
Mailing Address: 3300 U.S. 52 South, Lafayette, Indiana, 47905
Part 70 Permit No.: T157-6008-00033
Facility: LA-8, LA-17A, LA-15, LA-46, LA-47 and LA-28.
Parameter: Sulfur dioxide emissions
Limit: 0.5 pounds per MMBtu of heat input

Month: _____ **Year:** _____

Month	Sulfur Content (%)	Heat Content	Fuel usage (gal/month)	SO_2 Emissions (lb/MMBTU)

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: A.E. Staley Manufacturing Company
Source Address: 3300 U.S. 52 South, Lafayette, Indiana, 47905
Mailing Address: 3300 U.S. 52 South, Lafayette, Indiana, 47905
Part 70 Permit No.: T157-6008-00033
Facility: LA-45
Parameter: Sulfur dioxide emissions (pounds per MMBtu of heat input)
Limit: 6.0 pounds per MMBtu of heat input

Month: _____ **Year:** _____

Month	Sulfur Content (%)	Heat Content	Fuel usage (gal/month)	SO_2 Emissions (lb/MMBTU)

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: A.E. Staley Manufacturing Company
Source Address: 3300 U.S. 52 South, Lafayette, Indiana, 47905
Mailing Address: 3300 U.S. 52 South, Lafayette, Indiana, 47905
Part 70 Permit No.: T157-6008-00033

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do 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:	

Page 2 of 2

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: ______________________________

Attach a signed certification to complete this report.

issued June 28, 2004

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for Part 70 Permit

Source Background and Description

Source Name:	A.E. Staley Manufacturing Company
Source Location:	3300 U.S. 52 South, Lafayette, Indiana, 47905
County:	Tippecanoe
SIC Code:	2046
Operation Permit No.:	T157-6008-00033
Permit Reviewer:	ERG/BS

On January 4, 2004, the Office of Air Quality (OAQ) had a notice published in the Journal & Courier in Lafayette, Indiana, stating that A.E. Staley Manufacturing Company had applied for a Part 70 Permit relating to the operation of a stationary corn wet milling plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On February 16, 2002, A.E. Staley Manufacturing Company ("AE Staley") submitted comments on the proposed Part 70 Permit. The summary of the comments is as follows. Text with a line through it has been deleted and bold text has been added. The Table of Contents has been updated as necessary.

Comment 1:

The middle paragraph of the Title Page should either be deleted or clarified that it is descriptive information and does not constitute enforceable conditions. AE Staley recommends that the text on the cover page of the permit be annotated with the following statement. Otherwise, there could be confusion as to whether AE Staley is required to annually certify compliance with the cover page.

The preceding paragraph does not constitute enforceable conditions for which a compliance certification is required.

Response to Comment 1:

Although IDEM, OAQ agrees that the information included on the front cover of the permit does not require compliance certification, IDEM, OAQ has not added the statement proposed by AE Staley. IDEM, OAQ believes this sentence is unnecessary because it is obvious from the language used on the front cover that it is for informational purposes only and does not include any specific conditions that would require compliance certification.

No change was made to the permit as a result of this comment.

Comment 2:

AE Staley requests that the first paragraph in Section A.2 (Emission Units and Pollution Control Equipment Summary) be modified to remove all references to litigation since there is no pending

litigation regarding a confidentiality determination for this permit. AE Staley requests that this paragraph be modified to read as follows:

This stationary source consists of the following emission units and pollution control devices: (Note that the maximum process capacities of these units have been included in an OAQ file that is being treated as confidential until a determination has been made.

Response to Comment 2:

The following changes were made as a result of this comment:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices: (Note that the maximum process capacities of these units have been included in an OAQ file that is being treated as confidential until a determination has been made ~~and all litigation has been resolved~~):

Comment 3:

AE Staley requests that the construction date be changed from 1995 to 1991 for the unit identified in A.2(c)(9). CP 157-1912-00033 was issued on November 11, 1990 for the Germ RST Finish Dryer No. 3 (LA-53) and the unit was constructed in early 1991. The same correction should be made in Section D.3(c)(9).

Response to Comment 3:

The following changes were made as a result of this comment.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

...

(c) Feed House and Boiler House Area, consisting of:

...

(9) One (1) Germ RST Finish Dryer No.3, identified as Unit ID LA-53, constructed in ~~1995~~ **1991**, with a cyclone (not integral) for control, exhausting to stack 7.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

...

(c) Feed House and Boiler House Area, consisting of:

...

(9) One (1) Germ RST Finish Dryer No.3, identified as Unit ID LA-53, constructed in ~~1995~~ **1991**, with a cyclone (not integral) for control, exhausting to stack 7.

...

Comment 4:

AE Staley requests that the misspelled word 'tack' be changed to "stack" in Condition A.2(e)(8). AE Staley also requests that the construction date be changed from 1995 to 1987 in item (14). The Krystar/Cooler (LA-51) was first permitted via PC (79) 1617, issued August 25, 1986, and was constructed in 1987.

Response to Comment 4:

The following changes were made as a result of this comment.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

...

(e) Refinery Area, consisting of:

...

(8) One (1) Cation IX Drain Tank, identified as Unit ID LA-65A, constructed in 1977, with a scrubber for control, exhausting to ~~tack~~ **stack** 51.

...

(14) One (1) Krystar Dryer/Cooler, identified as Unit ID LA-51, constructed in ~~1995~~ **1987**, with emissions controlled by two integral cyclones/product collectors (53L605) and a wet scrubber (53L606), exhausting to stack 35.

Comment 5:

There are a number of specifically regulated insignificant activities listed in the Technical Support Document (TSD) that are not listed in the permit. AE Staley would like to note that its specifically regulated insignificant activities are not limited to the list contained in Section A.3.

Response to Comment 5:

The insignificant activities listed in the TSD stem from the information provided by AE Staley in the Part 70 permit application. Likewise, the specifically regulated insignificant activities listed in the TSD and permit also stem from the information provided in the permit application. If AE Staley believes that the list of specifically regulated insignificant activities is incomplete, it should provide a revised list to the IDEM, OAQ so this permit can be revised appropriately.

No changes were made as a result of this comment.

Comment 6:

Compliance requirements, including inspection and entry requirements, for Part 70 permits are defined by USEPA at 40 CFR 70.6(c) where it states that *"All part 70 permits shall contain the following elements with respect to compliance."* The phrase *"at reasonable times"* is not included in Sections B.21(b)-(d) even though it is included in 40 CFR 70.6(c)(2)(ii)-(iv). AE Staley requests that Sections B.21(b)-(d) be modified to include the phrase "at reasonable times" in order to be consistent with federal Part 70 permit regulations. The inclusion of this phrase is necessary because key facility personnel may not be immediately available at all times, including nights,

weekends, and holidays, to assist the Agency with inspections, copying of records, or sampling allowed under the authority of this Part 70 permit.

Response to Comment 6:

The corresponding provision of the state rule - 326 IAC 2-7-6(2) - does not specifically limit inspection and entry to "reasonable times." The IDEM, OAQ acknowledges that case law applies a general standard of reasonableness to many actions taken by a regulatory agency, but that does not require that the permit be written differently than the plain language of the applicable rule.

No changes were made to the permit as a result of this comment.

Comment 7:

There is no current litigation regarding confidentiality determinations for this permit. AE Staley requests the removal of all references to litigation in Conditions D.1.2, D.3.2, D.4.2, D.5.2 and D.6.2 and requests that the respective language be modified as follows:

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughputs of the respective facilities are being treated as confidential until a determination has been made.

Response to Comment 7:

The following changes were made in response to this comment:

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

~~D.3.2~~**D.3.3** Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

D.4.2 Particulate **Emission Limitations for Manufacturing Processes** [326 IAC 6-3-2]

D.5.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

D.6.2 Particulate **Emission Limitations for Manufacturing Processes** [326 IAC 6-3-2]

...

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

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

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughput of the respective facilities is ~~being~~ treated as confidential until a determination ~~is~~ **has been** made**.** ~~and all litigation has been resolved.~~

Comment 8:

AE Staley requests that Conditions D.1.6, D.4.7, D.4.14(c), D.4.14(e)(1), D.5.8, D.5.15(e), D.6.6, and D.6.11(c) (Parametric Monitoring) relating to parametric monitoring be removed from this permit. Parametric monitoring for bagfilters using total static pressure drop is not acceptable to AE Staley.

The challenges and efficacy of monitoring bagfilter pressure drop for emission sources at the South Plant facility has arisen previously. Similar conditions have been deleted in previous draft and final permits issued to AE Staley. Beyond the fact previously stated that bagfilters used in feed production systems are integral process equipment, AE Staley remains opposed to either periodic or continuous monitoring of static pressure drop for product collectors and bin vents for several technical reasons. It should be noted that other States (e.g., Arkansas, Illinois, and Tennessee) in which AE Staley operates have agreed with the following arguments regarding pressure drop monitoring and have not proposed or imposed this type of condition in Title V permits.

It is common practice in our industry to use baghouses for the pneumatic conveying of a product. For this reason, the inlet grain loading of the unit is very high when compared to a baghouse operated solely for pollution control purposes. It has been AE Staley's experience that if static pressure drop gauges are installed on bagfilters that have very high inlet loadings, the taps to the gauges may plug with product making the instruments unavailable for monitoring purposes until the lines are cleaned out. This is especially true for baghouses controlling high humidity air streams located outdoors where the upstream lines to the gauges are susceptible to condensation of moisture. In addition, many of the baghouses at the facility are located outdoors far above ground level elevations in locations that are not easily accessible. In order to perform pressure drop readings, an employee would have to access these locations at least twice per day in some circumstances according to the draft permit. It will take longer for an employee to perform pressure drop readings than to perform visible emissions evaluations of each bagfilter. Each measurement is expected to take an average of ten minutes since, in almost all cases, the employee will have to climb several flights of steps or ladders to get a pressure gauge reading. Although labor costs are a concern for these inspections, AE Staley is even more concerned about the safety of its employees especially during conditions of extreme weather.

Baghouse pressure drop is a function of air to cloth ratio, bag material, cake thickness, inlet loading and cleaning frequency plus the characteristics (e.g., "stickiness") of the product being conveyed and controlled. The air to cloth ratio, bag material and cleaning frequency are fixed, however the dryer operates at different rates and dries different products which will in turn have different effects on the filter cake thickness as feed materials are conveyed through the system. For this reason, the pressure drop range can vary dramatically depending on the rate of the dryer and the type of material being dried. The combination of these variables makes the correlation of acceptable pressure drop ranges to compliance with emission limits difficult. AE Staley strongly believes the pressure drop range is not an effective means of monitoring the operational efficiency of a baghouse. It is very possible a baghouse could be operating outside the specified pressure drop range and still be in full compliance with the allowable emission limit.

Conversely, because most emission problems are caused by torn, damaged or improperly installed bag(s), it is very likely that a baghouse could be operating within the specified pressure drop range and not be in full compliance with the allowable emission limit. In most excess emission situations, only a few bags in a baghouse become damaged. Therefore, the change in the bagfilter static pressure drop is negligible. Thus, the emission source could exceed emission limitations, but the bagfilter static pressure drop would not indicate this condition and would be within the prescribed pressure drop range. AE Staley has determined this method of compliance monitoring for bagfilters in use at the South Plant facility is not suited for the goal intended and will yield erroneous conclusions regarding compliance status of the emission source. Instead, AE Staley believes visual monitoring is the most suitable means to determine compliance while introducing the least potential for error.

Daily visual emission observations provide an accurate representation as to the operating condition of a product receiver or bin vent filter. Visual observation can quickly ascertain if a baghouse is

leaking (from a torn, damaged or improperly installed bag or cartridge). Feed is a highly visible substance making malfunctions of baghouses easily noticeable by visual inspections. Therefore, daily visible emissions notations of bagfilter units addressed in this draft permit is more than satisfactory to meet compliance monitoring requirements. AE Staley considers any increase in visible emissions from a bagfilter to be an indication of a malfunction regardless of pressure drop. In terms of demonstrating compliance for these types of sources, AE Staley believes the only acceptable way to determine if there is a problem is through visible emission inspections. Pressure drop ranges correlated to actual emission rates is in no way as reliable as direct visual examination. Thus, requirements to monitor bagfilter pressure drop are duplicative, burdensome, inconclusive and unnecessary.

The preliminary draft permit requires bagfilters to operate within a static pressure drop range of 3.0 to 6.0 inches of water or a range established during a particulate emission test. The default range of 3.0 to 6.0 inches is totally arbitrary and could not possibly apply to all bagfilters in use at this facility. This means that individual emission tests would need to be performed for each bagfilter to establish a range. Not only is such a requirement extremely expensive for the numerous bagfilters in use, it is not even a feasible manner in which to establish a proper operating range for a collector. It is impossible to simulate all possible ranges of static pressure drop for a bagfilter during an emission test. As previously stated, these units operate over a wide range of pressure drop depending on product type and production rates. These emission units will likely still be in compliance with mass emission rates even if they are being operated outside the pressure drop ranges measured during a compliance test. This requirement should be similarly deleted if the requirement to continuously monitor static pressure drop is removed from the draft permit.

The simulation of maximum and minimum pressure drops during an emission test for a single compartment bagfilter appears to present an impossible challenge and is not a good basis for establishing an acceptable static pressure drop operating range. As pressure drop across a product collector increases, product conveying rates fall eventually leading to pneumatic conveying line pluggage. In fact, if Staley were able to simulate the highest expected pressure drop range for a product collector, it is unlikely maximum production or product conveying rates could be achieved thus resulting in emission test results that will not be acceptable to IDEM. For mass emission rate results to be acceptable, the process must operate near maximum production capacity.

Response to Comment 8:

Pressure drop is an indicator of a variety of conditions within a baghouse. Monitoring of the static pressure drop across a baghouse can alert the operator to relative changes (such as dust cake resistance or bag breaks) over a period of time. The operator can use this information to chart trends and determine if the unit is operating within the optimal range as determined by baseline testing of the unit and manufacturer's specifications. Any deviations from the normal operational range of the unit, whether gradual or sudden, should alert the operator that the unit needs maintenance. Baghouse failure can occur suddenly and during any shift, so monitoring can minimize lag time in addressing control failure. Therefore, the IDEM, OAQ believes that the pressure drop readings should be taken at least once per shift. This is consistent with countless past permits issued by the IDEM, OAQ.

The Part 70 provisions of other states' State Implementation Plans and administrative codes are not identical to Indiana's. As a result, the corresponding expectations and requirements are not the same. The provisions of 326 IAC 2-7-5(3) state that Indiana's Part 70 permits must include: "Monitoring and related record keeping and reporting requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements." The IDEM, OAQ believes the requirements of AE Staley's Part 70 permit (which includes the parametric monitoring of baghouses) adequately constitute what is needed to ensure continuous compliance.

The OAQ does not agree that possible plugging of gauges is sufficient reason to justify the elimination of pressure drop readings on baghouses. Grain handling and processing industries have long been aware of dust and moisture problems in baghouse systems. Most of the companies under this classification and permitting with the OAQ are required by permit to perform pressure drop observations as well as visible emission observations. AE Staley can prevent pressure drop gauges from plugging by: (a) installing and maintaining inline filters, and (b) run pressure lines lower than the gauges (then back up to the gauges), and install a trap at the lowest point of the lines, which will have to be maintained. Other suggestions involving lines are to install the lines above piping to use gravity to pull the material down. The installation of the intake line further away from the filter may avoid excess material build up on the filters so there is no migration into the intake line. Another suggestion to consider is that the Magnehelic gauges may not be the best gauge for this particular application, and that the periodic replacement of the gauges may be a cost effective option. The single most effective suggestion the OAQ can provide is that general baghouse operation and maintenance practices should be routinely applied; including regular and frequent maintenance of the gauges.

As for the costs associated with complying with the pressure drop monitoring requirements; IDEM believes that AE Staley maintains personnel on staff which are capable of completing the required monitoring such that additional personnel would not need to be procured for the purposes of complying with the requirement to record pressure drop readings on a once per shift basis. If the associated labor costs and safety are a concern to AE Staley, then AE Staley should seriously consider relocating or replacing the gauges so that they are easily observed from easily accessible and safe locations at ground level.

The OAQ has asked AE Staley for the correct pressure drop range that indicates normal operation for the baghouses; which is often provided by the manufacturer. To date, little information has been provided by AE Staley to correct the referenced pressure drop ranges included in the permit; presumably because of AE Staley's intent to have the respective monitoring requirements removed.

No changes were made to the permit as a result of this comment.

Comment 9:

AE Staley requests that Conditions D.1.7(b), D.5.9(b), and D.6.7(c) (Baghouse Inspections) be removed from this permit for several reasons. Recent permits issued to AE Staley have never included this condition before. There is no limitation regarding the frequency for which this condition could apply. Theoretically, a facility could be required to inspect a bagfilter or cyclone several times in the same week. The logistics of performing dozens of bagfilter and cyclone inspections during unforeseen events where the whole facility or a large portion of the facility have been shutdown for more than 24 hours is staggering for this facility. AE Staley simply will not have the personnel to conduct these inspections.

Response to Comment 9:

IDEM has included a statement in D.1.7(b), D.5.9(b) and D.6.7(c) to limit inspections to once per quarter to avoid the situation presented by the Permittee.

D.1.7 Baghouse Inspections

...

(b) Inspections shall also be performed whenever the respective baghouse is out of service for more than 24 consecutive hours. **However, an inspection is not required if one has been conducted within the previous two months.** All defective bags shall be replaced.

D.5.9 Baghouse Inspections

...

(b) Inspections shall also be performed whenever the respective baghouse is out of service for more than 24 consecutive hours. **However, an inspection is not required if one has been conducted within the previous two months.** All defective bags shall be replaced.

D.6.7 Baghouse Inspections

...

(c) Inspections shall also be performed whenever the respective baghouse is out of service for more than 24 consecutive hours. **However, an inspection is not required if one has been conducted within the previous two months.** All defective bags shall be replaced.

Comment 10:

AE Staley requests that the development of response steps for any failure of a bagfilter unit not described in the Compliance Response Plan be modified from 8 business hours to 24 hours. This change would affect Conditions D.1.8(a), D.4.9(a), D.5.10(a), and D.6.8(a). The South plant facility operates twenty-four hours (twenty-four business hours) per day. If a bagfilter fails during evening hours, the necessary engineering, maintenance, and management personnel may not be available until the next morning to devise a response plan for those instances that are not described in the Compliance Response Plan. It should be noted that this condition is not applicable to the corn receiving and handling area at the South Plant facility since there are no multi-compartment bagfilters used in this process area.

Response to Comment 10:

The IDEM, OAQ believes that the Permittee has personnel available within an appropriate time frame to perform response steps if necessary. The fact that AE Staley operates 24 hours a day does not serve as a sufficient justification to allow for additional response time, especially when bag failure could result in a significant increase in emissions. For those instances that are not described in the Compliance Response Plan, the plan should include what the permittee will do when a new situation occurs, which may include a schedule for convening all necessary personnel.

No changes were made to the permit as a result of this comment.

Comment 11:

References to baghouse pressure drop readings should be deleted from Conditions D.1.8(b), D.4.9(b), D.5.10(b), and D.6.8(b) since this monitoring provision is not acceptable to AE Staley.

Response to Comment 11:

See Response to Comment 8. No changes were made to the permit as a result of this comment.

Comment 12:

AE Staley requests that Condition D.1.9(b) be removed since parametric monitoring for bagfilters using total static pressure drop is not acceptable to AE Staley.

Response to Comment 12:

See Response to Comment 8. No changes were made to the permit as a result of this comment.

Comment 13:

There is no scrubber controlling sulfur dioxide emissions from LA-62A and LA-62B in condition D.2.1(a). Condition D.2.1(a) be modified to read as follows:

The sulfur dioxide emissions from LA-62A and LA-62B shall not exceed 1.37 pounds per hour. Compliance with this limit is equivalent to sulfur dioxide emissions of less than 6.0 tons per year.

Response to Comment 13:

The following change was made as a result of this comment.

D.2.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP 157-3581-00033, issued February 27, 1995 and amended April 5, 1995:

(a) The sulfur dioxide emissions ~~from scrubber LA-62 (controlling emissions~~ from LA-62A and LA-62B ~~)~~ shall not exceed 1.37 pounds per hour. Compliance with this limit is equivalent to sulfur dioxide emissions of less than 6.0 tons per year.

Comment 14:

Regarding Condition D.2.4, AE Staley objects to periodic monitoring of static pressure drop for source LA-70. AE Staley believes the requirements to monitor pH, static pressure drop and flow rate of the scrubber are duplicative, burdensome inconclusive and unnecessary. According to previously issued permits (see A 157-5638, Amendment to CP 157-3581 issued May 6, 1996), the monitoring frequency for pH and flow rate is every hour rather than once per shift. AE Staley was not required to monitor static pressure drop for its scrubbers. AE Staley requests that the static pressure drop requirement be removed from this condition as the hourly monitoring of pH and scrubbant flow rate would be more than sufficient to maintain compliance.

AE Staley believes that the calibration of instruments while the equipment is in operation would not constitute a deviation from this permit and requests language to that affect be included in this condition. AE Staley requests that Condition D.2.4 be modified to read as follows:

The Permittee shall monitor the pH concentration of the recycled water from the scrubber where the pH concentration shall not be less than 5.0 and shall average 7.0 based on twelve (12) one-hour pH level recorded during each shift from LA-70 during normal operation. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when the pH and flow rate are outside of the respective normal ranges, as specified by the manufacturer, for any one reading. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.

The instruments used for determining the pH and flow rate shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months. The loss of monitoring data due to the calibration of the instruments while the equipment is in operation will not constitute a deviation from this permit.

Response to Comment 14:

IDEM agrees that the proposed monitoring is sufficient. However, accurate measurement of control device parameters is an integral part of a source's compliance monitoring program. The respective calibrations could be performed during maintenance periods and not during normal operational periods, so the IDEM, OAQ is not suggesting that any additional data loss should occur. Any monitoring data lost during maintenance activities is not a deviation from the permit so the permit language does not need to be modified.

The following changes were made in response to this comment:

D.2.4 Monitoring for Scrubber

(a) The Permittee shall monitor the pH of the scrubbing liquid~~, scrubber recirculation rate, and exhaust air stream pressure drop at least once per shift from~~ **of** the scrubber controlling emissions from LA-70 **every hour** during normal operation. **The pH shall not be less than 5.0 and shall average 7.0 based on twelve (12) consecutive one-hour pH readings recorded during each shift.**

(b) **The Permittee shall monitor the scrubber recirculation rate of the scrubber controlling emissions from LA-70 every hour during normal operation.**

(c) The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when the pH, flow rate, and pressure drop readings are outside of the respective normal ranges, as specified by the manufacturer, for any one reading. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.

(d) The instruments used for determining the pH~~,~~ **and** flow rate~~, and pressure drop~~ shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Comment 15:

Condition D.2.5 requires semi-annual inspections of the scrubber. Previously issued permits for this facility required annual inspections of the scrubbers. AE Staley recommends a similar requirement be added to this draft permit. The scrubber does not have any moving parts; therefore, the value of more frequent inspections is questionable. The scrubber maintains a high-on-stream time and any shutdowns for increased inspections will actually increase emissions since the scrubber controls a number of aspiration points in the wet milling process including numerous process tanks which continue to emit sulfur dioxide even if production is halted to conduct an inspection. Unless the aspiration systems bypass the scrubber during inspections, the increased frequency of inspections will actually increase SO2 emissions in the workplace thereby raising unnecessary safety concerns among our employees. The annual inspections along with the monitoring of the scrubbant flow rate and pH provide more than adequate means of ensuring proper operation of the scrubber. AE Staley requests that Condition D.2.5 be modified to read as follows:

An inspection of the scrubber controlling emissions from LA-70 shall be performed annually. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.

Response to Comment 15:

IDEM believes that semi-annual inspections are appropriate to facilitate continuous compliance at AE Staley's South plant. The frequency of this condition is consistent with the scrubber inspection requirements of other, very similar sources; namely T097-7714-00042 (National Starch), issued April 14, 2004 and T157-6009-00003 (AE Staley North plant), not yet issued.

No changes were made to the permit as a result of this comment.

Comment 16:

Please revise Condition D.2.7 to reflect the hourly pH and flow rate monitoring requirement. It should read:

To document compliance with Condition D.2.4, the Permittee shall maintain hourly records of the pH of the scrubbing liquid and the scrubber recirculation rate of the scrubber controlling emissions from LA-70.

Response to Comment 16:

The following changes were made to the permit as a result of this comment.

D.2.7 Record Keeping Requirements

(a) To document compliance with Condition D.2.4, the Permittee shall maintain ~~once per shift~~ **hourly** records of the pH of the scrubbing liquid~~,~~ **and** scrubber recirculation rate~~, and exhaust air stream pressure drop across~~ **of** the scrubber controlling emissions from LA-70.

Comment 17:

AE Staley requests that the construction date be corrected and changed to 1977 in D.3(c)(10) so that it would consistent with the construction date listed in Section A.2(c)(10).

Response to Comment 17:

The following change was made as a result of this comment:

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

...

(c) Feed House and Boiler House Area, consisting of:

...

(10) One (1) Feedhouse Aspiration System, identified as Unit ID LA-71, constructed in ~~1994~~**1977**, with scrubber for control (ID LA-71), exhausting to stack 4.

...

Comment 18:

As stated in the TSD document, the original source-wide uncontrolled potential to emit NOx was 2,460 tons/year as permitted in PSD 79-1551. Since several emission units were never constructed, IDEM had recalculated the source-wide emissions limit to be 1,247 tons per year. It is AE Staley's understanding that IDEM has placed NOx emission limits in the Title V Permit based on a unit's maximum potential to emit even though the source-wide limit was not intended to limit NOx emissions from individual units at the south plant facility. These individual emission limits are not acceptable to AE Staley since the permit PSD 79-1551 did not establish individual emission limits. As AE Staley could not reproduce the calculations for establishing the source-wide NOx emissions as determined by ERG, AE Staley had requested a copy of the calculations utilized for establishing the NOx source-wide emissions limit of 1,247 tons per year. AE Staley has not received the information to date and cannot make appropriate comments at this time.

AE Staley requests a 30 day extension so that it may be able to make appropriate comments on this section. When the NOx source-wide emissions limit has been mutually agreed upon then AE Staley requests that Condition D.3.1(d) be modified to read as follows:

Pursuant to PSD 79-1551, issued August 31, 1984, and as revised by this permit, the NOx emissions from LA-45, LA-46, LA-8, LA-17A, LA-15, LA-47, LA-44, and LA-28 will be less than (tons/year to be determined) and will satisfy the requirements of 326 IAC 2-2.

Response to Comment 18:

In the TSD for PSD 79-1551, issued August 31, 1984 an expansion to the source to increase capacity was permitted. The NOx PTE of this modification exceeded the relevant PSD major threshold, so the modification was reviewed pursuant to 40 CFR 52.21 and 326 IAC 2-2. Pursuant to PSD 79-1551, issued August 31, 1984, BACT for NOx was determined to be: 1) a source-wide NOx limit of 2,460 tons per year, and 2) coal feed and combustion techniques of excess air control for boiler LA-50. During the Part 70 review process, IDEM determined that the source-wide uncontrolled potential to emit NOx was 2,460 tons per year at the time PSD 79-1551 was issued. Since that time, several emission units covered by the 2,460 ton limit have been removed. Therefore, the 2,460 ton limit was revised to reflect the removed units, clarify which specific units are subject, and provide practically enforceable facility-specific limits. However, upon further review, IDEM determined that several emission factors used to create the revised limit(s) were inaccurate. As a result, the following changes had been made to reflect the appropriate emission limits. Note that the sum of the facility-specific NOx limits remains considerably less than the original 2,460 ton limit.

~~D.3.1~~**D.3.2** Prevention of Significant Deterioration (PSD) [326 IAC 2-2] [40 CFR 52.21]

...

(d) Pursuant to PSD 79-1551, issued August 31, 1984, and as revised by this permit, the NO_x emissions from:

(1) LA-45 shall not exceed ~~101~~ **119** pounds per hour and ~~443~~ **523** tons per twelve consecutive month period.

(2) LA-46 shall not exceed ~~19.4~~ **7.1** pounds per hour and ~~85~~ **31** tons per twelve consecutive month period.

(3) LA-8 shall not exceed ~~22.8~~ **65.6** pounds per hour and ~~100~~ **287** tons per twelve consecutive month period.

(4) LA-17A shall not exceed ~~17.8~~ **6.6** pounds per hour and ~~78~~ **29** tons per twelve consecutive month period.

(5) LA-15 shall not exceed ~~3.88~~ **93.4** pounds per hour and ~~17~~ **409** tons per twelve consecutive month period.

(6) LA-47 shall not exceed ~~21.7~~ **7.9** pounds per hour and ~~95~~ **34.4** tons per twelve consecutive month period.

(7) LA-44 shall not exceed ~~89.2~~ **32.4** pounds per hour and ~~391~~ **142** tons per year; and

(8) LA-28 shall not exceed 8.67 **3.2** pounds per hour and ~~38~~ **14** tons per year.

Compliance with these limits is equivalent to total NO_x emissions from these facilities of less than ~~1,247~~ **1,469** tons per year and will satisfy the requirements of 326 IAC 2-2.

...

Comment 19:

As stated in the TSD document, the original source-wide uncontrolled potential to emit CO was 280 tons/year as permitted in PSD 79-1551. Since several emission units were never constructed, IDEM had recalculated the source-wide emissions limit to be 208 tons per year. It is AE Staley's understanding that IDEM has placed CO emission limits in the Title V Permit based on a unit's maximum potential to emit even though the source-wide limit was not intended to limit CO emissions from individual units at the south plant facility. These individual emission limits are not acceptable to AE Staley since the permit PSD 79-1551 did not establish individual emission limits. As AE Staley could not reproduce the calculations for establishing the source-wide CO emissions as determined by ERG, AE Staley had requested a copy of the calculations utilized for establishing the CO source-wide emissions limit of 208 tons per year. AE Staley has not received the information to date and cannot make appropriate comments at this time.

AE Staley requests a 30 day extension so that it may be able to make appropriate comments on this section. When the CO source-wide emissions limit has been mutually agreed upon then AE Staley requests that Condition D.3.1(e) be modified to read as follows:

Pursuant to PSD 79-1551, issued August 31, 1984, and as revised by this permit, the CO

emissions from LA-45, LA-46, LA-8, LA-17A, LA-15, LA-47, LA-44, and LA-28 will be less than (tons/year to be determined) and will satisfy the requirements of 326 IAC 2-2.

Response to Comment 19:

AE Staley has clarified that it requests an increase in a number of the aforementioned CO limits. The TSD of PSD 79-1551, issued August 31, 1984, permitted an expansion to the source to increase capacity. The CO PTE of this modification exceeded the relevant PSD major threshold, so the modification was reviewed pursuant to 40 CFR 52.21 and 326 IAC 2-2. Pursuant to PSD 79-1551, issued August 31, 1984, BACT for CO was determined to be a source wide limit of 280 tons per year. Since this limit results from a BACT determination necessary to comply with the requirements of PSD, it cannot be increased without another BACT review.

Upon further review and research into AE Staley's request, IDEM has determined that AE Staley has apparently exceeded the 280 ton CO limit. This determination is based on the following: 1) all of AE Staley's existing combustion units are covered by the 280 ton per year CO limit; and in 2001, AE Staley reported actual CO emissions of approximately 340 tons per year. As a result, and until an official evaluation has been completed, the following condition has been added to the permit and the following changes have been made:

D.3.1 CO Emissions [326 IAC 2-2] [326 IAC 2-7-6(3)] [326 IAC 2-7-15]

The IDEM, OAQ has information that indicates that the CO emissions from facilities LA-45, LA-46, LA-8, LA-15, LA-17A, LA-47, LA-44, and LA-28 have contributed to a violation of 326 IAC 2-2 (Prevention of Significant Deterioration). Therefore, the Permit Shield provided in Section B of this permit does not apply to those emission units with regards to 326 IAC 2-2 (PSD). The OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 2-2 (PSD) and a schedule for achieving compliance with such requirements once this issue has been thoroughly reviewed.

Comment 20:

Regarding Condition D.3.6(b)(2) (now Condition D.3.7(b)(2)), the ESP TR set components should only be required to be inspected at least once a year. Opacity is continuously monitored from the coal boiler (LA-45). This monitoring and once a year inspections should be more than sufficient to ensure compliance. AE Staley requests that condition D.3.7(b)(2) be modified as follows:

ESP TR set components inspected at least once annually. At a minimum, the following inspections shall be performed:

Response to Comment 20:

The IDEM OAQ does not agree with AE Staley's proposed changes. The electrostatic precipitator (ESP) has the potential to reduce emissions from LA-45 by up to 10,000 tons of PM per year. Proper operation and preventive maintenance of the ESP and its transformer-rectifier (TR) sets is therefore critical to ensuring continuous compliance and preserving air quality.

No changes were made to the permit as a result of this comment.

Comment 21:

The air and water infiltration should only be inspected at least once a year. Opacity is continuously monitored from the coal boiler (LA-45). This monitoring and once a year inspections should be

more than sufficient to ensure compliance. AE Staley requests that Condition D.3.6(b)(3) (now Condition D.3.7(b)(3)) be modified as follows:

> *Air and water infiltration inspected at least once annually. The recommended method for this inspection is for audible checks around ash hoppers/hatches, duct expansion joints and areas of corrosion.*

In addition, the requirement for quarterly inspections of the multiclone in Condition D.3.7(c) is excessive and should be changed to annually. The coal boiler has a high-on stream time and the condition could force the facility to shutdown the boiler for no other reason than to check the multiclone. In addition, opacity is continuously monitored from the coal boiler (LA-45). The opacity monitoring and the once a year inspection should be more than sufficient to ensure compliance.

Response to Comment 21:

See Response to Comment 20 regarding the air and water infiltration inspections.

IDEM, OAQ understands the plant's high demand of boiler LA-45 and the problems that would result from shutting the boiler down each quarter for inspections. Considering this and the fact that a COM is used, the following changes were made as a result of this comment:

~~D.3.6~~**D.3.7** Preventive Maintenance Plan [326 IAC 2-7-5(13)]

...

(c) The PMP for a multiclone shall include inspections of the internal components of the multiclone, conducted ~~quarterly~~ **annually** in accordance with the Section B - Preventive Maintenance Plan. Items to be checked include air infiltration, plugging of inlet spinner vanes, outlet tube erosion, deposits on the inside surfaces of the cyclone tubes, and plugging of the bottom of the cyclone tubes.

Comment 22:

AE Staley requests that the sentence "PM-10 includes filterable and condensable PM-10" be removed from Condition D.3.12 (now Condition D.3.13) for several reasons. SSM 157-11449-00033 clearly does not include this language. In addition, measurement of filterable PM10 is not possible for scrubbers LA-67, LA-68 and LA-69. Methods 201 and 201A have been determined to be inappropriate methods for measurement of PM10 from scrubbers (See 55 Fed. Reg. 14248). AE Staley has previously determined that PM10 can be assumed to be 100% of PM; therefore, a Method 5 test is appropriate for this source. A similar testing condition appeared in the recently issued #2 flash dryer system permit (157-14974-00003) at AE Staley's Sagamore facility. This condition, including the apparent requirement to measure condensable emissions, is the subject of an appeal filed January 3, 2003 before the Indiana Office of Environmental Adjudication. Exhibit D of that appeal includes stack testing language acceptable to AE Staley. AE Staley requests that this condition include that language and should be modified as follows:

> *Pursuant to SSM 157-11449-00033, issued August 16, 2000, the Permittee shall perform PM, PM10 , VOC, and SO2 testing on LA-67, LA-68 and LA-69 no later than May 19, 2008, utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. If PM-10 is assumed at 100% of PM, only PM tests need be performed. Testing shall be conducted in accordance with Section C - Performance Testing.*

Response to Comment 22:

The following changes were made in response to this comment:

~~D.3.12~~**D.3.13** Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Pursuant to SSM 157-11449-00033, issued August 16, 2000, the Permittee shall perform PM, PM_{10}, VOC, and SO_2 testing on LA-67, LA-68, and LA-69 no later than May 19, 2008, utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. ~~PM-10 includes filterable and condensible PM-10.~~ **If PM-10 is assumed to be 100% of PM, only PM tests need be performed.** Testing shall be conducted in accordance with Section C- Performance Testing.

Comment 23:

AE Staley is concerned with the imposition of visible emissions inspections on any frequency greater than once per day. For many of the bagfilters, visible emissions evaluations are required to be performed once per shift in the draft permit. AE Staley operates two shifts at the South Plant facility (6 am – 6 pm and 6 pm – 6 am). For the second shift, it is not possible to obtain visible emission notations “during normal daylight operations” during winter months. For the rest of the year, there are only about three hours, at most, during the twelve hour second shift in which to perform the emissions notations.

Recording visible emission notations of the exhaust from stack 4 does not make any sense whatsoever. A number of other sources besides the ones listed (except LA-53 exhausts to stack 7) in this condition exhaust to stack 4. AE Staley believes that recording visible emissions should only be performed on stacks with a limited number of pollution control devices exhausting to it. This condition is not necessary since most of the sources exhausting through this stack already have monitoring and recordkeeping requirements.

AE Staley requests that Condition D.3.13(a)(now Condition D.3.14(a)) should be changed for the remaining source LA-53 to reflect per day visible emission notations rather than per shift. AE Staley requests that this condition be modified so that it would be consistent with recently issued permits from IDEM for AE Staley facilities. In addition, AE Staley operates two shifts at the Lafayette South facility (6:00 am to 6pm and 6pm to 6am). For the second shift, it is not possible to obtain visible emission notations "during normal daylight operations" during winter months. For the remainder of the year, there are only about three hours, at most, during the twelve hour second shift in which to perform the emissions notations. AE Staley believes that monitoring daily visible emissions is more than sufficient to maintain compliance. AE Staley requests that Condition D.3.14(a) be modified as follows:

> *Visible emission notations of the exhaust from stack 7 (exhausting emissions from LA-53) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal*.

AE Staley requests that Condition D.3.14 (b) should be changed for source LA-44 to reflect per day visible emission notations rather than per shift. AE Staley requests that this condition be modified so that it would be consistent with recently issued permits from IDEM for AE Staley facilities. In addition, AE Staley operates two shifts at the Lafayette South facility (6:00 am to 6pm and 6pm to 6am). For the second shift, it is not possible to obtain visible emission notations "during normal daylight operations" during winter months. For the remainder of the year, there are only about three hours, at most, during the twelve hour second shift in which to perform the emissions notations. AE Staley believes that monitoring daily visible emissions is more than sufficient to maintain compliance. AE Staley requests that Condition D.3.14(b) be modified as follows:

> *Visible emission notations of the exhaust from stack 34 (exhausting emissions from LA-44)*

shall be performed once per day during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.

Response to Comment 23:

Visible emissions notations are used to determine compliance with 326 IAC 5-1 and 326 IAC 6, and render the requirements of 326 IAC 2-2 not applicable. This monitoring requirement is designed: 1) as a trigger for the source to perform some corrective action on the facility if visible emissions are abnormal, and 2) to ensure continuous compliance with the respective emission limitations. IDEM believes that once per shift notations are reasonable, adequate, and necessary to demonstrate continuous compliance with permit requirements. Control device failure can occur suddenly and during any shift, and once per shift visible emission monitoring can minimize lag time in addressing control failure. The fact that multiple units exhaust to a single stack does not preclude those units from being complying with the aforementioned requirements. In addition, IDEM has already evaluated AE Staley's emission units for reduced compliance monitoring; the results of which are reflected in the draft permit.

IDEM recognizes that there may be periods during the year in which visible emission notations may not be conducted during AE Staley's second shift (6 pm - 6 am). For that reason, the permit requires the respective monitoring to be performed " ... during normal daylight operations."

In conclusion, 1) AE Staley has not provided sufficient information, for the units in question, that demonstrates that daily visible emission notations will ensure continuous compliance; and 2) IDEM's decision to require per shift visible emission notations is consistent with other similar source permitting decisions.

No changes were made to the permit as a result of this comment.

Comment 24:

The requirement for quarterly inspections of the cyclone controlling LA-53 in Condition D.3.15 is excessive and should be changed to annually. The cyclone is under positive pressure and therefore leakage would be noticed without the need for an internal inspection.

Response to Comment 24:

Following the receipt and review of additional information from AE Staley regarding the cyclone controlling emissions from LA-53, IDEM has determined that inspections on a annual, instead of quarterly, basis will ensure continuous compliance. Specifically, AE Staley indicated that the cyclone captures nearly 100% of the particulate emissions generated by LA-53, and LA-53 has, to IDEM's knowledge, continually complied with all applicable requirements. Cyclones are an ubiquitous and proven particulate control device that are often chosen as integral product separators because of their reliability. While the cyclone on LA-53 is not integral to the process, IDEM believes that an annual inspection frequency is sufficient.

The following changes were made in response to this comment:

~~D.3.14~~**D.3.15** Cyclone Inspections

An inspection shall be performed **at least** each calendar ~~quarter~~ **year** of the cyclone controlling LA-53. Inspections required by this condition shall not be performed in consecutive months.

Comment 25:

AE Staley requests that Condition D.3.17(h) be changed so that the calibration of instruments while the equipment is in operation would not constitute a deviation from this permit and requests language to that effect be included in this condition. AE Staley requests that Condition D.3.17(h) be modified to read as follows:

The instruments used for determining the pH and flow rates shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months. The loss of monitoring data due to the calibration of the instruments while the equipment is in operation will not constitute a deviation from this permit.

Response to Comment 25:

See Response to Comment 14. No changes were made to the permit as a result of this comment.

Comment 26:

AE Staley requests that Condition D.3.19 be removed from the permit. AE Staley objects to periodic monitoring of static pressure drop for the multi-clone. The continuous opacity monitoring of source LA-45 and the annual inspection of the multi-clone is more than sufficient to ensure compliance.

Response to Comment 26:

IDEM, OAQ agrees that periodic monitoring of the multi-clone is unnecessary when there is a COM as along as the appropriate response threshold has been established for the unit.

IDEM agrees that the COMS used on boiler LA-45 is sufficient to ensure continuous compliance with the applicable particulate emission and opacity limitations as long as the appropriate opacity trigger is included in the permit. The opacity trigger, included in Conditions D.3.21 and D.3.22, is used to determine when response steps must be taken prevent noncompliance. After further review of the measured particulate emissions and opacity from past test results on LA-45, the appropriate opacity trigger for the COMS on boiler LA-45 is 30% (instead of 38%). In addition, the correct corresponding time frame is three (3) consecutive six-minute averages (instead of two (2) six-minute averages).

The following changes were made in response to this comment:

~~D.3.19 Multiclone Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~

~~(a) The ability of the multiclone to control particulate emissions from LA-45 shall be monitored at least once per shift, when the unit is in operation, by measuring and recording the total static pressure drop across the multiclone. Pressure drop monitoring equipment shall be installed in accordance with Section C - Compliance Monitoring.~~

~~(b) Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the static pressure drop is outside of the normal operating range for the corresponding boiler steam load. A pressure drop reading that is outside normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.~~

...

D.3.21 Opacity Readings

The ability of the continuous opacity monitor (COM) to monitor particulate emissions from boiler LA-45 shall be monitored by continuously measuring and recording the opacity of emissions from the stack exhaust.

Appropriate response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the opacity from the boiler exceeds thirty~~-eight~~ percent (~~38~~ **30**%) for any ~~two~~ **three (3)** consecutive six-minute average period. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.3.22 Method 9 Opacity Readings and Visible Emissions Notations

(a) Whenever a continuous opacity monitor (COM) is malfunctioning, the Permittee shall follow the procedures in accordance with Section C - Maintenance of Continuous Opacity Monitoring Equipment, until such time that the continuous opacity monitor is back in operation.

(b) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed or whenever the opacity from a boiler exceeds thirty~~-eight~~ percent (~~38~~ **30**%) for any ~~two~~ **three (3)** consecutive six-minute average periods. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

Comment 27:

AE Staley requests that Condition D.3.23(d) be modified to reflect the per day visible emission notations rather than per shift as discussed in its comments for Condition D.3.13 (now D.3.14). AE Staley requests that Condition D.3.23(g) be deleted as discussed in its comments for Condition D.3.19.

Response to Comment 27:

See Response to Comment 23. No changes were made to the permit as a result of this comment.

Comment 28:

The first two sections of Condition D.3.24 (Reporting Requirements) are entitled (a). Please correct this section accordingly.

Response to Comment 28:

The following changes were made as a result of this comment.

D.3.24 Reporting Requirements

(a) A certification, signed by the responsible official, shall be submitted, that certifies all of the fuels combusted during the twelve month period.

(~~a~~**b**) The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas-fired boiler certification submitted by the Permittee

does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 29:

AE Staley requests that Condition D.3.24(d) be modified to indicate that the oil analysis may be based on the suppliers invoice and shall be submitted upon request rather than submitted monthly in accordance with 326 IAC 7-2-1(d). AE Staley requests that this condition be modified to read as follows:

To ensure compliance with Conditions D.3.10 and D.3.11, test results along with the amount of coal burned shall be submitted quarterly. Oil analysis may be based on the suppliers' invoice and shall be submitted upon request.

Response to Comment 29:

Pursuant to 326 IAC 7-2-1(c)(2), the reports must be submitted quarterly. No changes were made to the permit as a result of this comment.

Comment 30:

AE Staley requests that the facility description in Condition D.4(d)(12) be added to this section of the permit. Condition D.4(d)(12) needs to be incorporated into the permit because AE Staley will make a minor modification to the recently issued permit SSM 157-16682-00033. The minor modification will reduce the airflow required for source LA-77 from 12,000 acfm to 9,000 acfm and add source LA-82 (Blond Pellet Bin) with airflow requirements of 3,000 acfm exhausting to the atmosphere. The Blond Pellet Bin (LA-82) was originally to be aspirated to another emission source of the Feed Products Storage and Loadout area but it had been determined that it would not be feasible as originally designed. As such, source LA-82 will now have two baghouses that will be aspirated to a single stack (S/V 61). The net change in emissions from this minor modification will be 0 pounds in PM/PM10. Detailed airflow calculations are attached as Attachment 2 for the modifications of these two sources.

AE Staley requests that facility description D.4.(d)(12) be added to this section of the permit as follows:

One (1) blond Pellet Bin , identified as Unit LA-82, constructed in 2004, with two (2) integral baghouses for control, exhausting to stack 61.

Response to Comment 30:

Given that the net emissions difference is minimal and that LA-83 is very similar to LA-64 in the sense that its baghouse will be integral, the following changes were made to the permit as a result of this comment.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices: (Note that the maximum process capacities of these units have been included in an OAQ file that is being treated as confidential until a determination has been made):

...

(d) Feed Products Storage and Loadout Area, consisting of:

...

(12) One (1) blond Pellet Bin, identified as Unit ID LA-82, constructed in 2004, with two baghouses for control, exhausting to stack 61.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(d) Feed Products Storage and Loadout Area, consisting of:

...

(12) One (1) blond Pellet Bin, identified as Unit ID LA-82, constructed in 2004, with two baghouses for control, exhausting to stack 61.

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

D.4.1 Prevention of Significant Deterioration [326 IAC 2-2]

...

(d) Pursuant to SSM 157-16882-00033, issued December 5, 2003**, and as revised by this permit**:

(1) The PM/PM10 emissions shall not exceed the limits listed in the table below:

Unit ID	PM/PM10 emission limit (lb/hr)	PM/PM10 emission limit (ton/yr)
LA-21B	0.26	1.13
LA-63	3.00	13.1
LA-64	1.29	5.65
LA-77	~~1.03~~ **0.77**	~~4.51~~ **3.38**
LA-79	1.71	7.48
LA-80	1.71	7.48
LA-81	1.71	7.48
LA-82	**8.26**	**1.13**
LA-83	1.03	4.51

D.4.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from facilities LA-22, LA-21, LA-18, LA-63, LA-64, LA-77, LA-21B, LA-79, LA-80, LA-81, **LA-82** and LA-83 shall not exceed the pound per hour emission rate established as E in the following formula:

D.4.4 Particulate Control

In order to comply with Conditions D.4.1 and D.4.2,

(a) The baghouses for particulate control, including those integral to the process, shall be in operation and control emissions from LA-22, LA-21, LA-18, LA-64, LA-21B, **LA-82** and LA-83 at all times those facilities are in operation.

D.4.6 Visible Emissions Notations

(a) Visible emission notations of the stack exhaust from LA-22, LA-21, LA-18, LA-21B, LA-63, LA-64, LA-79, LA-80, LA-81, **LA-82** and LA-83 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

D.4.7 Parametric Monitoring

(a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with LA-22, LA-21, LA-18, **LA-82** and LA-64, at least once per day when these facilities are in operation. When for any one reading or observance, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.4.8 Baghouse and Cyclone Inspections

(a) An inspection of all bags, controlling particulate emissions from facilities LA-22, LA-21, LA-18, LA-64, LA-21B, **LA-82** and LA-83 shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

Comment 31:

AE Staley requests that Condition D.4.1(c)(2) be removed from the permit. Condition D.4.1(d)(1) for source LA-63 has superseded this condition.

Response to Comment 31:

The following changes were made to the permit as a result of this comment.

D.4.1 Prevention of Significant Deterioration [326 IAC 2-2]

...

(c) Pursuant to CP 157-3581-00033, issued February 27, 1995 and amended April 5, 1995, ~~:~~

~~(1) T~~the PM/PM10 emissions from LA-21 shall not exceed 1.03 pounds per hour. Compliance with this limit is equivalent to PM/PM10 emissions of less than or equal to 4.5 tons per year.

~~(2) The PM/PM10 emissions from LA-63 shall not exceed 0.12 lb/ton (based on pre-control emissions of 6.0 lb/ton and a control efficiency of 98%) and 29.2 tons per year.~~

Comment 32:

AE Staley requests that limits of 0.26 lb/hr and 1.13 tpy (for unit LA-82) be added to the Condition D.4.1(d)(1) table. Please revise the limits on unit LA-77 from 1.29 lb/hr and 5.65 tpy to 0.77 lb/hr and 3.38 tpy.

Response to Comment 32:

See Response to Comment 30.

Comment 33:

AE Staley requests that Condition D.4.1(d)(2) be modified so that it reads as stated in SSM 157-16882-00033. AE Staley requests that this condition should be changed to read as follows:

The Permittee shall remove or shut down units LA-19, LA-20, LA-23, LA-24, LA-49 and LA-59.

Response to Comment 33:

The following changes were made to the permit as a result of this comment.

D.4.1 Prevention of Significant Deterioration [326 IAC 2-2]

...

(d) Pursuant to SSM 157-16882-00033, issued December 5, 2003**, and as revised by this permit**:

...

(2) The Permittee shall shut down units LA-19, LA-20, LA-23, LA-24, LA-49, and LA-59 ~~prior to the operation of units LA-21B, LA-79, LA-80, LA-81, and LA-83~~.

Comment 34:

AE Staley requests that source LA-82 be added to Condition D.4.4(a) where the condition would read as follows:

The baghouses for particulate control, including those integral to the process, shall be in operation and control emissions from LA-22, LA-21, LA-18, LA-64, LA-21B, LA-82 and LA-83 at all times those facilities are in operation.

Response to Comment 34:

See Response to Comment 30.

Comment 35:

AE Staley requests that source LA-82 be added to Condition D.4.6(a) where the condition would read as follows:

Visible emission notations of the stack exhaust from LA-22, LA-21, LA-18, LA-21B, LA-63, LA-64, LA-79, LA-80, LA-81, LA-82 and LA-83 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal

or abnormal.

Response to Comment 35:

See Response to Comment 30.

Comment 36:

AE Staley requests that Condition D.4.6(b) be modified to reflect per day visible emission notations rather than per shift. AE Staley requests that this condition be modified so that it would be consistent with recently issued permits from IDEM for AE Staley facilities. In addition, AE Staley operates two shifts at the Lafayette South facility (6:00 am to 6pm and 6pm to 6am). For the second shift, it is not possible to obtain visible emission notations "during normal daylight operations" during winter months. For the remainder of the year, there are only about three hours, at most, during the twelve hour second shift in which to perform the emissions notations. AE Staley believes that monitoring daily visible emissions is more than sufficient to maintain compliance.

Response to Comment 36:

See Response to Comment 23.

Comment 37:

AE Staley requests that source LA-82 be added to Condition D.4.8(a) where the condition would read as follows:

An inspection of all bags, controlling particulate emissions from facilities LA-22. LA-21, LA-18, LA-64, LA-21B, LA-82 and LA-83 shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

Response to Comment 37:

See Response to Comment 30.

Comment 38:

AE Staley requests that Condition D.4.8(c) be removed from this permit for several reasons. Recent permits issued to AE Staley have never included this condition before. There is no limitation regarding the frequency for which this condition could apply. Theoretically, a facility could be required to inspect a bagfilter or cyclone several times in the same week. The logistics of performing dozens of bagfilter and cyclone inspections during unforeseen events where the whole facility or a large portion of the facility have been shutdown for more than 24 hours is staggering for this facility. AE Staley simply will not have the personnel to conduct these inspections.

Response to Comment 38:

See Response to Comment 9.

Comment 39:

AE Staley objects to periodic monitoring of static pressure drop for source LA-77. AE Staley

believes the requirements to monitor visible emissions, static pressure drop and flow rate of the scrubber are duplicative, burdensome inconclusive and unnecessary. According to the previously issued Permit # 157-11449-00033, AE Staley was not required to monitor static pressure drop for this source. AE Staley requests that the static pressure drop requirement be removed from this condition as monitoring visible emissions and scrubbant flow rate would be more than sufficient to maintain compliance. As a resutl, AE Staley requests that Condition D.4.1(a) be modified as follows:

> *The Permittee shall monitor and record the flow rate from the scrubber controlling emissions from LA-77, at least once per shift, when the respective facility is in operation.*

AE Staley requests that Condition D.4.11(b) be modified so that the calibration of instruments while the equipment is in operation would not constitute a deviation from this permit and requests language to that affect be included in this condition. Condition D.4.11(b) should be modified to read as follows:

> *The instrument used for determining flow rate shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months. The loss of monitoring data due to the calibration of the instruments while the equipment is in operation will not constitute a deviation from this permit.*

Response to Comment 39:

As indicated in SSM 157-11449-00033, issued August 16, 2000, the air stream pressure drop across the scrubber is not necessary; however, hourly, instead of per shift, flow rate readings are required.

Accurate measurement of control device parameters is an integral part of a source's compliance monitoring program. The respective calibrations could be performed during maintenance periods and not during normal operational periods, so the IDEM, OAQ is not suggesting that any additional data loss should occur. Any monitoring data lost during maintenance activities is not a deviation from the permit so the permit language does not need to be modified.

The following changes were made in response to this comment:

D.4.11 Scrubber Monitoring

(a) The Permittee shall monitor and record the ~~pressure drop and~~ **scrubbing liquid** flow rate from the scrubber controlling emissions from LA-77, at least once per ~~shift~~ **hour**, when the respective facility is in operation. ~~When, for any one reading, the pressure drop across the scrubber is outside the normal range of 1.5 and 3.0 inches of water, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports.~~ **The flow rate shall not average less than 25 gallons based on twelve (12) consecutive one-hour readings recorded during each shift.**

(b) When for any one reading, the flow rate is less than the normal range of 25 gallons per minute, or a minimum rate established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading or flow rate that is outside the above mentioned ranges, is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.

(~~b~~ **c**) The instrument used for determining the flow rate shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.4.14 Record Keeping Requirements

...

(e) To document compliance with Condition D.4.11, the Permittee shall maintain once per shift **flow rate** records ~~of the following parameters~~ of the scrubber controlling emissions from LA-77:

~~(1) Pressure drop; and~~

~~(2) Flow rate.~~

Comment 40:

The requirement for annual inspections of the scrubber exists in the previously issued permit 157-11449-00033 for this facility. AE Staley recommends a similar requirement be added to this draft permit. The scrubber does not have any moving parts; therefore, the value of more frequent inspections is questionable. The annual inspections along with the monitoring of the scrubbant flow rate and daily visible emission observations provide more than adequate means of ensuring proper operation of the scrubber. AE Staley requests that the condition be modified to read as follows:

An inspection of the scrubber controlling emissions from facility LA-77 shall be performed each calendar year. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.

Response to Comment 40:

See Response to Comment 15.

Comment 41:

AE Staley requests that Condition D.4.14(b) be modified to reflect the per day visible emission notations rather than per shift as discussed in its comments for Condition D.4.6.

Response to Comment 41:

See Response to Comment 23.

Comment 42:

AE Staley requests that Condition D.5(a)(1) be deleted and replaced by proposed condition D.5.1(b)(3) (see below) since Permit CP 157-3581-00033 lists the most recent modification to source LA-29 and supersedes OP 79-07-89-0345.

Source LA-29 should be moved to this section since the most recent modification is listed under this permit. The permit CP 157-3581-00033 did not specifically state the emission limitations for this source but the permit application that was submitted did specify an emissions limitation. Due

to the insignificant nature of the increase, AE Staley requests that the condition should be included as item (3) and read as follows:

The particulate emissions from LA-29 shall not exceed 0.11 pounds per hour and 0.5 tons per year

Response to Comment 42:

IDEM accepts AE Staley's proposal to increase the maximum allowable emission rate of LA-29 by 0.2 tons per year. While this limitation may have been included in the permit application for CP 157-3581-00033, it was not included in the permit so a reference to that permit will not be provided.

Note that LA-29 was not subject to the requirements of 326 IAC 2-2 and 40 CFR 52.21 as the draft permit indicates. The appropriate correction has been made to indicate that the limit was to render the requirements of PSD not applicable.

The following changes were made in response to this comment:

D.5.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2] [40 CFR 52.21]

(a) Pursuant to OP 79-07-89-0345, issued February 5, 1986:

~~(1) The particulate emissions from LA-29 shall not exceed 0.07 pounds per hour and 0.3 tons per year.~~

(~~2~~ **1**) The total particulate emissions from LA-31 shall not exceed 0.05 pounds per hour and 0.2 tons per year.

(~~3~~ **2**) The particulate emissions from LA-32 shall not exceed 0.03 pounds per hour and 0.1 tons per year.

(~~4~~ **3**) The sulfur dioxide emissions from LA-28 shall not exceed 10.4 pounds per hour and 45.6 tons per year.

...

(e) The particulate emissions from LA-29 shall not exceed 0.11 pounds per hour and 0.5 tons per year.

Compliance with these limitations shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Comment 43:

AE Staley requests that Condition D.5.7(a) be changed to reflect per day visible emission notations rather than per shift. AE Staley requests that this condition be modified so that it would be consistent with recently issued permits from IDEM for AE Staley facilities. In addition, AE Staley operates two shifts at the Lafayette South facility (6:00 am to 6pm and 6pm to 6am). For the second shift, it is not possible to obtain visible emission notations "during normal daylight operations" during winter months. For the remainder of the year, there are only about three hours, at most, during the twelve hour second shift in which to perform the emissions notations. AE Staley believes that monitoring daily visible emissions is more than sufficient to maintain compliance.

Response to Comment 43:

See Response to Comment 23.

Comment 44:

Regarding Condition D.5.11(a), AE Staley objects to periodic monitoring of static pressure drop for source LA-61. AE Staley believes the requirements to monitor pH, the static pressure drop and flow rate of the scrubber are duplicative, burdensome inconclusive and unnecessary. According to previously issued permits, AE Staley was not required to monitor static pressure drop for scrubbers. AE Staley requests that the static pressure drop requirement be removed from this condition as monitoring pH and scrubbant flow rate once per shift would be more than sufficient to maintain compliance.

Response to Comment 44:

As indicated in Response to Comment 14, IDEM agrees that monitoring of the scrubber's pressure drop is not necessary when pH and flow rate are measured.

The following changes were made in response to this comment:

D.5.11 Scrubber Monitoring

(a) The Permittee shall monitor the pH of the scrubbing liquid~~,~~ **and** scrubber recirculation rate~~, and exhaust air stream pressure drop~~ at least once per shift of the scrubber controlling emissions from LA-61 during normal operation. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when the pH~~,~~ **or** flow rate~~, and pressure drop~~ readings are outside of the respective normal ranges, as specified by the manufacturer, for any one reading. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.

D.5.15 Record Keeping Requirements

...

(g) To document compliance with Condition D.5.11, the Permittee shall maintain:

(1) Once per shift records of the scrubbing liquid pH~~,~~ **and** scrubber recirculation rate~~, and exhaust air stream pressure drop~~ of the scrubber controlling emissions from LA-61.

Comment 45:

Regarding Condition D.5.11(b), AE Staley objects to periodic monitoring of static pressure drop for units LA-29 and LA-28. AE Staley believes the requirement to monitor the static pressure drop is duplicative, burdensome inconclusive and unnecessary. According to previously issued permits, AE Staley was not required to monitor static pressure drop for scrubbers. AE Staley requests that the static pressure drop requirement be removed from this condition as scrubbant flow rate on a once per shift basis would be more than sufficient to maintain compliance for these units.

Response to Comment 45:

In order to be consistent with the requirements for other scrubbers located at this source, the following changes were made in response to this comment:

D.5.11 Scrubber Monitoring

...

(b) The Permittee shall monitor the scrubber recirculation rate ~~and exhaust air stream pressure drop~~ at least once per shift of the scrubbers controlling emissions from LA-28 and LA-29 during normal operation. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when the flow rate ~~and pressure drop~~ readings are outside of the respective normal ranges, as specified by the manufacturer, for any one reading. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.

D.5.15 Record Keeping Requirements

...

(g) To document compliance with Condition D.5.11, the Permittee shall maintain:

...

(2) Once per shift records of the scrubber recirculation rate ~~and exhaust air stream pressure drop~~ of the scrubbers controlling emissions from LA-28 and LA-29.

Comment 46:

AE Staley requests that Condition D.5.11(d) be modified so that the calibration of instruments while the equipment is in operation would not constitute a deviation from this permit and requests language to that affect be included in this condition. Condition D.5.11(d) should be modified to read as follows:

The instruments used for determining the pH and flow rates shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months. The loss of monitoring data due to the calibration of the instruments while the equipment is in operation will not constitute a deviation from this permit.

Response to Comment 46:

See Response to Comment 14.

Comment 47:

The requirement for annual inspections of scrubbers exists in previously issued permits for this facility. AE Staley recommends a similar requirement be made in Condition D.5.12. The scrubbers do not have any moving parts; therefore, the value of more frequent inspections is questionable. The scrubbers maintain a high-on-stream time and any shutdowns for increased inspections will actually increase emissions. The annual inspections along with the monitoring of

the scrubbant flow rate and pH provide more than adequate means of ensuring proper operation of the scrubbers.

Response to Comment 47:

See Response to Comment 15.

Comment 48:

AE Staley requests that Condition D.5.15(c) be changed to reflect per day visible emission notations rather than per shift. AE Staley requests that this condition be modified so that it would be consistent with recently issued permits from IDEM for AE Staley facilities. In addition, AE Staley operates two shifts at the Lafayette South facility (6:00 am to 6pm and 6pm to 6am). For the second shift, it is not possible to obtain visible emission notations "during normal daylight operations" during winter months. For the remainder of the year, there are only about three hours, at most, during the twelve hour second shift in which to perform the emissions notations. AE Staley believes that monitoring daily visible emissions is more than sufficient to maintain compliance.

Response to Comment 48:

See Response to Comment 23.

Comment 49:

As explained in detail earlier, AE Staley requests that the pressure drop requirements listed in Condition D.5.15(g) items 1 and 2 be removed since parametric monitoring is not acceptable to AE Staley.

Response to Comment 49:

See Response to Comment 8.

Comment 50:

AE Staley has modified the emissions calculation method (now utilizing grain loading and airflow) as requested in its Title V Operating Permit Application. Due to the minor nature of these changes, AE Staley requests that Conditions D.6.1(a) through (h) be modified to read as follows:

(a) The particulate emissions from LA-33 shall not exceed 1.77 pounds per hour and 7.8 tons per year.

(b) The particulate emissions from LA-34 shall not exceed 0.69 pounds per hour and 3.0 tons per year.

(c) The particulate emissions from LA-35 shall not exceed 0.51 pounds per hour and 2.2 tons per year.

(d) The particulate emissions from LA-36 shall not exceed 0.84 pounds per hour and 3.7 tons per year.

(e) The particulate emissions from LA-37 shall not exceed 0.10 pounds per hour and 0.44 tons per year.

(f) The particulate emissions from LA-38 shall not exceed 0.10 pounds per hour and 0.44 tons per year.

(g) The particulate emissions from LA-42A shall not exceed 0.33 pounds per hour and 1.4 tons per year.

(h) The particulate emissions from LA-42B shall not exceed 0.9 pounds per hour and 3.9 tons per year.

Response to Comment 50:

The limits provided in the draft permit were limits from a previous permit that were necessary to keep emissions less than 1243 tons per year so that PSD did not apply. Because of equipment removal and other changes at the source, the total limited emissions from the limited equipment is well less than this number at about 251 tons per year. Therefore, the relatively small increase in emissions that these changes represent would still not increase emissions of PM over the 1243 tons per year limit. Therefore, IDEM has made the following changes to the permit:

D.6.1 Prevention of Significant Deterioration [326 IAC 2-2] [40 CFR 52.21]

Pursuant to OP 79-07-89-0345, issued February 5, 1986:

(a) The particulate emissions from LA-33 shall not exceed ~~2.2~~**1.77** pounds per hour and ~~1.0~~**7.8** tons per year.

(b) The particulate emissions from LA-34 shall not exceed ~~2.2~~**0.69** pounds per hour and ~~1.0~~**3.0** tons per year.

(c) The particulate emissions from LA-35 shall not exceed ~~1.5~~**0.51** pounds per hour and ~~1.0~~**2.2** tons per year.

(d) The particulate emissions from LA-36 shall not exceed ~~1.5~~**0.84** pounds per hour and ~~1.0~~**3.7** tons per year.

(e) The particulate emissions from LA-37 shall not exceed ~~1.5~~**0.10** pounds per hour and ~~1.0~~**0.44** tons per year.

(f) The particulate emissions from LA-38 shall not exceed ~~1.5~~**0.10** pounds per hour and ~~1.0~~**0.44** tons per year.

(g) The total particulate emissions from LA-42A shall not exceed 0.33 pounds per hour and ~~0.7~~**1.4** tons per year.

(h) The total particulate emissions from LA-42B shall not exceed ~~0.09~~**0.9** pounds per hour and ~~0.1~~**3.9** tons per year.

Compliance with these limitations will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration).

Comment 51:

AE Staley requests that Condition D.6.5(a) be modified to reflect per day visible emission notations

rather than per shift. AE Staley requests that this condition be modified so that it would be consistent with recently issued permits from IDEM for AE Staley facilities. In addition, AE Staley operates two shifts at the Lafayette South facility (6:00 am to 6pm and 6pm to 6am). For the second shift, it is not possible to obtain visible emission notations "during normal daylight operations" during winter months. For the remainder of the year, there are only about three hours, at most, during the twelve hour second shift in which to perform the emissions notations. AE Staley believes that monitoring daily visible emissions is more than sufficient to maintain compliance.

Response to Comment 51:

See Response to Comment 23.

Comment 52:

The requirement for quarterly baghouse inspections listed in Condition D.6.7(a) is excessive and should be modified to state annually so that it would be consistent with other baghouse inspection requirements listed in this permit.

Response to Comment 52:

The following changes are consistent with the draft Part 70 permit for another food product processing plant, Bunge (T145-9004-00035). The following changes have been made to the permit as a result of these comments:

D.6.7 Baghouse Inspections

(a) An **external** inspection of all bags, controlling particulate emissions from facilities LA-42A (stack 30A) and LA-42A (stack 30B), shall be performed at least once per calendar quarter. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

(b) An **internal** inspection of all bags, controlling particulate emissions from facilities **LA-42A (stack 30A), LA-42A (stack 30B),** LA-33, LA-34, LA-35, LA-36, LA-37, and LA-38, shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

(c) Inspections shall also be performed whenever the respective baghouse is out of service for more than 24 consecutive hours. All defective bags shall be replaced.

Comment 53:

The requirement for quarterly rotoclone inspections listed in Condition D.6.9 is excessive and should be modified to state annually so that it would be consistent with other inspection requirements listed in this permit. Since the impellers in the rotoclones provide the motive force for air movement through the coal bunkers, any sudden failure of the rotoclone would result in decreased aspiration of the coal bunkers, which would require immediate maintenance in order to maintain belt dryer production capabilities.

Response to Comment 53:

Given that the rotoclones are needed for a purpose other than pollution control, IDEM accepts AE Staleys proposed change. The following change was made in response to this comment:

D.6.9 Rotoclone Inspections

An inspection shall be performed ~~each calendar quarter~~ **at least annually** of all rotocyclones controlling LA-55 and LA-56. Inspections required by this condition shall not be performed in consecutive months.

Comment 54:

AE Staley requests that Condition D.6.11(a) be changed to reflect per day visible emission notations rather than per shift. AE Staley requests that this condition be modified so that it would be consistent with recently issued permits from IDEM for AE Staley facilities. In addition, AE Staley operates two shifts at the Lafayette South facility (6:00 am to 6pm and 6pm to 6am). For the second shift, it is not possible to obtain visible emission notations "during normal daylight operations" during winter months. For the remainder of the year, there are only about three hours, at most, during the twelve hour second shift in which to perform the emissions notations. AE Staley believes that monitoring daily visible emissions is more than sufficient to maintain compliance.

Response to Comment 54:

See Response to Comment 23.

Comment 55:

AE Staley would like to make the following notes/comments regarding the Technical Support Document:

Air Pollution Control Justification as an Integral Part of the Process (Pages 17-18)

Item (a): As explained in AE Staley's general discussion on compliance monitoring requirements for bagfilters, the use of bin vent filters on storage bins is essential to minimize product loss. Without the presence of the bin vent filter, the bin itself could not be utilized since costs associated with fine product and raw material losses exiting with transfer air would be unacceptable. The reason these devices were employed was to minimize product losses rather than to comply with emission control standards. For this reason, they should be considered integral devices and the potential to emit should be determined after the bin vent filters.

Enforcement Issue (Page 18): For the equipment listed in the section of the Technical Support Document entitled Unpermitted Emission Units and Pollution Control Equipment, it should be noted that the Mud Centrifuges (LA-72, LA-73 and LA-74) were eligible for IDEM's "Policy Implementing & Supplementing Title 5 Compliance Transition Program per I.C. 13-10-4-1" dated April 11, 1996. These facilities were constructed prior to January 1, 1994 and satisfied all other factors contained within that policy as documented on page 4 of AE Staley's Part 70 permit application. Therefore, any potential violations involving construction of these sources were previously resolved in accordance with that policy.

Potential to Emit (Pages 19):

Item (c): The South plant facility includes one of the 28 listed source categories (fossil fuel-fired boilers with a combined heat input capacity greater than 250 MMBtu/hr) within the corn wet milling plant. If those boilers are modified, AE Staley agrees that fugitive emissions associated with the operation of the boilers (e.g. coal handling) are to be counted toward determination of PSD applicability. However, there are no other sources

at this plant that are included in the source category list under 326 IAC 2-2-1(y) or that are currently regulated under Sections 111 or 112 of the Clean Air Act. For these other sources at the corn wet milling plant, AE Staley concludes that fugitive emissions are not to be counted towards PSD applicability pursuant to 326 IAC 2-2-1(y)(6) and the definition of stationary source at 326 IAC 2-2-1(kk).

County Attainment Status (pages 22-23)

Item (c): The South plant facility includes one of the 28 listed source categories (fossil fuel-fired boilers with a combined heat input capacity greater than 250 MMBtu/hr) within the corn wet milling plant. If those boilers are modified, AE Staley agrees that fugitive emissions associated with the operation of the boilers (e.g. coal handling) are to be counted toward determination of PSD applicability. However, there are no other sources at this plant that are included in the source category list under 326 IAC 2-2-1(y) or that are currently regulated under Sections 111 or 112 of the Clean Air Act. For these other sources at the corn wet milling plant, AE Staley concludes that fugitive emissions are not to be counted towards PSD applicability pursuant to 326 IAC 2-2-1(y)(6) and the definition of stationary source at 326 IAC 2-2-1(kk).

Response to Comment 55:

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

However, IDEM acknowledges that only the fugitive emissions from those facilities, which fall under '1 of the 28' PSD source categories, should be counted towards the determination of PSD applicability.

Upon further review, IDEM, OAQ made the following changes to the permit. Text with a line through it has been deleted and bold text has been added. The Table of Contents was updated as necessary.

1. Visible emissions and baghouse pressure drop readings should be required once per day for LA-1 and LA-2. Condition D.1.6 has been modified as follows to correct the typographical error.:

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with facilities LA-1 and LA-2, at least once per ~~shift~~ **day** when LA-1 and LA-2 are in operation. When for any one reading or observance, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

2. Condition D.1.7 has been revised to clarify the type of inspections:

D.1.7 Baghouse Inspections

(a) An **internal** inspection of all bags, controlling particulate emissions from facilities LA-1 and LA-2, shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

3. Condition D.3.23(j) has been removed because Condition D.3.23(c) indicates that records of the PMP must be kept.

D.3.23 Record Keeping Requirements

...

~~(j) To document compliance with Condition D.3.6, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

(~~k~~ **j**) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

4. The following changes were made to Condition C.19 Emission Statement as a result of changes made to rule 326 IAC 2-6:

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

(a) **Pursuant to 326 2-6-3(a)(1),** the Permittee shall submit ~~an annual~~ **by July 1 of each year an** emission statement ~~certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4~~ **covering the previous calendar year**. The ~~annual~~ emission statement shall **contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall** meet the following requirements:

(1) Indicate estimated actual emissions of ~~criteria~~ **all** pollutants ~~from the source, in compliance with 326 IAC 2-6 (Emission Reporting)~~ **listed in 326 IAC 2-6-4(a)**;

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) (“Regulated pollutant which is used only for purposes of Section 19 of this rule”) from the source, for purposes of ~~Part 70~~ fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) The ~~annual~~ emission statement 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.

5. In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May, 18 2004, all permits must address the use of credible evidence; otherwise, USEPA will object to the permits. The following language will be incorporated into the permit to address credible evidence:

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

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

issued June 28, 2004
Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	A.E. Staley Manufacturing Company
Source Location:	3300 U.S. 52 South, Lafayette, Indiana, 47905
County:	Tippecanoe
SIC Code:	2046
Operation Permit No.:	T157-6008-00033
Permit Reviewer:	ERG/AO

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from A.E. Staley Manufacturing Company relating to the operation of a stationary corn wet milling plant.

Emission Units and Pollution Control Equipment

The source consists of the following permitted and unpermitted emission units and pollution control devices; see *Unpermitted Emission Units and Pollution Control Equipment* for the unpermitted units: (Note that the maximum process capacities of these units have been included in an OAQ file that is being treated as confidential until a determination has been made and all litigation has been resolved):

(a) Corn Receiving and Handling Area, consisting of:

(1) One (1) Corn Receiving (Corn Unloading Dust Collector), identified as Unit ID LA-1, constructed in 1977, with a baghouse for control, exhausting to stack 1.

(2) One (1) Corn Silo (Elevator Dust Collector), identified as Unit ID LA-2, constructed in 1977, with a baghouse for control, exhausting to stack 2.

(3) Twelve (12) Corn Storage Silos, identified as Unit ID LA-78, constructed in 1977, with no emission control device, exhausting to stack 57.

(b) Corn Steeping and Milling Area, consisting of:

(1) One (1) South Pre-Steep Aspiration, identified as Unit ID LA-62A, constructed in 1995, with no emission control device, exhausting to stack 40.

(2) One (1) North Pre-Steep Aspiration, identified as Unit ID LA-62B, constructed in 1995, with no emission control device, exhausting to stack 41.

(3) One (1) Millhouse Aspiration Process, identified as Unit ID LA-70, constructed in 1977, with a scrubber for control, exhausting to stack 4.

(c) Feed House and Boiler House Area, consisting of:

(1) One (1) natural gas/No. 2 fuel oil fired Zurn Boiler, identified as Unit ID LA-44, constructed in 1977, with a maximum heat input of 227 MMBtu/hr, with no emission control device, exhausting to stack 34.

(2) One (1) coal fired Riley Stoker Boiler, identified as Unit ID LA-45, constructed in 1977, with a maximum heat input of 239 MMBtu/hr, with a multiclone and an electrostatic precipitator for control, exhausting to stack 4.

(3) One (1) natural gas/No. 2 fuel oil fired Cleaver Brooks Boiler, identified as Unit ID LA-46, constructed in 1980, with a maximum heat input of 49 MMBtu/hr, with no emission control device, exhausting to stack 4.

(4) One (1) natural gas/No. 2 fuel oil fired Fiber Pre-Dryer, identified as Unit ID LA-8, constructed in 1977, with a maximum heat input of 58 MMBtu/hr, with an integral product collector/cyclone and a scrubber (ID LA-67) for control, exhausting to stack 4.

(5) One (1) natural gas/No. 2 fuel oil fired DSLC Dryer, identified as Unit ID LA-17A, constructed in 1977, with a maximum heat input of 45 MMBtu/hr, with a scrubber (ID LA-67) and an integral product collector/cyclone for control, exhausting to stack 4.

(6) One (1) natural gas/No. 2 fuel oil fired Gluten Dryer, identified as Unit ID LA-15, constructed in 1995, with a maximum heat input of 52 MMBtu/hr, with a scrubber (ID LA-68), an integral product collector/cyclone and Low NOx Burner for control, exhausting to stack 4.

(7) One (1) Germ RST Pre-Dryer, identified as Unit ID LA-60, constructed in 1995, an integral product collector/cyclone and a scrubber (ID LA-69) for control, exhausting to stack 4.

(8) One (1) natural gas/No. 2 fuel oil fired GR Dryer, identified as Unit ID LA-47, constructed in 1980, with a maximum heat input of 55 MMBtu/hr, with an integral product collector/cyclone and a scrubber (ID LA-69) for control, exhausting to stack 4.

(9) One (1) Germ RST Finish Dryer No.3, identified as Unit ID LA-53, constructed in 1995, with a cyclone (not integral) for control, exhausting to stack 7.

(10) One (1) Feedhouse Aspiration System, identified as Unit ID LA-71, constructed in 1977, with scrubber for control (ID LA-71), exhausting to stack 4.

(11) One (1) Feed Cooler and Cyclone, identified as Unit ID LA-17B, constructed in 1977, with an integral product collector/cyclone and scrubber (ID LA-17B) for control, exhausting to stack 4.

(12) One (1) Cracked Corn to Gr. Conveyor Transfer Cyclone, identified as Unit ID LA-43, constructed in 1977, with an integral product collector/cyclone (ID LA-43) and a scrubber (ID LA-17B) for control, exhausting to stack 4.

(d) Feed Products Storage and Loadout Area, consisting of:

(1) One (1) Corn Cleanings Bin, identified as Unit ID LA-22, constructed in 1977, with a baghouse for control, exhausting to stack 3.

(2) One (1) Gluten Conveyor to Storage/Loadout, identified as Unit ID LA-21, constructed in 1977, with a baghouse for control, exhausting to stack 10.

(3) One (1) Cooled Germ Conveyor to Storage Bin, identified as Unit ID LA-18, constructed in 1977, with a baghouse for control, exhausting to stack 11.

(4) One (1) Gluten Loadout, identified as Unit ID LA-21B, constructed in 2004, with a baghouse for control, exhausting to stack 9.

(5) One (1) Pellet Cooler #1, identified as Unit ID LA-79, constructed in 2004, with a cyclone (not integral) for control, exhausting to stack 58.

(6) One (1) Combo Pellet Cooler, identified as Unit ID LA-63, constructed in 1995, a cyclone (not integral) for control, exhausting to stack 42.

(7) One (1) Pellet Cooler #4, identified as Unit ID LA-80, constructed in 2004, with an cyclone (not integral) for control, exhausting to stack 59.

(8) One (1) Pellet Cooler #5, identified as Unit ID LA-81, constructed in 2004, with an cyclone (not integral) for control, exhausting to stack 60.

(9) One (1) Pellet Storage Bin, identified as Unit ID LA-64, constructed in 1995, with a integral baghouse for control, exhausting to stack 43.

(10) One (1) Hammermill Aspiration Process, identified as Unit ID LA-77, constructed in 2000, with a scrubber for control, exhausting to stack 54.

(11) One (1) Feed Dump Aspiration System, identified as Unit ID LA-83, constructed in 2004, with a baghouse for control, exhausting to stack 62.

(e) Refinery Area, consisting of:

(1) One (1) Mud Centrifuges Vent #1, identified as Unit ID LA-72, constructed in 1977, with no emission control device, exhausting to stack 46.

(2) One (1) Mud Centrifuges Vent #2, identified as Unit ID LA-73, constructed in 1977, with no emission control device, exhausting to stack 47.

(3) One (1) Mud Centrifuges Vent #3, identified as Unit ID LA-74, constructed in 1977, with no emission control device, exhausting to stack 53.

(4) One (1) Jets Foam Trap, identified as Unit ID LA-75, constructed in 1977, with no emission control device, exhausting to stack 48.

(5) One (1) Soda Ash Unloading and Storage, identified as Unit ID LA-29, constructed in 1977, with a scrubber for control, exhausting to stack 19.

(6) Two (2) Hydrochloric Acid Storage Tanks, identified as Unit ID LA-41, constructed in 1977, with a scrubber for control, exhausting to stack 32.

(7) One (1) Hydrochloric Acid Supply Head Tank, identified as Unit ID LA-76, constructed in 1977, with a scrubber for control, exhausting to stack 50.

(8) One (1) Cation IX Drain Tank, identified as Unit ID LA-65A, constructed in 1977, with a scrubber for control, exhausting to stack 51.

(9) One (1) Filter Aid Truck Unloading to West Storage Bin, identified as Unit ID LA-31, constructed in 1977, with a baghouse for control, exhausting to stack 20A.

(10) One (1) Filter Aid Truck Unloading to East Storage Bin, identified as Unit ID LA-31, constructed in 1977, with a baghouse for control, exhausting to stack 20B.

(11) One (1) Filter Aid Transfer from Storage Bins to Weighing Hopper, identified as Unit ID LA-32, constructed in 1993, with a baghouse for control, exhausting to stack 21.

(12) One (1) MBS Aspiration System, identified as Unit ID LA-61, constructed in 1995, with a scrubber for control, exhausting to stack 49.

(13) One (1) natural gas/No. 2 fuel oil fired Carbon Reactivation Furnace, identified as Unit ID LA-28, constructed in 1977, with a maximum heat input of 22 MMBtu/hr, with a scrubber for control, exhausting to stack 33.

(14) One (1) Krystar Dryer/Cooler, identified as Unit ID LA-51, constructed in 1987, with emissions controlled by two integral cyclones/product collectors (53L605) and a wet scrubber (53L606), exhausting to stack 35.

(f) Coal and Ash Storage and Handling Area, consisting of:

(1) One (1) Coal Unloading Building Aspiration System, identified as Unit ID LA-33, constructed in 1977, with a baghouse for control, exhausting to stack 22.

(2) One (1) Crusher and Transfer Building Aspiration System, identified as Unit ID LA-34, constructed in 1977, with a baghouse for control, exhausting to stack 23.

(3) One (1) Coal Storage Silo Top Aspiration System, identified as Unit ID LA–35, constructed in 1977, with a baghouse for control, exhausting to stack 24.

(4) One (1) Coal Storage Silo Bottom Aspiration System, identified as Unit ID LA-36, constructed in 1977, with a baghouse for control, exhausting to stack 25.

(5) One (1) Utility Building Aspiration System #1, identified as Unit ID LA-37, constructed in 1977, with a baghouse for control, exhausting to stack 26.

(6) One (1) Utility Building Aspiration System #2, identified as Unit ID LA-38, constructed in 1977, with a baghouse for control, exhausting to stack 27.

(7) One (1) Coal Silo Aspiration System, identified as Unit ID LA-55, constructed in 1977, with a rotoclone for control, exhausting to stack 28.

(8) One (1) Coal Bunkers Aspiration, identified as Unit ID LA-56, constructed in 1977, with a rotoclone for control, exhausting to stack 29.

(9) One (1) Ash Transfer Aspiration Vacuum Blower #1, identified as Unit ID LA-42A, constructed in 1977, with a baghouse for control, exhausting to stack 30A.

(10) One (1) Ash Transfer Aspiration Vacuum Blower #2, identified as Unit ID LA-42A, constructed in 1977, with a baghouse for control, exhausting to stack 30B.

(11) One (1) Ash Silo Aspiration Air East Vent, identified as Unit ID LA-42B, constructed in 1977, with a dampered vent, exhausting to stack 31A.

(12) One (1) Ash Silo Aspiration Air West Vent, identified as Unit ID LA-42B, constructed in 1977, with a dampered vent, exhausting to stack 31B.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted facilities/units:

(a) One (1) Mud Centrifuges Vent #1, identified as Unit ID LA-72, constructed in 1977, with no emission control device, exhausting to stack 46.

(b) One (1) Mud Centrifuges Vent #2, identified as Unit ID LA-73, constructed in 1977, with no emission control device, exhausting to stack 47.

(c) One (1) Mud Centrifuges Vent #3, identified as Unit ID LA-74, constructed in 1977, with no emission control device, exhausting to stack 53.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new units receiving approval to construct via this Part 70 permit. Note however, that facilities LA-21B, LA-79, LA-80, LA-81, and LA-83 (permitted via SSM 157-16882-00033, issued December 5, 2003) may not be constructed by this time this permit is been issued.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Coal bunker and coal scale exhausts and associated dust collector vents [326 IAC 6-3-2].

(b) Vents from ash transport systems not operated at positive pressure [326 IAC 6-3-2].

(c) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

(d) Structural steel and bridge fabrication activities using 80 tons or less of welding consumables. [326 IAC 6-3-2]

(e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

(f) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO2; 5 lb/hr or 25 lb/day NOx; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

(1) Germ Day Bin, exhausting to stack 61. [326 IAC 6-3-2]

(2) Starch/Gluten Loadout, exhausting to stack 8. [326 IAC 6-3-2]

(3) Salt Storage Tank, exhausting to stack 12. [326 IAC 6-3-2]

(4) Soda Ash Head Tank, exhausting to stack 52. [326 IAC 6-3-2]

(5) Steepwater Finisher Intercondenser Vent (HSW Triple Vent), exhausting to stack 5.

(6) Steepwater Rail Loadout/Unloading (3 railcars stations), exhausting to stack 6.

(7) Steepwater Truck Loadout, exhausting to stack 7.

(8) Light Steepwater Tank #1, exhausting to stack 1.

(9) Starch Tank #3 (West), exhausting to stack 9.

(10) Starch Tank #2 (East), exhausting to stack 10.

(11) Heavy Steepwater Tank #2, exhausting to stack 11.

(12) Light Steep/Heavy SW Surge Water #2, exhausting to stack 2.

(13) Waste Heat Evaporator Vent (Air Ejector Condenser), exhausting to stack 13.

(14) Gluten Slurry Tank, exhausting to stack 14.

(15) Waste Heat Evaporator Hot Water Tank, exhausting to stack 15.

(16) Centrifuge Tanks Vent Fan, exhausting to stack 16.

(17) Centrifuge Supply Tank, exhausting to stack 17.

(18) 6 Line Pre-Thinning Surge and Pre-Thinning Tanks Vent, exhausting to stack 18.

(19) 6 Line Pre-Thin Tank Vent, exhausting to stack 19.

(20) 6 Line Enzyme Liquefaction Reactor (1st stage), exhausting to stack 20.

(21) 6 Line Enzyme Liquefaction Reactor (2nd stage), exhausting to stack 21.

(22) 7 Line Pre-Thinning Surge and Pre-Thinning Tanks Vent, exhausting to stack 22.

(23) 7 Line Pre-Thin Tank Vent, exhausting to stack 23.

(24) 7 Line Enzyme Liquefaction Reactor (1st stage), exhausting to stack 24.

(25) 7 Line Enzyme Liquefaction Reactor (2nd stage), exhausting to stack 25.

(26) Refinery Rotovac - 6 line Filtrate Vacuum Pump, exhausting to stack 26.

(27) Refinery Rotovac - 7 line Filtrate Vacuum Pump, exhausting to stack 27.

(28) Saccharification Tank 10, exhausting to stack 28.

(29) Saccharification Tank 11, exhausting to stack 29.

(30) Pre-Strainer Surge Tank, exhausting to stack 30.

(31) Saccharification Tank 12, exhausting to stack 31.

(32) Saccharification Tank 13, exhausting to stack 32.

(33) Saccharification Tank 14, exhausting to stack 33.

(34) Saccharification Tank 15, exhausting to stack 34.

(35) 68 Finish Evaporator Main Barometric Steam Ejector Vent, exhausting to stack 35.

(36) 68/78 Heat Reclaim SR 95 - 180/205 deg F Heat Exchangers Vents, exhausting to stack 36.

(37) Carbon Furnace Shaft Cooling Air Vent, exhausting to stack 37.

(38) Boiler Water Reclaim Heat Exchangers Vent, exhausting to stack 38.

(39) 75 Syrup Evaporator (MR) Condensate Receiver, exhausting to stack 39.

(40) 65 Syrup Evaporator (MR) Condensate Receiver (vented to 75 tank normally), exhausting to stack 40.

(41) Jet Vapor Condensate Tank & Refinery Steam Condensate Weir, exhausting to stack 41.

(42) 68 & 78 Evaps Noncondes & Hot Well Tank Vent, exhausting to stack 42.

(43) 68 Evap Preheater Heat Reclaim Heat Exchanger Vent, exhausting to stack 43.

(44) Hot Water Tank, exhausting to stack 44.

(45) ISOM (Syrup) Surge Tank, exhausting to stack 45.

(46) 5500 (Syrup) Storage Tank, exhausting to stack 46.

(47) 5500 (Syrup) Storage Tank, exhausting to stack 47.

(48) Resin Tank Scrubber Vent, exhausting to stack 48.

(49) 5500 Steam Condensate Weir, exhausting to stack 49.

(50) Steephouse Syrup Evap MR #1 - Condensate Receiver #1 and 2, exhausting to stack 3.

(51) Starch Vapor Preheater Non Condensibles Vent, exhausting to stack 53.

(52) Starch Preheater Seal Tank, exhausting to stack 54.

(53) Krystar Steam Condensate Weir, exhausting to stack 55.

(54) Krystar Evaporator Non-Condensate Vents, exhausting to stack 56.

(55) South Condenser Vacuum Pump Separator Condenser Vent, exhausting to stack 57.

(56) North Condenser Vacuum Pump Separator Condenser Vent, exhausting to stack 58.

(57) Laboratory Fume Hood Vents (7 total), exhausting to stack 70.

(58) No. 2 Fuel Oil Storage Tank, constructed in 1977, with a capacity of 200,000 gallons, exhausting to stack 60.

(59) Steephouse Process Water Tank, exhausting to stack 4.

(60) Ejector Service Condenser Vents (46L215 & 46L219), exhausting to stack 62.

(61) Vertical Transfer Pump Vent, exhausting to stack 63.

(62) Seed Transfer Pump Vent, exhausting to stack 65.

(63) Fractionation IX Relief Vent, exhausting to stack 66.

(64) Sub IX Relief Vent, exhausting to stack 67.

(65) Crystalline Dextrose Factionization Vacuum Pump, exhausting to stack 68.

(66) Flammable Liquids Storage Vent (laboratory), exhausting to stack 69.

(e) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.

(f) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five tenths (0.5) percent sulfur by weight.

(g) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.

(h) Combustion source flame safety purging on startup.

(i) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(j) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(k) The following VOC and HAP storage containers: Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons; Vessels storing lubricating oils, hydraulic oils, and machining fluids.

(l) Refractory storage not requiring air pollution control equipment.

(m) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(n) Cleaners and solvents characterized as follows:

(1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 ^{0}C (100^{0}F) or;

(2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20^{0}C (68^{0}F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(o) Closed loop heating and cooling systems.

(p) Activities associated with the treatment of wastewater streams with a oil and grease content less than or equal to 1% by volume.

(q) Any operation using aqueous solutions containing less than 1% by weight VOCs excluding HAPs.

(r) Non-contact, forced and induced, draft cooling tower system not regulated under a NESHAP.

(s) Quenching operations used with heat treating processes (quenching of regenerated carbon).

(t) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(u) Heat exchanger cleaning and repair.

(v) Process vessel degassing and cleaning to prepare for internal repairs.

(w) Purging of gas lines and vessels that are related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(x) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(y) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(z) On-site fire and emergency response training approved by the department.

(aa) Diesel generators not exceeding 1600 horsepower.

(bb) Stationary fire pumps.

(cc) Purge double block and bleed valves.

(dd) Filter or coalescer media changeout.

(ee) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(ff) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

Existing Approvals

The source has applied for, constructed, or has been operating under, the following previous approvals:

(a) PC (79) 988, issued July 29, 1976.

(b) PSD 79-1551, issued August 31, 1984.

(c) OP 79-07-89-0340, issued February 5, 1986.

(d) OP 79-07-89-0341, issued February 5, 1986.

(e) OP 79-07-89-0343, issued February 5, 1986.

(f) OP 79-07-89-0344, issued February 5, 1986.

(f) OP 79-07-89-0345, issued February 5, 1986.

(g) PC (79) 1617, issued August 25, 1986.

(h) CP 157-1912-00033, issued November 11, 1990.

(i) CP 157-3581-00033, issued February 27, 1995, amended April 5, 1995.

(j) A 157-5638-00033, issued May 6, 1996 (amendment to CP 157-3581-00033).

(k) SSM 157-11449-00033, issued August 16, 2000.

(l) AA 157-16939-00033, issued March 25, 2003.

(m) MSM 157-16770-00033, issued July 10, 2003.

(n) SSM 157-16882-00033, issued December 5, 2003.

All terms and conditions from previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. This permit supersedes all previous registrations and permits.

The following terms and conditions from previous approvals have been revised in this Part 70 permit:

(a) Condition 9 from CP 157-3581-00033, issued February 27, 1995, and amended May 6, 1996:
The SO_2 emissions from LA-60 shall not exceed 41.7 pounds per hour and the concentration of SO_2 in the exhaust shall not exceed 187 ppm. Compliance with this limit will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable.

Revised condition:
Pursuant to SSM 157-11449-00033, issued August 16, 2000, and CP 157-3581-00033, issued February 27, 1995, the concentration of sulfur dioxide (SO_2) in the exhaust from scrubbers LA-67, LA-68, and LA-69 (controlling emissions from LA-8, LA-17A, LA-15, LA-47 and LA-60) shall not exceed 187 parts per million (ppm). Based on a total exhaust flow rate of 353,600 acfm at 138EF, compliance with this limit is equivalent to total SO_2 emissions of less than 582 pounds per hour and 2,549 tons per year. Compliance with this limit will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable.

Reason revised:
The condition was revised pursuant to SSM 157-11449-00033, issued August 16, 2000 and has been documented here for completeness.

(b) Condition 4 from CP 157-3581-00033, issued on February 27, 1995:
The exhaust grain loading and air flow rate from facilities LA-1A, LA-2A, LA-17B, LA-43, LA-67, LA-68, LA-69, LA-21, LA-28, LA-51, LA-53, and LA-63 shall not exceed the limits provided in order to limit particulate matter emissions. Compliance with these limits will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable.

Revised Condition:
(See table in State Rule Applicability - 326 IAC 2-2 for the specific emission limitations.)

Reason Revised:
The structure of the limits has been changed by: 1) eliminating the grain loading and exhaust air flow rates, and 2) adding the equivalent pound per hour and ton per year limits.

(c) Condition 4, as it pertains to LA-63, from CP 157-3581-00033:
The PM emissions from LA-63 shall not exceed 6.0 lb/ton to the primary cyclone (98% effective) and 29.2 tons per year.

Revised Condition:
The PM/PM10 emissions from LA-63 shall not exceed 0.12 lb/ton (based on pre-control emissions of 6.0 lb/ton and a control efficiency of 98%) and 29.2 tons per year.

Reason Revised:
To clarify that the PM/PM10 emissions, after control, is limited to 0.12 lb/ton (6.0 lb/ton x (1-98%).

(d) Condition 7(j) from PSD 79-1551, issued August 31, 1984:
The total nitrogen oxide (NO_x) emissions from the expansion and existing facilities shall be limited to 2,460 tons per year. Compliance with this limit will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2.

Revised Condition:
Pursuant to PSD 79-1551, issued August 31, 1984, and as revised by this permit, the NO_x emissions from:

(1) LA-45 shall not exceed 101 pounds per hour and 443 tons per twelve consecutive month period.

(2) LA-46 shall not exceed 19.4 pounds per hour and 85 tons per twelve consecutive month period.

(3) LA-8 shall not exceed 22.8 pounds per hour and 100 tons per twelve consecutive month period.

(4) LA-17A shall not exceed 17.8 pounds per hour and 78 tons per twelve consecutive month period.

(5) LA-15 shall not exceed 3.88 pounds per hour and 17 tons per twelve consecutive month period.

(6) LA-47 shall not exceed 21.7 pounds per hour and 95 tons per twelve consecutive month period.

(7) LA-44 shall not exceed 89.2 pounds per hour and 391 tons per year; and

(8) LA-28 shall not exceed 8.67 pounds per hour and 38 tons per year.

Compliance with these limits is equivalent to total NO_x emissions from these facilities of less than 1,247 tons per year and will satisfy the requirements of 326 IAC 2-2.

Reason revised:
PSD 79-1551, issued August 31, 1984 permitted an expansion to the source to increase capacity. The NO_x PTE of this modification exceeded the relevant PSD major threshold so the modification was reviewed pursuant to 40 CFR 52.21 and 326 IAC 2-2. Pursuant to PSD 79-1551, issued August 31, 1984, BACT for NO_x was determined to be: 1) a source-wide NO_x limit of 2,460 tons per year, and 2) coal feed and combustion techniques of excess air control for boiler LA-50. During the Part 70 review process, IDEM determined that the source-wide (as defined by PSD 79-1551) uncontrolled potential to emit NO_x was 2,460 tons per year. Since the issuance of PSD 79-1551, several emission units covered by the 2,460 ton limit have been removed. The aggregate potential to emit NO_x of the existing emission units covered by that limit is 1,247 tons per year. Therefore, the limit was revised to accommodate the removed units and clarify which units are subject. The nature and extent of the BACT limit has not been changed, so this revision is not subject to BACT review. Note that recording keeping and reporting is not required to comply with these limits because they are equivalent to each facility's maximum potential to emit NO_x.

(e) Condition 7(k) from PSD 79-1551, issued August 31, 1984:
The total carbon monoxide (CO) emissions from the expansion and existing facilities shall be limited to 280 tons per year.

Revised Condition:
Pursuant to PSD 79-1551, issued August 31, 1984, and as revised by this permit, the carbon monoxide (CO) emissions from:

(1) LA-45 shall not exceed 4.59 pounds per hour and 20 tons per twelve consecutive month period.

(2) LA-46 shall not exceed 4.11 pounds per hour and 18 tons per twelve consecutive month period.

(3) LA-8 shall not exceed 4.86 pounds per hour and 21 tons per twelve consecutive month period.

(4) LA-17A shall not exceed 3.79 pounds per hour and 17 tons per twelve consecutive month period.

(5) LA-15 shall not exceed 4.36 pounds per hour and 19 tons per twelve consecutive month period.

(6) LA-47 shall not exceed 4.61 pounds per hour and 20 tons per twelve consecutive month period.

(7) LA-44 shall not exceed 19.1 pounds per hour and 84 tons per year; and

(8) LA-28 shall not exceed 1.85 pounds per hour and 8.0 tons per year.

Compliance with these limits is equivalent to total CO emissions from these facilities of less than 208 tons per year and will satisfy the requirements of 326 IAC 2-2.

Reason not incorporated:
PSD 79-1551, issued August 31, 1984 permitted an expansion to the source to increase capacity. The CO PTE of this modification exceeded the relevant PSD major threshold so the modification was reviewed pursuant to 40 CFR 52.21 and 326 IAC 2-2. During the Part 70 review process, IDEM determined that the source-wide (as defined by PSD 79-1551) uncontrolled potential to emit CO was 280 tons per year. Since the issuance of PSD 79-1551, several emission units covered by the 280 ton limit have been removed. The aggregate potential to emit CO of the existing emission units covered by that limit is 208 tons per year. Therefore, the limit was revised to accommodate the removed units and clarify which units are subject. The nature and extent of the BACT limit has not been changed, so this revision is not subject to BACT review. Note that recording keeping and reporting is not required to comply with these limits because they are equivalent to each facility's maximum potential to emit CO.

(f) Condition 4 from CP 157-3581-00033, issued February 27, 1995:
The particulate matter emissions shall be limited as follows: LA-1 (Corn Receiving) shall be limited to a grain loading of 0.01 gr/acf from bag collector at an air flow rate of 22,000 acfm.

The particulate matter emissions shall be limited as follows: LA-2 (Corn Silo) shall be limited to a grain loading of 0.01 gr/acf from bag collector at an air flow rate of 12,000 acfm.

Compliance with these limits shall render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable.

Revised Condition:
The PM/PM10 emissions from LA-1 shall not exceed 1.89 pounds per hour and 8.3 tons per year.

The PM/PM10 emissions from LA-2 shall not exceed 1.03 pounds per hour and 4.5 tons per year.

Reason revised:
The structure of the limit has been changed such that it is more practically enforceable. Note that the magnitude of the allowable emissions has not changed.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this Part 70 permit:

(a) All conditions from previously issued permits pertaining to the following units: LA-3, LA-3A, LA-6, LA-6A, LA-7, LA-7A, LA-16, LA-16A, LA-47A, LA-47B, LA-47C, LA-50, LA-4, LA-4A, LA-5, LA-5A, LA-13, LA-13A, LA-13B, LA-13C, LA-18A, LA-25, LA-25A, LA-25B, LA-30, LA-30A, LA-39, LA-39A, LA-27, LA-9, LA-10, LA-11, LA-12, LA-14, LA-22A, LA-48, LA-48A, and LA-26.

Reason not incorporated:
The units listed have been removed.

(b) Conditions 7 (a), (b), (f), and (i) from PSD 79-1551, issued August 31, 1984:

(a) The maximum operating capacity of boiler LA-50 shall be limited to 240 MMBtu per hour.

(b) The PM emissions from boiler LA-50 shall be limited to 0.1 lb/MMBtu. Compliance shall be achieved with the use of a baghouse with 17,700 square feet of Nomex filter or equivalent, providing a 5 to 1 air-to-cloth ratio, and a pulse jet cleaning system.

(f) The sulfur dioxide emissions from boiler LA-50 shall be limited to 1.6 lb/MMBtu, 480 lb/hr, and 2,102.4 tpy.

(i) The nitrogen oxide emissions from boiler LA-50 shall be limited to 0.7 lb/MMBtu by boiler feed method and combustion techniques of excess air control and over-fired air.

Reason not incorporated:
Boiler LA-50 was never constructed.

(c) Condition 4 from CP 157-3581-00033, issued February 27, 1995:
The particulate matter emissions shall be limited as follows: LA-17B (Feed Cooler) shall be limited to a grain loading of 0.025 gr/acf from primary cyclone at an air flow rate of 30,000 acfm. Compliance with these limits shall render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable.

Reason not incorporated:
Pursuant to OP 79-07-89-0345, issued February 5, 1986 and PSD 79-1551, issued on August 31, 1984, particulate emissions from LA-17B shall be limited to 200 pounds per ton, 3.0 pounds per hour and 13.1 tons per year. Compliance with this more stringent limit will satisfy the requirements of CP 157-3581-00033, issued on February 27, 1995.

(d) Condition 7(l) from PSD 79-1551, issued August 31, 1984:
The total volatile organic compound (VOC) emissions from the expansion and existing

facilities shall be limited to 545 tons per year. Compliance with this limit will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2.

Reason not incorporated:
On August 31, 1984, the source received PSD 79-1551 to authorize the construction of a 239 MMBtu/hr coal-fired boiler (LA-50) and an increase in the production capacity of the entire plant (referred to as the "1984 modification"). According to PSD 79-1551, issued August 31, 1984, the VOC PTE of the entire source, prior to its issuance, was 507 tons per year and the VOC PTE of the 1984 modification was 38 tons per year (for a total of 545 tons per year). Because the VOC PTE of the 1984 modification was less than the relevant PSD threshold of 40 tons per year, the 1984 modification was not reviewed pursuant to the requirements of 40 CFR 52.21 and a VOC limit, equal to the maximum uncontrolled PTE of the source (545 tons of VOC), was included in PSD 79-1551, issued August 31, 1984. New data provided by the source indicates that the VOC emissions from several facilities (product dryers) are significantly higher than previously estimated.

Considering this information, the IDEM, OAQ has concluded that the VOC emissions from several dryers were not accounted for, or inaccurately accounted for, in the PSD permit. Specifically:

(1) The VOC emissions from LA-15, LA-17A, the Millhouse, and Feedhouse were not included in PSD 79-1551 because the emissions from these units were considered insignificant in 1985. However, the current estimated uncontrolled VOC emissions from these units is greater than 300 tons per year.

(2) The VOC emissions from LA-8 and LA-47 were underestimated during the 1985 PSD review process and were believed to be 1.7 and 1.6 tpy, respectively. However, the current estimated uncontrolled VOC emissions from these units is greater than 300 tons per year.

As a result, the VOC PTE of the 1984 modification was greater than (instead of less than) the relevant PSD threshold and VOC emissions should have been reviewed and addressed pursuant to the requirements of 40 CFR 52.21 and 326 IAC 2-2. Once this matter is resolved, the OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 2-2 (PSD) and a schedule for achieving compliance with such requirements. Therefore, the 545 tpy VOC limit has not been incorporated in to the Part 70 permit because a new limit or BACT requirements will be added upon resolution.

(e) Condition 5 from OP 79-07-89-0345, issued on February 5, 1986:
The PM emissions from LA-8 (Gluten Pre-Dryer) shall be limited to 28.2 pounds per hour and 123.5 tons per year. Compliance with this limit will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2.

Reason not incorporated:
Pursuant to A 157-16939-00033, issued March 25, 2003, and SSM 157-11449-00033, issued August 16, 2000, the PM/PM10 emissions from scrubbers LA-67 (which controls emissions from LA-8 and LA-17A), LA-68, and LA-69 shall not exceed a total of 61.12 pounds per hour after controls. Compliance with this more stringent limit will satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and replaces the limit from OP 79-07-89-0345.

(f) Condition 5 from OP 79-07-89-0345, issued on February 5, 1986:
Particulate emissions from LA-28 shall be limited to 0.05 gr/acf, 3.0 pounds per hour and 13.1 tons per year. Compliance with this limit will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2.

Reason not incorporated:
Pursuant to CP 157-3581-00033, issued on February 27, 1995, and as revised by this permit, particulate emissions from LA-28 (Carbon Reactivation Furnace) shall not exceed 0.01 gr/acf, 1.29 pounds per hour, 5.63 tpy. Compliance with this more stringent limit will satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and replaces the limit from OP 79-07-89-0345.

(g) Condition 5 from OP 79-07-89-0345, issued on February 5, 1986.
Particulate emissions from LA-45 (Boiler #2) shall be limited to 0.4 lb/MMBtu, 95.6 pounds per hour and 418.7 tons per year.

Reason not incorporated:
Pursuant to SSM 157-11449-00033, issued August 16, 2000, particulate emissions from LA-45 shall not exceed 0.2 lb/MMBtu heat input. Compliance with this limit will satisfy the requirements of 326 IAC 6-2-3(d) and will provide an emission credit which may be used at a future date pursuant to 326 IAC 2-2.

(h) Condition 4 from CP 157-3581-00033, issued February 27, 1995:
The particulate matter emissions shall be limited as follows: LA-19 (Feed Storage Bin) shall be limited to a grain loading of 0.01 gr/acf from bag collector at an air flow rate of 6,200 acfm. Compliance with these limits shall render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable.

Reason not incorporated:
Pursuant to OP 79-07-89-0345, issued on February 5, 1986, and PSD 79-1551, issued on August 31, 1984, particulate emissions from LA-19 shall be limited to 0.01 gr/acf, 0.24 pounds per hour and 1.0 tons per year. Compliance with this more stringent limit will satisfy the requirements of CP 157-3581-00033, issued on February 27, 1995.

(i) Condition 7(g) from PSD 79-1551, issued August 31, 1984, the sulfur dioxide emissions from LA-17A shall not exceed 1.6 lb/MMBtu when burning No. 6 fuel oil. Compliance with this limit is equivalent to sulfur dioxide emissions of less than 316 tons per year and will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration).

Reason not incorporated:
This limit is superfluous. The source does not use, or keep on-site, No. 6 fuel oil. Only No. 2 fuel oil is used. The maximum uncontrolled SO_2 PTE of LA-17A, while combusting only fuel oil (based on AP-42 emission factors) is 78 tons per year; significantly less than the previously allowable 316 tons per year. In addition, the SO_2 emissions from LA-17A must be controlled by a scrubber pursuant to SSM 157-11449-00033, issued August 16, 2000, and CP 157-3581-00033, issued February 27, 1995.

(k) All conditions pertaining to facilities LA-19, LA-20, LA-23, LA-24, LA-49, and LA-59.

Reason not incorporated:
These units have been removed from the source. Their removal was documented in SSM 157-16882-00033, issued December 5, 2003 and is equivalent to a PM/PM10 reduction of 16.6 ton/yr. See the State Rule Applicability - 326 IAC 2-2 section of this document for more information. The Permittee is not allowed to operate LA-19, LA-20, LA-23, LA-24, LA-49, and LA-59.

Air Pollution Control Justification as an Integral Part of the Process

(a) While under review for a Part 70 permit, the company submitted the following justification that baghouses used as bin vent filters, controlling emissions from LA-18 (stack 11), LA-21(stack 10), LA-22 (stack 3), LA-31(stacks 20A and 20B), LA-32 (stack 21), LA-37

(stack 26) and LA-38 (stack 27) should be considered as an integral part of the milling of wet corn:

At the Lafayette South facility, miscellaneous raw materials (i.e., filter aid, soda ash, etc.) are stored in large storage bins. Each bin is equipped with a bin vent and bin vent filter. The bin vent and bin vent filter are a necessary because their primary purpose is to minimize product loss (bin vent filters have a particulate matter control efficiency of 99.9+%) and neutralize bin pressure during filling, fluidization and emptying of the bin. Without the presence of the bin vent, the bin itself could not be utilized.

IDEM, OAQ has evaluated the justifications and determined that the baghouses used as bin vents are not an integral part of the milling of wet corn. While the bin vents are necessary to neutralize the bin pressure, the bin vent filters are not necessary for operating the process and serve as pollution control. The process is able to operate without the use of the bin vents/filters. Therefore, the permitting level will be determined using the potential to emit before these baghouses used as bin vent filters.

(b) While under review for a Part 70 permit, the company submitted the following justification that the cyclones controlling emissions from LA-60 (stack 4), LA-8 (stack 4), LA-15 (stack 4), LA-17A (stack 4), LA-17B (stack 4), LA-47 (stack 4), LA-43 (stack 4) and LA-51 (stack 35) be considered as an integral part of the milling of wet corn:

Cyclones are used at the Lafayette South facility for product collection and separation of pneumatically conveyed product. The majority of cyclones at the facility are located in the dryer systems and are usually followed in series by a wet scrubber for particulate control. The process can not operate without the use of the cyclones.

IDEM, OAQ has evaluated the justifications and determined that cyclones LA-60 (stack 4), LA-8 (stack 4), LA-15 (stack 4), LA-17A (stack 4), LA-17B (stack 4), LA-47 (stack 4), LA-43 (stack 4) and LA-51 (stack 35) are an integral part of the milling of wet corn. Therefore, the permitting level will be determined using the potential to emit after the cyclones. Since each cyclone located at the source is considered integral to the process, the attached permit does not contain any requirements specific to the operation of the aforementioned cyclones. The determination that these cyclones are integral to the process was made during the Part 70 review process.

(c) Pursuant to SSM 157-16882-00033, issued December 5, 2003, the IDEM, OAQ determined that the baghouse controlling emissions from LA-64 (exhausting to stack 43) is integral to the process.

Enforcement Issue

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 appropriate action.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on May 31, 1996. An updated permit application was received on November 8, 2002.

A notice of completeness letter was mailed to the source on March 11, 1997.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct.

Potential To Emit

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

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	greater than 100
PM-10	greater than 100
SO_2	greater than 100
VOC	greater than 100
CO	greater than 100
NO_x	greater than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Individual HAP	greater than 10
Total HAP	greater than 25

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10, SO_2, VOC, CO and NO_x are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is one of the twenty-eight (28) listed source categories (total heat input boiler capacity of greater than 250 MMBtu/hr) under 326 IAC 2-2, the fugitive emissions are counted toward the determination of PSD applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	377.9
PM-10	377.9
SO_2	1644.2
VOC	450.9
CO	309.8*
NO_x	589

HAP (specify)	not reported

*Actual emissions are greater than the limited potential to emit due to changes in the emission factors.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Limited Potential to Emit* (tons/year)							
Process/facility	PM	PM-10	SO_2	VOC[e]	CO	NO_X	HAPs
Corn Receiving, LA-1	8.3[b]	8.3[b]	0	0	0	0	0
Corn Silo, LA-2	4.5[b]	4.5[b]	0	0	0	0	0
Corn Storage Silos, LA-78	(f)	(f)	0	0	0	0	0
South Pre-Steep Aspiration, LA-62A	0	0	6.0[b]	2.1	0	0	Neg.
North Pre-Steep Aspiration, LA-62B	0	0		2.1	0	0	Neg.
Millhouse Process SO_2 Scrubber Aspiration, LA-70	0	0	56.28[b]	Und.	0	0	0.42
Feedhouse Aspiration System, LA-71	0	0		Und.	0	0	0.4
Natural gas/No. 2 fuel oil fired Zurn Boiler, LA-44	198.9[a]	198.9[a]	1591[a]	7.4	84[c]	391[c]	Neg.
Coal-Fired Riley Stoker Boiler, LA-45	105[c,g]	105[c,g]	6281[i]	2.4	20[c]	443[c]	Neg.
Natural gas/No. 2 fuel oil fired Cleaver Brooks Boiler, LA-46	42.9[a]	42.9[a]	343.4[a,i]	1.6	18[c]	85[c]	Neg.
Natural gas/No. 2 fuel oil fired Fiber Pre-Dryer, LA-8[i]	267.7 [d]	267.7 [d]	2549[d]	Und.	21[c]	100[c]	6.6
Natural gas/No. 2 fuel oil fired DSLC Dryer, LA-17A [g,i]				Und.	17[c]	78[c]	0
Natural gas/No. 2 fuel oil fired Gluten Dryer, LA-15 [h,i]				Und.	19[c]	17[c]	0.9
Germ RST Pre-Dryer, LA-60				Und.	0	0	1.4
Natural gas/No. 2 fuel oil fired GR Dryer, LA-47				Und.	20[c]	95[c]	4.4
Feed Cooler and Cyclone, LA-17B	28.16[b]	28.16[b]	0	0	0	0	0
Cracked Corn to Gr. Conveyor Transfer Cyclone, LA-43				0	0	0	0
Germ RST Finish Dryer No.3, LA-53	18.77[b]	18.77[b]	0	0	0	0	0
Corn Cleanings Bin, LA-22	0.5[a]	0.5[a]	0	0	0	0	0
Gluten Conveyor to Storage/Loadout, LA-21	4.5[b]	4.5[b]	0	0	0	0	0
Cooled Germ Conveyor to Storage Bin, LA-18	1.1[a]	1.1[a]	0	0	0	0	0
Gluten Loadout, LA-21B	1.14[a,l]	1.14[a,l]	0	0	0	0	0
Pellet Cooler #1, LA-79	7.49[a,l]	7.49[a,l]	0	0	0	0	0
Pellet Cooler #4, LA-80	7.49[a,l]	7.49[a,l]	0	0	0	0	0

Limited Potential to Emit* (tons/year)							
Process/facility	PM	PM-10	SO_2	VOC[e]	CO	NO_X	HAPs
Combo Pellet Cooler, LA-63	13.1[a,l]	13.1[a,l b]	0	0	0	0	0
Pellet Storage Bin, LA-64	5.65[a,l]	5.65[a,l]	0	0	0	0	0
Hammermill Aspiration Scrubber, LA-77	4.51[a,l]	4.51[a,l]	0	0	0	0	0
Pellet Cooler #5, LA-81	7.48[a,l]	7.48[a,l]	0	0	0	0	0
Feed Dump Aspiration System, LA-83	4.51[a,l]	4.51[a,l]	0	0	0	0	0
Mud Centrifuges Vent #1, LA-72	0	0	37.0	0	0	0	Neg.
Mud Centrifuges Vent #2, LA-73	0	0	37.0	0	0	0	Neg.
Mud Centrifuges Vent #3, LA-74	0	0	18.0	0	0	0	Neg.
Jets Foam Trap, LA-75	0	0	<40[d, j]	0	0	0	0.68
Soda Ash Unloading and Storage, LA-29	0.3[a]	0.3[a]	0	0	0	0	0
Hydrochloric Acid Storage Tanks, LA-41	0	0	0	0	0	0	0.53
Cation IX Drain Tank, LA-65A	0	0	0	0	0	0	0.18
Hydrochloric Acid Supply Head Tank, LA-76	0	0	0	0	0	0	0.18
Filter Aid Truck Unloading to West Storage Bin, LA-31	0.2[a,b]	0.2[a,b]	0	0	0	0	0
Filter Aid Truck Unloading to East Storage Bin, LA-31			0	0	0	0	0
Filter Aid Transfer from Storage Bins to Weighing Hopper, LA-32	0.1[a]	0.1[a]	0	0	0	0	0
MBS Aspiration System, LA-61	0	0	26.1[b]	0	0	0	0
Natural gas/No. 2 fuel oil fired Carbon Reactivation Furnace, LA-28	5.63[b]	5.63[b]	45.6[a,i]	0.5	8.0[c]	38[c]	0
Krystar Dryer/Cooler, LA-51	3.38[b]	3.38[b]	0	0	0	0	0
Coal Unloading Building Aspiration System, LA-33	1.0[a]	1.0[a]	0	0	0	0	0
Crusher and Transfer Building Aspiration System, LA-34	1.0[a]	1.0[a]	0	0	0	0	0
Coal Storage Silos Top Aspiration System, LA–35	1.0[a]	1.0[a]	0	0	0	0	0
Coal Storage Silos Bottom Aspiration System, LA-36	1.0[a]	1.0[a]	0	0	0	0	0
Utility Building Aspiration System #1, LA-37	1.0[a]	1.0[a]	0	0	0	0	0
Utility Building Aspiration System #2, LA-38	1.0[a]	1.0[a]	0	0	0	0	0
Coal Silo Aspiration System, LA-55	(f)	(f)	0	0	0	0	0
Coal Bunkers Aspiration, LA-56	(f)	(f)	0	0	0	0	0
Ash Transfer Application Vacuum Blower #1, LA-42A (stack 30A)	1.0[a]	1.0[a]	0	0	0	0	0
Ash Transfer Application Vacuum Blower #2, LA-42A (stack 30B)			0	0	0	0	0
Ash Silo Aspiration Air East Vent, LA-42B (stack 31A)	1.0[a]	1.0[a]	0	0	0	0	0

Limited Potential to Emit* (tons/year)							
Process/facility	PM	PM-10	SO_2	VOC[e]	CO	NO_X	HAPs
Ash Silo Aspiration Air West Vent, LA-42B (stack 31B)			0	0	0	0	0
Total Emissions	greater than 100[(k)]	greater than 100[(k)]	6391	greater than 100	207	1244	15.6

* Unless otherwise footnoted, the emissions listed are based on the facility's respective maximum capacity, control efficiency (if applicable), and 8760 hours per year since no federal or 326 IAC limits are applicable.

Neg. = Negligible, that is, emissions less than 0.1 tons per year.

Und. = Undetermined; The IDEM, OAQ has information that indicates that facilities LA-8, LA-15, LA-17A, LA-47, LA-60, LA-70 and LA-71 are subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) with respect to VOC. Once this matter is resolved, the OAQ will, if necessary, promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 2-2 (PSD) and a schedule for achieving compliance with such requirements.

(a) The emissions from these facilities are limited to the indicated values pursuant to operating permit OP 79-07-89-0345 issued on February 5, 1986 in order to satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

(b) The emissions from these facilities are limited to the indicated values pursuant to construction permit CP 157-3581-00033 issued on February 27, 1995 in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

(c) The emissions from these facilities are limited to the indicated values pursuant to PSD 79-1551, issued August 31, 1984, in order to satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

(d) The emissions from these facilities are limited to the indicated values pursuant to A 157-16939-00033, issued March 25, 2003 and SSM 157-11449-00033, issued on August 16, 2000 in order to satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

(e) This facility is not subject to any VOC emission limits. Therefore, the VOC emissions presented are equivalent to the potential to emit after controls.

(f) These facilities are limited pursuant to 326 IAC 6-3-2. The respective PM limits are not listed in this table as the process capacities are confidential.

(g) Pursuant to PSD 79-1551 issued on August 31, 1984 the sulfur dioxide emissions from LA-17A shall not exceed 0.7 lb/MMBtu. This is equivalent to 316 tons per year based on 8760 operating hours per year.

(h) Pursuant to CP 157-3581-00033 issued on February 27, 1995, No. 2 fuel oil consumed by LA-15 shall not exceed 1,662,480 gallons per 12 consecutive month period and the sulfur content of the fuel oil shall not exceed 0.5% sulfur.

(i) The sulfur content of the fuel for this facility has been limited to ensure compliance with the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations). Compliance with this limit will ensure compliance with the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) where applicable.

(j) Pursuant to 326 IAC 2-2 and SSM 157-11449-00033 issued on August 16, 2000, LA-75 shall be limited to 21,000,000 pounds of steam vented per 12 consecutive month period. Compliance with this limit shall limit sulfur dioxide emissions to less than 40 tons per year.

(k) The source-wide potential to emit is expressed as '>100' because the estimated PTE greatly exceeds 100 tons per year.

(l) Pursuant to SSM 157-16882-00033, issued December 5, 2003, these facilities are limited to equivalent lb/hr PM/PM10 emission rates in order to render the requirements of 326 IAC 2-2 not applicable.

County Attainment Status

The source is located in Tippecanoe County.

Pollutant	Status
PM-10	unclassifiable
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	not designated

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Tippecanoe County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Tippecanoe County has been classified as attainment or unclassifiable for PM-10, SO_2, NO_2, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Fugitive Emissions
Since this type of operation is one of the 28 listed source categories under 326 IAC 2-2, the fugitive emissions are counted toward the determination of PSD applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) This source is not subject to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300 Subpart DD) “Standards of Performance for Grain Elevators” since the grain storage capacity of the source is less than 1,000,000 bushels.

(b) The coal fired Riley Stoker Boiler (LA-45), natural gas/No. 2 fuel oil fired Cleaver Brooks Boiler (LA-46) and natural gas/No. 2 fuel oil fired Zurn Boiler (LA-44) are not subject to the requirements of the New Source Performance Standard (NSPS), 326 IAC 12, 40 CFR Part 60, Subpart D (Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971) even though they were constructed after August 17, 1971, because they each have a heat input capacity less than 250 MMBtu/hr.

(c) The coal fired Riley Stoker Boiler (LA-45), natural gas/No. 2 fuel oil fired Cleaver Brooks Boiler (LA-46) and natural gas/No. 2 fuel oil fired Zurn Boiler (LA-44) are not subject to the requirements of the New Source Performance Standard (NSPS), 326 IAC 12, 40 CFR Part 60, Subpart Da (Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After September 18, 1978) because they do not supply electricity to a utility grid and each have a heat input capacity less than 250 MMBtu/hr.

(d) The natural gas/No. 2 fuel oil fired Zurn Boiler (LA-44) and coal fired Riley Stoker Boiler (LA-45) are not subject to the requirements of the New Source Performance Standard (NSPS), 326 IAC 12, 40 CFR Part 60, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units) even though they each have a heat input capacity greater than 100 MMBtu/hr because they were constructed prior to June 19, 1984.

The natural gas/No. 2 fuel oil fired Cleaver Brooks Boiler LA-46 is not subject to the requirements of the New Source Performance Standard (NSPS), 326 IAC 12, 40 CFR Part 60, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units) because it was constructed prior to June 19, 1984 and has a heat input capacity less than 100 MMBtu/hr.

(e) The natural gas/No. 2 fuel oil fired Zurn Boiler (LA-44) and coal fired Riley Stoker Boiler (LA-45) are not subject to the requirements of the New Source Performance Standard

(NSPS), 326 IAC 12, 40 CFR Part 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) because they were each constructed prior to June 9, 1989 and each have a heat input capacity greater than 100 MMBtu/hr.

The natural gas/No. 2 fuel oil fired Cleaver Brooks Boiler (LA-46) is not subject to the requirements of the New Source Performance Standard (NSPS), 326 IAC 12, 40 CFR Part 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) even though it has a heat input capacity greater than 10 MMBtu/hr and less than 100 MMBtu/hr because it was constructed prior to June 9, 1989.

(f) The 200,000 gallon No. 2 fuel oil storage tank is not subject to 40 CFR Part 60, Subpart K (New Source Performance Standards (NSPS) for Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978)) because it is used to store No. 2 fuel oil pursuant to 40 CFR 60.110.

(g) The 200,000 gallon No. 2 fuel oil storage tank is not subject to 40 CFR Part 60, Subpart Ka (New Source Performance Standards (NSPS) for Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After May 19, 1978 and Prior to July 23, 1984)) because it was constructed in 1977.

(h) The 200,000 gallon No. 2 fuel oil storage tank is not subject to 40 CFR Part 60, Subpart Kb (New Source Performance Standards (NSPS) for Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984)) because the tank was constructed prior in 1977.

(i) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

(j) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source because the source is a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) and the source includes one or more units (facilities LA-44, LA-45 and LA-46) that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.

(1) This rule requires the source to:

(A) Submit a Part 1 MACT Application by May 15, 2002; and

(B) Submit a Part 2 MACT Application by April 28, 2004.

(2) The Permittee submitted a Part 1 MACT Application on May 15, 2002. Therefore, the Permittee is required to submit the Part 2 MACT Application on or before May 15, 2004. Note that on April 25, 2002, Earthjustice filed a lawsuit against the US EPA regarding the April 5, 2002 revisions to the rules implementing Section 112(j) of the Clean Air Act. In particular, Earthjustice is challenging the US EPA's 24-month period between the Part 1 and Part 2 MACT Application due dates. Therefore, the Part 2 MACT Application due date may be changed as a result of the suit. Based on a proposed settlement published in the August 26, 2002 *Federal Register*, it appears that US EPA intends to revise the rule so that the due date of the Part 2 MACT Application will be within twelve (12) months after the Permittee submitted the Part 1 MACT application.

(3) Pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ receives the initial notification, any of the following will occur:

(A) If three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ will notify the source that IDEM, OAQ will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or

(B) If less than three years remain on the Part 70 permit term at the time the MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or

(C) The Permittee may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.

(k) This source is subject to the provisions of 40 CFR Part 64, Compliance Assurance Monitoring. In order for this rule to apply, a specific emissions unit must meet three criteria for a given pollutant: 1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and, 3) the unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal or greater than 100 percent of the amount required for a source to be classifies as a major source. Several facilities at this source satisfy these three criteria. However, the Part 70 permit application was originally submitted prior to April 20, 1998; therefore, pursuant to 40 CFR 64.5, the source (and the subject facilities contained therein) is not subject to the rule until such time that the Part 70 permit must be renewed. Note that a CAM plan was submitted to the OAQ on September 1, 1996.

State Rule Applicability - Entire Source

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

The source submitted a Preventive Maintenance Plan (PMP) on September 1, 1996.

326 IAC 2-2 (Prevention of Significant Deterioration)

The source was originally constructed in 1977. Upon promulgation of the PSD rules, the source was an existing PSD major source and belongs to 1 of the 28 PSD source categories (total heat input boiler capacity of greater than 250 MMBtu/hr).

On August 31, 1984, the source received PSD 79-1551 to authorize: the construction of a 239 MMBtu/hr coal-fired boiler (LA-50); and, an increase in the production capacity of the entire plant (hereby referred to as the “1984 modification”). The potential to emit of the 1984 modification exceeded the relevant PSD thresholds for PM, SO_2 and NO_x so the modification was reviewed pursuant to 40 CFR 52.21 and 326 IAC 2-2. The PSD permit included source-wide emission limits for PM, SO_2, NO_x, CO, and VOC. These emission limits were included to quantify

emissions to facilitate the review of future modifications. Note that, except for boiler LA-50, facility-specific PSD limits were not included.

According to PSD 79-1551, issued August 31, 1984, the VOC PTE of the entire source, prior to its issuance, was 507 tons per year and the VOC PTE of the 1984 modification was 38 tons per year (for a total of 545 tons per year). Because the VOC PTE of the 1984 modification was less than the relevant PSD threshold of 40 tons per year, the 1984 modification was not reviewed pursuant to the requirements of 40 CFR 52.21 and a VOC limit, equal to the maximum uncontrolled PTE of the source (545 tons of VOC), was included in PSD 79-1551, issued August 31, 1984. New data provided by the source indicates that the VOC emissions from several facilities (product dryers) are significantly higher than previously estimated.

Considering this information, the IDEM, OAQ has concluded that the VOC emissions from several dryers were not accounted for, or inaccurately accounted for, in the PSD permit. Specifically:

(1) The VOC emissions from LA-15, LA-17A, the Millhouse, and Feedhouse were not included in PSD 79-1551 because the emissions from these units were considered insignificant in 1985. However, the current estimated uncontrolled VOC emissions from these units is greater than 300 tons per year.

(2) The VOC emissions from LA-8 and LA-47 were underestimated during the 1985 PSD review process and were believed to be 1.7 and 1.6 tpy, respectively. However, the current estimated uncontrolled VOC emissions from these units is greater than 300 tons per year.

As a result, the VOC PTE of the 1984 modification was greater than (instead of less than) the relevant PSD threshold and VOC emissions should have been reviewed and addressed pursuant to the requirements of 40 CFR 52.21 and 326 IAC 2-2. Once this matter is resolved, the OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 2-2 (PSD) and a schedule for achieving compliance with such requirements.

Pursuant to PSD 79-1551, issued August 31, 1984, and as revised by this permit (see the Existing Approvals section for details):

(a) The PM emissions from facility LA-22 shall be controlled by baghouses that provide an overall control efficiency of at least 99.9%. (See the review of OP 79-07-89-0345, issued February 5, 1986 for specific emission limitations)

(b) The PM emissions from the expansion and existing facilities shall not exceed 1,243 tons per year. (See the review of OP 79-07-89-0345, issued February 5, 1986 for specific emission limitations)

(c) The SO_2 emissions from the expansion and existing facilities shall not exceed 12,590 tons per year. (See the review of OP 79-07-89-0345, issued February 5, 1986 for specific emission limitations.)

In addition, the NO_x emissions from:

(a) LA-45 shall not exceed 101 pounds per hour and 443 tons per twelve consecutive month period.

(b) LA-46 shall not exceed 19.4 pounds per hour and 85 tons per twelve consecutive month period.

(c) LA-8 shall not exceed 22.8 pounds per hour and 100 tons per twelve consecutive month period.

(d) LA-17A shall not exceed 17.8 pounds per hour and 78 tons per twelve consecutive month period.

(e) LA-15 shall not exceed 3.88 pounds per hour and 17 tons per twelve consecutive month period.

(f) LA-47 shall not exceed 21.7 pounds per hour and 95 tons per twelve consecutive month period.

(g) LA-44 shall not exceed 89.2 pounds per hour and 391 tons per year; and

(h) LA-28 shall not exceed 8.67 pounds per hour and 38 tons per year.

Compliance with these limits is equivalent to total NO_x emissions from these facilities of less than 1,247 tons per year and will satisfy the requirements of 326 IAC 2-2.

In addition, the CO emissions from:

(a) LA-45 shall not exceed 4.59 pounds per hour and 20 tons per twelve consecutive month period.

(b) LA-46 shall not exceed 4.11 pounds per hour and 18 tons per twelve consecutive month period.

(c) LA-8 shall not exceed 4.86 pounds per hour and 21 tons per twelve consecutive month period.

(d) LA-17A shall not exceed 3.79 pounds per hour and 17 tons per twelve consecutive month period.

(e) LA-15 shall not exceed 4.36 pounds per hour and 19 tons per twelve consecutive month period.

(f) LA-47 shall not exceed 4.61 pounds per hour and 20 tons per twelve consecutive month period.

(g) LA-44 shall not exceed 19.1 pounds per hour and 84 tons per year; and

(h) LA-28 shall not exceed 1.85 pounds per hour and 8.0 tons per year.

Compliance with these limits is equivalent to total CO emissions from these facilities of less than 208 tons per year and will satisfy the requirements of 326 IAC 2-2.

On February 5, 1986, the source was issued OP 79-07-89-0340, 79-07-89-0341, 79-07-89-0342 79-07-89-0343, 79-07-89-0344, and 79-07-89-0345. OP 79-07-89-0345 contained specific PM and SO_2 emission limitations for numerous facilities addressed by PSD 79-1551, issued August 31, 1984. Those facility-specific limitations were not included in the PSD permit, are provided below, and will ensure compliance with the source-wide PM and SO_2 limits from PSD 79-1551, issued August 31, 1984.

Pursuant to OP 79-07-89-0345, issued February 5, 1986:

(a) The PM emissions from the following facilities shall be limited as indicated in the table below:

Facility ID	PM Limit (lb/hr)	PM Limit (ton/yr)
LA-44	45.4	198.9
LA-46	9.8	42.9
LA-18	0.26	1.1
LA-29	0.07	0.3
LA-31	0.05	0.2
LA-32	0.03	0.1
LA-33	2.2	1.0
LA-34	2.2	1.0
LA-35	1.5	1.0
LA-36	1.5	1.0
LA-37	1.5	1.0
LA-38	1.5	1.0
LA-22	0.12	0.5
LA-42A	0.33	0.7
LA-42B	0.09	0.1

Compliance with these limits is equivalent to PM emissions of less than 1,243 tons per year.

(b) The SO_2 emissions from the following facilities shall be limited as indicated in the table below:

Facility ID	SO_2 Limit (lb/hr)	SO_2 Limit (ton/yr)
LA-28	10.4	45.6
LA-44	363.2	1590.8
LA-46	78.4	343.4

Compliance with these limits is equivalent to SO_2 emissions of less than 12,590 tons per year.

Compliance with these PM and SO_2 limitations will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention of Significant Deterioration) and ensure compliance with PSD 79-1551, issued August 31, 1984.

On February 27, 1995, the source was issued CP 157-3581-00033 to permit an increase in the plant's production capacity. This modification added and modified several facilities. The following netting analysis was completed such that the modification was not subject to the requirements of 40 CFR 52.21 and 326 IAC 2-2:

Pollutant	PM	PM_{10}	SO_2	VOC	CO	NO_x
PTE of Modification	75.8	74.9	1.8	0.2	2.7	9.2
Contemporaneous emission increases	0	0	0	0	0	0

Contemporaneous emission decreases (from the addition of controls on existing facilities) **	-372.5	-341.7	-87.1	0	0	0
Net Change in Emissions	**-296.7**	**-266.8**	**-85.3**	**0.2**	**2.7**	**9.2**
PSD Significance Level	25	15	40	40	100	40

** The emission reductions were obtained by the removal of several units and the addition of scrubbers LA-67, LA-68, LA-69, LA-70, and LA-71. All contemporaneous emission decreases are federally enforceable because emission limitations, pursuant to CP 157-3581-00033 and 326 IAC 2-2, are included in this permit.

Pursuant to CP 157-3581-00033, issued February 27, 1995 and amended May 6, 1996, and as revised by this permit (see the Existing Approvals section for details):

(a) The PM/PM10 emissions from the following facilities shall be limited as indicated in the table below:

Facility ID	PM/PM10 Limit (lb/hr)	PM/PM10 Limit (tpy)
LA-1	1.89	8.3
LA-2	1.03	4.5
LA-21	1.03	4.5
LA-28	1.29	5.63
LA-43 and LA-17B combined	6.43	28.16
LA-51	0.77	3.38
LA-53	4.29	18.77

(b) The PM/PM10 emissions from LA-63 shall not exceed 0.12 lb/ton (based on pre-control emissions of 6.0 lb/ton and a control efficiency of 98%) and 29.2 tons per year.

(c) The total SO_2 emissions from scrubbers LA-70 and LA-71 (controlling emissions from various insignificant activities in the feedhouse and millhouse, respectively) shall not exceed 12.85 pounds per hour and the concentration of SO_2 in the exhaust from scrubber LA-70 and LA-71 shall not exceed 17 ppm. Compliance with this limit is equivalent to SO_2 emissions of less than 56.3 tons per year.

(d) The SO_2 emissions from LA-61 shall not exceed 5.96 pounds per hour and the concentration of SO_2 in the exhaust shall not exceed 500 ppm. Compliance with this limit is equivalent to SO_2 emissions of less than 26.1 tons per year.

(e) The SO_2 emissions from scrubber LA-62 (controlling emissions from LA-62A and LA-62B) shall not exceed 1.37 pounds per hour. Compliance with this limit is equivalent to SO_2 emissions of less than 6.0 tons per year.

(f) The amount of No. 2 fuel oil consumed by LA-15 shall not exceed 1,662,480 gallons per twelve consecutive month period with compliance determined at the end of each month and the sulfur content of the fuel oil shall not exceed 0.5% sulfur. This limit is based on an uncontrolled AP-42 emission factor of 71 lb SO_2 per kgal oil. Compliance with this limit, including the effect of scrubber LA-68, is equivalent to SO_2 emissions of less than 29.5 tons per year.

(g) The nitrogen oxide (NO_x) emissions from LA-15 shall not exceed 7.59 pounds per hour. Compliance with this limit shall be met with the use of low-NO_x burners and is equivalent to NO_x emissions of less than 33.3 tons per year.

Compliance with these limits shall render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable.

On August 16, 2000, the source was issued SSM 157-11449-00033 to authorize the addition of LA-62C, LA-62D, and LA-77, and increase the plant's production capacity. The following netting analysis was completed such that the modification was not subject to the requirements of 40 CFR 52.21 and 326 IAC 2-2:

Pollutant	PM	PM_{10}	SO_2	VOC	CO	NO_x
PTE of Modification	16.6	16.6	12.1	156.3	0	0
Contemporaneous emission increases (from CP 157-3581-00033)	75.8	74.9	1.8	0.2	2.7	9.2
Contemporaneous emission decreases **	-337.8	307.7	-84.9	-162.8	0	0
Net Change in Emissions	**-245.4**	**-216.2**	**-71**	**-6.3**	**2.7**	**9.2**
PSD Significance Level	25	15	40	40	100	40

** Determination of the emission decreases were clearly documented in Appendix A to SSM 157-11449-00033. All contemporaneous emission decreases are federally enforceable because the emission limitations, pursuant to SSM 157-11449-00033, 326 IAC 2-2, and 326 IAC 8-1-6, are included in this permit.

Pursuant to SSM 157-11449-00033, issued August 16, 2000:

(a) The amount of of steam vented under the alternate operating scenario from LA-75 shall not exceed 21,000,000 pounds per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit is equivalent to an increase in sulfur dioxide (SO_2) emissions of less than 40 tons per year.

(b) The concentration of sulfur dioxide (SO_2) in the exhaust from scrubbers LA-67, LA-68, and LA-69 (controlling emissions from LA-8, LA-17A, LA-15, LA-47 and LA-60 shall not exceed 187 parts per million (ppm). Based on a total exhaust flow rate of 353,600 acfm at 138EF, compliance with this limit is equivalent to total SO_2 emissions of less than 582 pounds per hour and 2,549 tons per year.

(c) The particulate emissions from LA-45 shall not exceed 0.2 pounds per MMBtu heat input. Compliance with this limit will satisfy the requirements of 6-2-3(d) and will provide an emission credit which may be used at a future date pursuant to 326 IAC 2-2.

On July 10, 2003, the source was issued SSM 157-16770-00033 to modify facility LA-51. Pursuant to CP 157-3581-00033, issued February 27, 1995 and amended April 5, 1995, and SSM 157-16770-00033, issued July 10, 2003, the PM/PM10 emissions from LA-51 shall not exceed 0.77 pounds per hour. Compliance with this limit is equivalent to PM/PM10 emissions of less than or equal 3.38 tons per year, will ensure compliance with 326 IAC 6-3-2, and will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

On December 5, 2003, the source was issued SSM 157-16882-00033 to permit the expansion of the existing corn gluten feed pellet operation. The following netting analysis was completed such that the modification was not subject to the requirements of 326 IAC 2-2:

Pollutant	PM	PM_{10}	SO_2	VOC	CO	NO_x
PTE of Modification	37.4	37.4	0	0	0	0
Contemporaneous emission increases (from SSM 157-11449-00033)	16.6	16.6	0	0	0	0
Contemporaneous emission decreases **	-51.3	-51.3	0	0	0	0

Net Change in Emissions	**2.7**	**2.7**	**0**	**0**	**0**	**0**
PSD Significance Level	25	15	40	40	100	40

** Determination of the emission decreases were clearly documented in SSM 157-16882-00033. All contemporaneous emission decreases are federally enforceable because the emission limitations, pursuant to SSM 157-16882-00033 and 326 IAC 2-2 are included in this permit.

Pursuant to SSM 157-16882-00033, issued December 5, 2003, the PM/PM10 emissions shall not exceed the limits listed in the table below:

Unit ID	PM/PM10 emission limit (lb/hr)	PM/PM10 emission limit (ton/yr)
LA-21B	0.26	1.13
LA-63	3.00	13.1
LA-64	1.29	5.65
LA-77	1.03	4.51
LA-79	1.71	7.48
LA-80	1.71	7.48
LA-81	1.71	7.48
LA-83	1.03	4.51

In addition, the Permittee shall shut down units LA-19, LA-20, LA-23, LA-24, LA-49, and LA-59.

Note that the emissions from several facilities are restricted by more than one emission limit from more than one permit pursuant to 326 IAC 2-2 and 40 CFR 52.21. As a result, only the most stringent limitation with respect to 326 IAC 2-2 and 40 CFR 52.21 is included in the permit unless the previous approval justified the increase in the emission limitation. See the Existing Approvals section of this document for details.

326 IAC 2-4.1 (Hazardous Air Pollutants)

(a) Corn Receiving and Handling Area:

Facilities LA-1, LA-2 and LA-78 are not subject to the requirements of 326 IAC 2-4.1 because they were constructed before July 27, 1997 and do not have the potential to emit HAPs.

(b) Corn Steeping and Milling Area:

Facilities LA-62A, LA-62B and LA-70 are not subject to the requirements of 326 IAC 2-4.1 because they were constructed before July 27, 1997 and have the potential to emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of any combination of HAPs.

Facilities LA-62C and LA-62D are not subject to the requirements of 326 IAC 2-4.1 even though they were constructed after July 27, 1997 because they have the potential to emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of any combination of HAPs.

(c) Feed House and Boiler House Area:

Facilities LA-17A, LA-17B, LA-43 and LA-53 are not subject to the requirements of 326 IAC 2-4.1 because they were constructed before July 27, 1997 and do not have the potential to emit HAPs.

Facilities LA-8, LA-15, LA-60, LA-47, LA-71, LA-44, LA-45 and LA-46 are not subject to the requirements of 326 IAC 2-4.1 because they were constructed before July 27, 1997 and have the potential to emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of any combination of HAPs.

(d) Feed Products Storage and Loadout Area:

Facilities LA-22, LA-21, LA-18, and LA-64 are not subject to the requirements of 326 IAC 2-4.1 because they were constructed before July 27, 1997 and do not have the potential to emit HAPs.

Facilities LA-63, LA-77, LA-21B, LA-79, LA-80, LA-81, and LA-83 are not subject to the requirements of 326 IAC 2-4.1 even though they were constructed after July 27, 1997 because they do not have the potential to emit HAPs.

(e) Refinery Area

Facilities LA-29, LA-31(stack 20A), LA-31(stack 20B), LA-32, LA-61, LA-28 and LA-51 are not subject to the requirements of 326 IAC 2-4.1 because they were constructed before July 27, 1997 and do not have the potential to emit HAPs.

Facilities LA-41, LA-76, LA-65A, LA-72, LA-73, LA-74, and LA-75 are not subject to the requirements of 326 IAC 2-4.1 because they were constructed before July 27, 1997 and have the potential to emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of any combination of HAPs.

(f) Coal and Ash Storage and Handling Area:

Facilities LA-33, LA-34, LA-35, LA-36, LA-37, LA-38, LA-55, LA-56, LA-42A (stack 30A), LA-42A (stack 30B), LA-42B (stack 31A) and LA-42B (stack 31B) are not subject to the requirements of 326 IAC 2-4.1 because they were constructed before July 27, 1997 and do not have the potential to emit HAPs.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM-10, SO_2, VOC, NO_x, and CO. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

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:

(a) Opacity shall not exceed an average of forty percent (40%) 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.

326 IAC 6-4 (Fugitive Dust)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to the requirements of 326 IAC 6-5 because it is not located in an area listed in 326 IAC 6-5-1(a), and does not contain any facilities with the potential to emit fugitive PM greater than 25 tons per year which received a preconstruction approval after December 13, 1985.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The source has the potential to emit greater than 100 tons of VOC per year and commenced operation after October 7, 1974 and before January 1, 1980. However, VOC emissions do not result from the use of organic solvents; instead, they are byproducts from starch processing. Therefore, pursuant to 326 IAC 8-6-2(a), this source is not subject to the provisions of this rule.

326 IAC 9 (Carbon Monoxide Emission Limits)

Pursuant to 326 IAC 9 (Carbon Monoxide Emission Limits), the source is subject to this rule because it is a stationary source which emits CO and commenced operation after March 21, 1972. However, under this rule, there are no specific CO emission limitations because the source is not an operation listed under 326 IAC 9-1-2.

State Rule Applicability - Corn Receiving and Handling Area - Facilities LA-1, LA-2 and LA-78

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from facilities LA-1, LA-2 and LA-78 shall be limited using one of the following equations (as applicable):

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

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

Or depending on the process weight rate:

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

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

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughputs of the respective facilities are being treated as confidential until a determination has been made and all litigation has been resolved. The control equipment shall be in operation at all times the facilities are in operation in order to comply with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Facilities LA-1, LA-2 and LA-78 are not subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because they do not have the potential to emit SO_2.

326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT)

Facilities LA-1, LA-2 and LA-78 are not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) because they do not have the potential to emit VOC.

State Rule Applicability - Corn Steeping and Milling Area - Facilities LA-62A, LA-62B, LA-62C, LA-62D and LA-70

326 IAC 6 (Particulate Matter)

Facilities LA-62A, LA-62B, LA-62C, LA-62D and LA-70 are not subject to the requirements of 326 IAC 6 because they are not sources of particulate emissions.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Facilities LA-62A, LA-62B, LA-62C and LA-62D are not subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because they do not have the potential to emit SO_2.

Facility LA-70 is subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because it has a potential to emit greater than 25 tons per year of SO_2. However, facility LA-70 is not a combustion source; therefore, there are no applicable limitations pursuant to 326 IAC 7-1.1-2.

326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT)

Facilities LA-62A, LA-62B, LA-62C and LA-62D are not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) even though they were constructed after January 1, 1980 because they each have potential VOC emissions of less than twenty-five (25) tons per year.

Facility LA-70 is not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) even though it has potential VOC emissions greater than twenty-five (25) tons per year because it was constructed prior to January 1, 1980.

State Rule Applicability - Feed House and Boiler House Area - Facilities LA-45, LA-46, LA-8, LA-17A, LA-17B, LA-15, LA-60, LA-47, LA-71, LA-43, LA-44 and LA-53

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

(a) Facilities LA-44, LA-45 and LA-46 are not subject to the requirements of 326 IAC 6-3-2 because they are subject to the requirements of 326 IAC 6-2-3 (Indirect Heating).

Facility LA-71 is not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because it does not have the potential to emit particulate.

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from facilities LA-8, LA-17A, LA-17B, LA-15, LA-60, LA-47, LA-43 and LA-53 shall be limited using one of the following equations (as applicable):

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

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

Or depending on the process weight rate:

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

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

(b) Pursuant to AA 157-16939-00033 issued on March 25, 2003 and SSM 157-11449-00033 issued on August 16, 2000 particulate matter emissions from LA-67, LA-68 and LA-69 (controlling emissions from LA-8, LA-17A, LA-15, LA-47 and LA-60) shall be limited to a

total of 61.12 pounds per hour after controls. Compliance with this limit will satisfy 326 IAC 6-3-2.

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughputs of the respective facilities are being treated as confidential until a determination has been made and all litigation has been resolved. The control equipment shall be in operation at all times the facilities are in operation in order to comply with 326 IAC 6-3-2.

326 IAC 6-2-3 (Particulate Matter- Sources of Indirect Heating)

Boilers LA-44, LA-45 and LA-46 are subject to the requirements of 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) because the source is located in Tippecanoe County and each boiler was constructed prior to September 21, 1983. Pursuant to this rule, the particulate matter (PM) emissions from boilers LA-44, LA-45 and LA-46 shall not exceed the pound per million Btu limit calculated using the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where $C = 50\ u/m^3$
Pt = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu)
Q = total source maximum operating capacity rating (Q = 515 MMBtu/hr)
N = number of stacks (N = 1)
a = plume rise factor (a = 0.67)
h = stack height (h = 250 ft for Boilers LA-45 and LA-46; h = 180 ft for Boiler LA-44)

Pt equals 1.01 lb/MMBtu for each Boiler LA-45 and LA-46. Pt equals 0.73 lb/MMBtu for Boiler LA-44. However, pursuant to 326 IAC 6-2-3(e), any facility subject to the requirements of this rule shall not emit greater than 0.6 pounds per MMBtu heat input.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Facilities LA-17B, LA-43 and LA-53 are not subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because they do not have the potential to emit SO_2.

Facility LA-44 is not subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because it has the potential to emit less than 25 tons per year of SO_2.

Facilities LA-8, LA-15, LA-17A, LA-45, LA-46, LA-47, LA-60 and LA-71 are subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because they have the potential to emit greater than 25 tons per year of SO_2. Facilities LA-60 and LA-71 are not combustion sources; therefore, there are no applicable limitations pursuant to 326 IAC 7-1.1-2. Pursuant to 326 IAC 7-1.1-2(a)(3) sulfur dioxide emissions from facilities LA-8, LA-15, LA-17A, LA-46 and LA-47 shall each be limited to five-tenths (0.5) pounds per million Btu (MMBtu), when combusting No. 2 fuel oil. Pursuant to 326 IAC 7-1.1-2(a)(1) sulfur dioxide emissions from facility LA-45 shall be limited to six and zero tenths (6.0) pounds per million Btu (MMBtu), when combusting coal.

The sulfur content of the fuel oil combusted in LA-46 shall not exceed forty-five hundredths percent (0.45 %). Compliance with this limit is equivalent to SO_2 emissions of 0.5 pounds per MMBtu, will satisfy the requirements of 326 IAC 7-1.1, and will ensure compliance with the limit from OP 79-07-89-0345, issued February 5, 1986.

326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT)

Facilities LA-8 is not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) because it was constructed prior to January 1, 1980.

Facilities LA-17A and LA-47 are not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) even though they have potential emissions greater than 25 tons per year VOC because they were constructed prior to January 1, 1980.

Facilities LA-17B and LA-43 are not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) because they do not have the potential to emit VOC.

Facility LA-44 is not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) because it was constructed prior to January 1, 1980 and has potential emissions less than 25 tons per year of VOC.

Facilities LA-45 and LA-46 are not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) because they each have potential emissions less than 25 tons per year of VOC.

Facility LA-53 is not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) because it does not have the potential to emit VOC.

LA-15 and LA-60 were constructed after January 1, 1980 and each have the potential to emit greater than 25 tons of VOC per year. Therefore, they are subject to the requirements of 326 IAC 8-1-6. Pursuant to SSM 157-11449-00033, issued August 16, 2000 and 326 IAC 8-1-6, the VOC emissions from facilities LA-15 and LA-60 shall be controlled by wet scrubbers, determined to be BACT, having at least forty five percent (45%) overall VOC control efficiency.

Facility LA-71 is not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) because it has potential emissions less than 25 tons per year of VOC and is used to control emissions from miscellaneous feedhouse process equipment.

326 IAC 10-4 (NO_x Budget Trading Program)

Boilers LA-44, LA-45 and LA-46 and Dryers LA-8, LA-17A, LA-15, LA-60, LA-47 and LA-53 are not subject to the requirements of 326 IAC 10-4-1 (NO_x Budget Trading Program) because they are not “large affected units” as defined in 326 IAC 10-4-2(27). Facilities LA-44, LA-45, LA-46, LA-8, LA-17A, LA-15, LA-60, LA-47 and LA-53 are not “large affected units” because they do not have a maximum design heat input greater than two hundred fifty million (250,000,000) Btu per hour.

State Rule Applicability - Feed Products Storage and Loadout Area - Facilities LA-22, LA-21, LA-18, LA-63, LA-64, LA-77, LA-21B, LA-79, LA-80, LA-81, and LA-83

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

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from facilities LA-22, LA-21, LA-18, LA-63, LA-64, LA-77, LA-21B, LA-79, LA-80, LA-81, and LA-83 shall be limited using one of the following equations (as applicable):

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

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

Or depending on the process weight rate:

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

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

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughputs of the respective facilities are being treated as confidential until a determination has been made and all litigation has been resolved. The control equipment shall be in operation at all times the facilities are in operation in order to comply with 326 IAC 6-3-2.

326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT)

Facilities LA-18, LA-21, LA-22, LA-63, LA-64, LA-77, LA-21B, LA-79, LA-80, LA-81, and LA-83 are not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) because they do not have the potential to emit VOC.

State Rule Applicability - Refinery Area - Facilities LA-72, LA-73, LA-74, LA-75, LA-29, LA-41, LA-76, LA-65A, LA-31(stack 20A), LA-31(stack 20B), LA-32, LA-61, LA-28 and LA-51.

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

Facilities LA-72, LA-73, LA-74, LA-75, LA-41, LA-76, LA-65A and LA-61 are not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because they do not have the potential to emit particulate matter.

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from facilities LA-29, LA-31(stack 20A), LA-31(stack 20B), LA-32, LA-28 and LA-51 shall be limited using one of the following equations (as applicable):

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

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

Or depending on the process weight rate:

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

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

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughputs of the respective facilities are being treated as confidential until a determination has been made and all litigation has been resolved. The control equipment shall be in operation at all times the facilities are in operation in order to comply with 326 IAC 6-3-2.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Facilities LA-29, LA-41, LA-76, LA-65A, LA-31(stack 20A), LA-31(stack 20B), LA-32 and LA-51 are not subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because they do not have the potential to emit SO_2.

Facility LA-74 is not subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because it has the potential to emit less than 25 tons per year of SO_2.

Facilities LA-72, LA-73, LA-75, LA-61 and LA-28 are subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because they have the potential to emit greater than 25 tons per year of SO_2. Facilities LA-72, LA-73, LA-75 and LA-61 are not combustion sources; therefore, there are no applicable limitations pursuant to 326 IAC 7-1.1-2. Facility LA-28 has the capability to combust natural gas and No. 2 fuel oil.

Pursuant to 326 IAC 7-1.1-2(a)(3), the sulfur dioxide (SO_2) emissions from LA-28 shall not exceed 0.5 pounds per MMBtu heat input when combusting #2 fuel oil.

326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT)

Facilities LA-29, LA-65A, LA-31(stack 20A), LA-31(stack 20B) and LA-32 are not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) because they were constructed prior January 1, 1980 and do not have the potential to emit VOC.

Facilities LA-28, LA-72, LA-73, LA-74, LA-75 and LA-76 are not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) because they were constructed prior to January 1, 1980 and each have potential emissions of less than 25 tons per year VOC.

Facilities LA-41, LA-61 and LA-51 are not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) because they do not have the potential to emit VOC.

326 IAC 10-4 (NO_x Budget Trading Program)

Furnace LA-28 is not subject to the requirements of 326 IAC 10-4-1 (NO_x Budget Trading Program) because it is not a “large affected unit” as defined in 326 IAC 10-4-2(27). LA-28 is not a “large affected unit” because it does not have a maximum design heat input greater than two hundred fifty million (250,000,000) Btu per hour.

State Rule Applicability - Coal and Ash Storage and Handling Area - Facilities LA-33, LA-34, LA-35, LA-36, LA-37, LA-38, LA-55, LA-56, LA-42A (stack 30A), LA-42A(stack 30B), LA-42B (stack 31A) and LA-42B (stack 31B)

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

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from facilities LA-33, LA-34, LA-35, LA-36, LA-37, LA-38, LA-55, LA-56, LA-42A (stack 30A), LA-42A (stack 30B), LA-42B (stack 31A) and LA-42B (stack 31B) shall be limited using one of the following equations (as applicable):

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

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

Or depending on the process weight rate:

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

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

Note that the specific 326 IAC 6-3-2 limits have not been listed here as the process throughputs of the respective facilities are being treated as confidential until a determination has been made and all litigation has been resolved. The control equipment shall be in operation at all times the facilities are in operation in order to comply with 326 IAC 6-3-2.

326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT)

Facilities LA-33, LA-34, LA-35, LA-36, LA-37, LA-38, LA-55, LA-56, LA-42A (stack 30A), LA-42A (stack 30B), LA-42B (stack 31A) and LA-42B (stack 31B) are not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) because they do not have the potential to emit VOC.

State Rule Applicability - Specifically Regulated Insignificant Activities

326 IAC 6-3-2 (Particulate)

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the insignificant ash transport system vents, coal bunker, coal scale exhausts, brazing, cutting, soldering, welding,

steel and bridge fabrication activities, germ day bin, starch/gluten loadout, salt storage tank, and soda ash head tank shall be limited using the following equation:

Those activities with a process weight rate of less than 100 pounds per hour shall be limited to 0.551 pounds per hour;

Or depending on the process weight rate:

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

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

326 IAC 12 (New Source Performance Standards)

The 100,000 gallon No.2 fuel oil storage tank is not subject to 326 IAC 12 (New Source Performance Standards (NSPS) because the tank was constructed prior to July 23, 1984.

Testing Requirements

(a) All of the facilities listed as part of the Corn Receiving and Handling Area operations have the potential to emit only PM/PM10. The PM/PM10 emissions from any one facility do not account for a significant portion of the source's potential to emit PM/PM10. Compliance with 40 CFR 52.21, 326 IAC 2-2, and 326 IAC 6-3-2 is expected with the use of the baghouses and scrubbers. Compliance monitoring of the control devices will ensure compliance with the applicable emission limitations. Therefore, no testing is required for any facilities listed as part of the Corn Receiving and Handling Area.

(b) All of the facilities listed as part of the Corn Steeping and Milling Area operations have the potential to emit only SO_2. The SO_2 emissions from any one facility do not account for a significant portion of the source's potential to emit SO_2. Compliance with 40 CFR 52.21 and 326 IAC 2-2 is expected with the use of the scrubbers. Compliance monitoring of the control devices will ensure compliance with the applicable emission limitations. Therefore, no testing is required for any facilities listed as part of the Corn Steeping and Milling Area.

(c) Pursuant to SSM 157-11449-00033, issued August 16, 2000, the Permittee had to test LA-67, LA-68, and LA-69 no later than 36 months following the issuance of that permit. The required testing was completed on May 19, 2003. These tests must be repeated al least every five years. As a result:

> Pursuant to SSM 157-11449-00033, issued August 16, 2000, the Permittee shall perform PM, PM_{10}, VOC, and SO_2 testing on LA-67, LA-68, and LA-69 no later than May 19, 2008, utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

(d) Pursuant to SSM 157-16882-00033, issued December 5, 2003, and SSM 157-11449-00033, issued August 16, 2000, within 60 days of achieving maximum production rate, but no later than 180 days after the initial startup of LA-63, the Permittee shall perform PM testing for LA-63 utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing.

(e) The facilities listed as part of the Refinery Area operations are subject to the requirements of 326 IAC 7-1.1, 326 IAC 6-3-2, 40 CFR 52.21 and 326 IAC 2-2. Compliance with the applicable limitations is expected with the use of baghouses and scrubbers. Compliance monitoring of the control devices will ensure compliance with the applicable emission

limitations. Therefore, no testing is required for any facilities listed as part of the Refinery Area.

(f) All of the facilities listed as part of the Coal and Ash Storage and Handling Area operations have the potential to emit only PM/PM10. The PM/PM10 emissions from any one facility do not account for a significant portion of the source's potential to emit PM/PM10. Compliance with 40 CFR 52.21, 326 IAC 2-2, and 326 IAC 6-3-2 is expected with the use of the baghouses and cyclones. Compliance monitoring of the control devices will ensure compliance with the applicable emission limitations. Therefore, no testing is required for any facilities listed as part of the Coal and Ash Storage and Handling Area.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

1. The facilities located in the Corn Receiving and Handling Area (LA-1, LA-2 and LA-78) have applicable compliance monitoring conditions as specified below:

   (a) Visible emission notations of LA-1 and LA-2 stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. 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. 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. 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

   (b) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with facilities LA-1 and LA-2, at least once per day when LA-1 and LA-2 are in operation. When for any one reading or observance, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee

shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(c) An inspection of all bags, controlling particulate emissions from facilities LA-1 and LA-2, shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced. Inspections shall also be performed whenever the respective baghouse is out of service for more than 24 consecutive hours. All defective bags shall be replaced.

(d) In the event that bag failure has been observed:

(1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it has been 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.

(2) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have 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).

These monitoring conditions are necessary because the baghouses must operate properly to ensure compliance with 326 IAC 2-2 and 326 IAC 6-3-2.

Compliance monitoring (visible emission notations) for LA-78 is not required because the emissions from LA-78 are sufficiently low.

2. The facilities located in the Corn Steeping and Milling Area (LA-62A, LA-62B, LA-62C, LA-62D and LA-70) have applicable compliance monitoring conditions as specified below:

(a) The Permittee shall monitor the pH of the scrubbing liquid, scrubber recirculation rate, and exhaust air stream pressure drop at least once per shift from the scrubber controlling emissions from LA-70 during normal operation. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when the pH, flow rate, and pressure drop readings are outside of the respective normal ranges, as specified by the manufacturer, for any one reading. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit. The instruments used for determining the pH, flow rate, and pressure drop shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(b) An inspection of the scrubber controlling emissions from LA-70 shall be performed semi-annually. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.

(c) In the event that a scrubber malfunction has been observed:

(1) The affected unit will be shut down immediately in accordance with safe operating procedures until the failed unit has been repaired or the appropriate components replaced".

(2) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

These monitoring conditions are necessary because the scrubber must operate properly to ensure compliance with 326 IAC 2-2 and 326 IAC 6-3-2.

3. The facilities located in the Feedhouse and Boilerhouse Area (LA-45, LA-46, LA-8, LA-17A, LA-17B, LA-15, LA-60, LA-47, LA-71, LA-43, LA-44 and LA-53) have applicable compliance monitoring conditions as specified below:

(a) Visible emission notations of the exhaust from stacks 4 and 7 (exhausting emissions from facilities LA-8, LA-17A, LA-17B, LA-15, LA-60, LA-47, LA-43, LA-46 and LA-53) shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. Visible emission notations of the exhaust from stack 34 (exhausting emissions from LA-44) shall be performed once per shift during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal. 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. 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. 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(b) An inspection shall be performed each calendar quarter of the cyclone controlling LA-53. Inspections required by this condition shall not be performed in consecutive months.

(c) In the event that cyclone failure has been observed failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. 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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(d) The Permittee shall monitor the pH of the recycled water from scrubbers LA-67, LA-68, and LA-69 at least once per hour during normal operation. The pH shall not be less than 5.0 for any one reading and not less than 7.0 based on a twelve-reading average determined at least once per shift. The Permittee shall monitor the pH of the recycled water from scrubber LA-71 at least once per hour during normal operation. The pH shall not be less than 5.0 for any one reading and not less than 7.0 based on a twelve-reading average determined at least once per shift. The Permittee shall monitor the scrubbant flow rate of the gaseous and particulate sections of scrubber LA-67 at least once per hour during normal operation. The scrubbant flow rates for the gaseous and particulate sections of LA-67 shall not average less than 1000 gallons per minute and 200 gallons per minute, respectively, based on a twelve-reading average determined at least once per shift. The Permittee shall monitor the scrubbant flow rate of the gaseous and particulate sections of scrubber LA-68 at least once per hour during normal operation. The scrubbant flow rates shall not average less than 200 gallons per minute based on a twelve-reading average determined at least once per shift. The Permittee shall monitor the scrubbant flow rate of the gaseous and particulate sections of scrubber LA-69 at least once per hour during normal operation. The scrubbant flow rates for the gaseous and particulate sections of LA-69 shall not average less than 500 gallons per minute and 100 gallons per minute, respectively, based on a twelve-reading average determined at least once per shift. The Permittee shall monitor the scrubbant flow rate of scrubber LA-17B at least once per hour during normal operation. The scrubbant flow rate shall not average less than 175 gallons per minute based on a twelve-reading average determined at least once per shift. The Compliance Response Plan for the scrubbers shall contain troubleshooting contingency and corrective actions for when the pH and flow rate readings are outside of the specified ranges for any one reading. A pH or flow rate reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit. The instruments used for determining the pH and flow rates shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(e) Pursuant to SSM 157-11449-00033, issued August 16, 2000, an inspection of the scrubbers controlling emissions from LA-8, LA-17A, LA-17B, LA-15, LA-60, LA-47, LA-71 and LA-43 shall be performed at least once per year. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.

(f) In the event that a scrubber malfunction has been observed:

(1) The affected unit will be shut down immediately in accordance with safe operating procedures until the failed unit has been repaired or the appropriate components replaced".

(2) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

(g) The ability of the multiclone to control particulate emissions from LA-45 shall be monitored at least once per shift, when the unit is in operation, by measuring and recording the total static pressure drop across the multiclone. Pressure drop monitoring equipment shall be installed in accordance with Section C - Compliance Monitoring. Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the static pressure drop is outside of the normal operating range for the corresponding boiler steam load. A pressure drop reading that is outside normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.

(h) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), and 326 IAC 2, a continuous monitoring system shall be installed, calibrated, maintained, and operated to measure the opacity of the exhaust from boiler LA-45. The continuous opacity monitoring system shall meet the performance specifications of 326 IAC 3-5-2. The ability of the continuous opacity monitor (COM) to monitor particulate emissions from boiler LA-45 shall be monitored by continuously measuring and recording the opacity of emissions from the stack exhaust. Appropriate response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the opacity from the boiler exceeds thirty-eight percent (38%) for any two consecutive six-minute average period. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(i) Whenever a continuous opacity monitor (COM) is malfunctioning, the Permittee shall follow the procedures in accordance with Section C - Maintenance of Opacity Monitoring Equipment, until such time that the continuous opacity monitor is back in operation. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed or whenever the opacity from a boiler exceeds thirty-eight percent (38%) for any two consecutive six-minute average periods. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the scrubbers, cyclones, multiclone and electrostatic precipitator must operate properly to ensure compliance with 326 IAC 2-2, 326 IAC 6-3-2 and 326 IAC 7-1.1.

4. The facilities located in the Feed Products Storage and Loadout Area (LA-22, LA-21, LA-18, LA-63, LA-64, LA-77, LA-21B, LA-79, LA-80, LA-81, and LA-83) have applicable compliance monitoring conditions as specified below:

(a) Pursuant to SSM 157-16882-00033, issued December 5, 2003, visible emission notations of the stack exhaust from LA-22, LA-21, LA-18, LA-21B, LA-63, LA-64, LA-79, LA-80, LA-81, and LA-83 shall be performed once per day during normal

daylight operations. A trained employee shall record whether emissions are normal or abnormal. Visible emission notations of the stack exhaust from LA-77 shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. 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. 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. 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(b) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with LA-22, LA-21, LA-18, and LA-64, at least once per day when these facilities are in operation. When for any one reading or observance, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(c) Pursuant to SSM 157-16882-00033, issued December 5, 2003, an inspection of all bags, controlling particulate emissions from facilities LA-22, LA-21, LA-18, LA-64, LA-21B, and LA-83 shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced. An inspection shall be performed at least once per calendar year for all cyclones controlling pellet coolers (LA-63, LA-79, LA-80, and LA-81). Inspections required by this condition shall be performed t least six (6) months apart. Inspections shall also be performed whenever the respective baghouse or cyclone is out of service for more than 24 consecutive hours. All defective bags shall be replaced.

(d) Pursuant to SSM 157-16882-00033, issued December 5, 2003, the Permittee shall monitor and record the pressure drop and flow rate from the scrubber controlling emissions from LA-77, at least once per shift, when the respective facility is in operation. When, for any one reading, the pressure drop across the scrubber is outside the normal range of 1.5 and 3.0 inches of water, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. When for any one reading, the flow rate is less than the normal range of 25 gallons per minute, or a minimum rate established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading or flow rate that is outside the above mentioned ranges, is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports,

shall be considered a deviation from this permit. The instrument used for determining the flow rate shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(e) Pursuant to SSM 157-16882-00033, issued December 5, 2003, an inspection of the scrubber controlling emissions from facility LA-77 shall be performed each calendar quarter. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.

These monitoring conditions are necessary because the baghouses, cyclones and scrubbers must operate properly to ensure compliance with 326 IAC 2-2 and 326 IAC 6-3-2.

5. The facilities located in the Refinery Area (LA-72, LA-73, LA-74, LA-75, LA-29, LA-41, LA-76, LA-65A, LA-31(stack 20A), LA-31(stack 20B), LA-32, LA-61, LA-28 and LA-51) have applicable compliance monitoring conditions as specified below:

(a) Visible emission notations of LA-29, LA-28 and LA-51 stack exhaust shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. Visible emission notations of LA-31(stack 20A), LA-31(stack 20B), and LA-32 stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. 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. 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. 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(b) The Permittee shall record the total static pressure drop across the baghouses used to control emissions from LA-31(stack 20A), LA-31(stack 20B), and LA-32, at least once per shift when the facilities are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(c) An inspection of all bags, controlling particulate emissions from facilities LA-31(stack 20A), LA-31(stack 20B), and LA-32, shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced. Inspections shall

also be performed whenever the respective baghouse is out of service for more than 24 consecutive hours. All defective bags shall be replaced.

(d) In the event that bag failure has been observed:

(1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it has been 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.

(2) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have 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).

(e) The Permittee shall monitor the pH of the scrubbing liquid, scrubber recirculation rate, and exhaust air stream pressure drop at least once per shift of the scrubber controlling emissions from LA-61 during normal operation. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when the pH, flow rate, and pressure drop readings are outside of the respective normal ranges, as specified by the manufacturer, for any one reading. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.

(f) The Permittee shall monitor the scrubber recirculation rate and exhaust air stream pressure drop at least once per shift of the scrubbers controlling emissions from LA-28 and LA-29 during normal operation. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when the flow rate and pressure drop readings are outside of the respective normal ranges, as specified by the manufacturer, for any one reading. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.

(g) The Permittee shall monitor the scrubbant flow rate at least once per hour of the scrubber controlling emissions from LA-51. The Permittee shall also average the previous twelve readings of the scrubbant flow rate once per shift. If the average scrubbant flow rate (based on twelve, one-hour readings) is less than 100 gallons per minute, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. An average scrubbant flow rate (based on twelve, one-hour readings) that is less than 100 gallons per minute is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit. The instruments used for determining the pH, flow rate, and pressure drop shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(h) An inspection of the scrubbers controlling emissions from facilities LA-28, LA-29, LA-51 and LA-61 shall be performed semi-annually. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.

(i) In the event that a scrubber malfunction has been observed:

(i) The affected unit will be shut down immediately in accordance with safe operating procedures until the failed unit has been repaired or the appropriate components replaced.

(ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

(j) In the event that cyclone failure has been observed failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. 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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the baghouse, cyclone and scrubber must operate properly to ensure compliance with 326 IAC 2-2, 326 IAC 6-3-2 and 326 IAC 7-1.1.

6. The facilities located in the Coal and Ash Storage and Handling (LA-33, LA-34, LA-35, LA-36, LA-37, LA-38, LA-55, LA-56, LA-42A (stack 30A), LA-42A(stack 30B), LA-42B (stack 31A) and LA-42B (stack 31B)) have applicable compliance monitoring conditions as specified below:

(a) Visible emission notations of the stack exhaust from LA-55, LA-56, LA-42A (stack 30A), LA-42A (stack 30B), LA-42B (stack 31A) and LA-42B (stack 31B) shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. Visible emission notations of the stack exhaust from LA-33, LA-34, LA-35, LA-36, LA-37, and LA-38 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. 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. 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. 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(b) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with LA-42A (stack 30A) and LA-42A (stack 30B) at least once per shift when the facilities are in operation. The Permittee shall record the total static pressure drop across the baghouses used in conjunction with LA-33, LA-34, LA-35, LA-36, LA-37, and LA-38 at least once per day when the facilities are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(c) An inspection of all bags, controlling particulate emissions from facilities LA-42A (stack 30A) and LA-42A (stack 30B), shall be performed at least once per calendar quarter. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced. An inspection of all bags, controlling particulate emissions from facilities LA-33, LA-34, LA-35, LA-36, LA-37, and LA-38, shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced. Inspections shall also be performed whenever the respective baghouse is out of service for more than 24 consecutive hours. All defective bags shall be replaced.

(d) In the event that bag failure has been observed:

(1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it has been 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.

(2) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have 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).

(e) An inspection shall be performed each calendar quarter of all rotoclones controlling LA-55 and LA-56. Inspections required by this condition shall not be performed in consecutive months.

(f) In the event that rotoclone failure has been observed, failed units and the associated process will be shut down immediately until the failed units have 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). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the baghouses and rotoclones must operate properly to ensure compliance with 326 IAC 2-2 and 326 IAC 6-3-2.

Conclusion

The operation of this grain processing (corn milling) plant shall be subject to the conditions of the attached Part 70 Permit No. T157-6008-00033.

NONRULE POLICY DOCUMENT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
NONRULE POLICY DOCUMENT

Title: Guidelines for Submittal and Review of Annual Compliance Certifications under the Federally Enforceable State Operating Permit (FESOP) and Part 70 Permit Programs
Identification Number: AIR 007 NPD
Date Originally Effective: March 6, 1997
Dates Revised: September 6, 2002
Other Policies Repealed or Amended: None
Brief Description of Subject Matter: Guidelines for IDEM and FESOP and Part 70 permittees for the annual compliance certification submittal and review requirements under 326 IAC 2-7-6(5)(C) and 326 IAC 2-8-5(a)(1)(C).
Citations Affected: 326 IAC 2-7-6(5)(C) and 326 IAC 2-8-5(a)(1)(C)

This nonrule policy document is intended solely as guidance and does not have the effect of law or represent formal Indiana Department of Environmental Management (IDEM) decisions or final actions. This nonrule policy document shall be used in conjunction with applicable laws. It does not replace applicable laws, and if it conflicts with these laws, the laws shall control. This nonrule policy document may be put into effect by IDEM thirty (30) days after presentation to the appropriate board and after it is made available for public inspection and comment, pursuant to IC 13-14-1-11.5. If the nonrule policy document is presented to more than one board, it will be effective thirty (30) days after presentation to the last. IDEM will submit the policy to the Indiana Register for publication. Revisions to the policy will follow the same procedure of presentation to the board and publication.

IDEM will begin using this nonrule policy document in reviewing annual compliance certifications submitted in 2003 and thereafter until such time as the nonrule policy document is revised.

General Requirements

1. The Annual Compliance Certification (ACC) must be submitted by the date identified in the permit as follows:
   - Part 70 (Title V) sources must submit the ACC to IDEM, U.S. EPA, Region 5, and the local air pollution control agency, where appropriate.
   - FESOP sources must submit the ACC to IDEM and the local air pollution control agency, where appropriate.

   The submittal dates are April 15 or July 1 and the ACC must be postmarked, have a shipping date on a sender's receipt from a common carrier or be hand delivered as of these dates. Refer to the permit to determine the specific submittal date and addresses.

2. The Annual Compliance Certification must cover the period from January 1 through December 31 of the year being reported, except for the first year of the permit. For the first year of the

permit, the certification is to cover the period from the date of permit issuance until December 31 of the year that the permit was issued. The time period the ACC covers should be noted on the certification.

3. The Annual Compliance Certification must include the Part 70 or FESOP certification form signed by a responsible official as defined in 326 IAC 2-7-1(34) for Part 70 sources or authorized individual as defined in 326 IAC 2-1.1-1 for FESOP sources. See pages 11 and 12 for definitions. The certification form that accompanies the ACC submitted to IDEM must contain an original signature and date.

4. The Annual Compliance Certification report is to include the following:
   - The identification of each term or condition of the permit for which compliance must be certified. This includes the permit terms or conditions under sections B, C and the various D sections.
   - The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period.
   - Whether compliance during the period was continuous or intermittent
   - Such other facts as the permitting authority may require to determine the compliance status of the source. This includes:
     - Identification of deviations, including deviations occurring during emergencies.
     - Verification of source summary information in Section A of the permit (optional).

Included with this nonrule policy document is a sample ACC form followed by guidelines for completion. Sources may create their own equivalent form for submittal as long as the required information outlined in this nonrule policy document and in applicable state and federal rules is included.

Permit amendments/modifications

Sources should be sure to use the most recent permit in effect during the reporting period as a starting point. All terms and conditions from permit amendments or modifications issued during the reporting period should be included as part of the annual compliance certification report. The source should also review requirements replaced by amendments or modifications to determine if some requirements that require certification were in effect for a portion of the reporting period. In some cases, this may be addressed by the submission of separate ACCs, although the source should be very clear in identifying the reporting period covered by the separate ACCs. If the only change has been a modification that adds a new Section D, it may be possible to submit a modified ACC that includes a separate certification for the new Section D with a different reporting period for the new requirements.

Permit renewals

Separate ACCs may also be needed to address permit renewals where the new permit is issued at some point during the year. This would be especially true if the permit terms and conditions changed significantly from one permit to the other. Once again, the source has the option of submitting separate ACCs or a modified ACC. As with permit modifications, a modified ACC would be most appropriate where the majority of the permit has remained the same, such as Sections A, B and C remaining the same, but a change or addition has occurred in Section D. In this situation, the source may be able to simply include a separate Section D certification for the changes or additions. Because the new permit will have a different permit number, the source should be sure to include the proper permit numbers and reporting periods in the ACC. In some cases, the source may wish to consult with IDEM about the proper way to address source specific situations.

If a source has to submit separate ACCs or a modified ACC for situations involving permit amendments, modifications or renewals, the source does not have to provide separate responsible official/authorized individual certifications. The ACCs can be included in one submittal with one responsible official/authorized individual certification.

Transfer of ownership and ACCs

In a situation where an owner transfers ownership or sells a source after December 31st, but prior to the ACC submittal deadline, IDEM would expect the seller to complete and submit the ACC prior to the sale. However, if the seller does not submit the ACC, the new owner would need to make the submission. IDEM suggests that the company buying the source make sure that the seller has done so or, at least, make sure the necessary information is available so the buyer can submit the ACC by the ACC submittal deadline.

If a sale takes place after the submittal deadline or later in the year, the new owner will be responsible for submitting the ACC the following year. It is recommended that the new owner makes sure the necessary information is available so that the ACC can be completed after the end of the year

A completed example is attached at the end of the nonrule policy document. The example is included to show how the required information can be provided on the ACC form to satisfy the annual compliance certification requirements. The example does not address situations where a source submits separate or modified ACCs. It is an ACC for a source that has not renewed a permit or had modifications during the reporting period. In completing the example, IDEM has chosen options that it believes appropriate. Others may have a different interpretation and would complete the certification differently. Each permit is different and each certification will be different because of the unique terms and conditions of the various permits.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O Box 6015
Indianapolis, IN 46206-6015

PART 70 / FESOP PERMIT- ANNUAL COMPLIANCE CERTIFICATION

This form should be used to satisfy the annual certification requirements for Part 70 sources under 326 IAC 2-7-6(5) and FESOP sources under 326 IAC 2-8-5(a)(1)(C). Attach a signed certification from the permit to complete the annual compliance certification.

SOURCE INFORMATION					
Source name:					
Source address:					
City:		State:		Zip code:	
Mailing address: (if different)					
City:		State:		Zip code:	
Permit number:					
Contact person:					
Phone number:					
Fax number:					
Reporting period:					

Section A - Information Verification (Optional)
Is the information in Section A correct?
If not, what information has changed:

Attach a signed certification form from the permit to complete this report.

COMPLIANCE CERTIFICATION

The source was in continuous compliance with all of the Section B permit terms and conditions that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in Section B of the permit:	
The source was in continuous compliance with all of the Section B permit terms and conditions that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in Section B of the permit, except for the terms and conditions listed below:	

	Permit term/condition	Comp. status CC / IC	Methods	Report date / Comments
SECTION B - GENERAL CONDITIONS (copy as needed)				

CC = continuous compliance ; IC = intermittent compliance

	Permit term/condition	Comp. status CC / IC	Methods	Report date / Comments
SECTION C - SOURCE OPERATION CONDITIONS (copy as needed)				

CC = continuous compliance ; IC = intermittent compliance

Permit term/condition		Comp. status CC / IC	Methods	Report date / Comments
SECTION D - FACILITY OPERATION CONDITIONS (copy as needed)				

CC = continuous compliance ; IC = intermittent compliance

Source information

When completing this section, provide the name, phone number, etc. for the source contact person. This person should be someone that is familiar with the plant and the Part 70 or FESOP permit. This may be an environmental manager or a consultant, but does not have to be the same person signing the certification.

Section A

There are no permit terms or conditions in Section A that require compliance. As part of the compliance certification, IDEM is asking that the source indicate whether or not the information in Section A is accurate. The verification of information is optional and IDEM will not reject an ACC if the information is not supplied. If the information is not accurate and there have been changes that have not been addressed with an administrative amendment or permit modification, IDEM requests that the source identify these changes. It should be noted that the verification does not relieve the source from complying with administrative amendment or permit modification requirements. If the owner or operator has submitted an administrative amendment or minor permit modification, but IDEM has not acted on the application, it is suggested that the date the application was submitted be included.

Examples of information that may have changed include a change in the name of the company, the addition of a new type of insignificant activity (a specifically regulated insignificant activity for Part 70 sources) not previously on-site, or the addition or removal of equipment.

Sections B, C and D

The sample form provides tables that can be used to identify the appropriate terms and conditions in Sections B, C and D. The Part 70 or FESOP permit table of contents can be used as a guide to include the condition number and description into the forms. It is not necessary to include the complete term or condition (see example).

There are some permit terms and conditions in Sections B and C that may be interdependent on terms and conditions in Sections C and D. For instance, a deviation from an emission limit or record keeping requirement in Section D would require that a deviation would also have to identified for permit condition B.8, Compliance with Permit Conditions. If a source would like to make it clear that a deviation is associated with more than one permit term or condition, the associated permit term or condition could be cross referenced in the "Report date / Comments" column, although this is not required.

In order to streamline the certification process for Section B, IDEM will allow a general statement of compliance for this section. At the top of the table for Section B, the source can indicate whether the source was in continuous compliance with all of the terms and conditions for Section B by checking one of the boxes. If the source was in continuous compliance (see discussion of continuous vs. intermittent below) with all of the terms and conditions in Section B with no deviations, check the first line and no additional information is needed. If the source was not in continuous compliance with all of the Section

B terms and conditions, then check the second line and identify any deviations in the table. This would include any deviations that result during an emergency. If the deviation or emergency has not been reported during the year in a deviation, emergency occurrence, quarterly or other compliance report, additional information should be attached to describe the deviation, how long the deviation lasted, estimates of excess emissions, whether or not the deviation was corrected, and the actions taken to correct the deviation. If the deviation or emergency was reported previously, all that needs to be included is the date of the report in the "Report date / Comments" column.

A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit, including exceedances during an emergency. Deviations would include not taking a required action, such as the failure to conduct specified compliance monitoring, to take a response step or to maintain proper records, or exceeding a permit limitation for a specified pollutant.

Because not all of the terms and conditions under Section B require compliance, an alternative would be to list out all of the terms and conditions. Then the source could indicate that the conditions that do not impose a work practice or emission standard or require testing, monitoring, record keeping or reporting are not applicable (N/A). Or the source could only list those conditions that impose a work practice or emission standard or require testing, monitoring, record keeping or reporting.

The tables for Sections C and D should be completed by filling in the table with the terms and conditions in these sections of the Part 70 or FESOP permit. Unlike Section B, the source should provide the requested information for each term and condition in Section C and various Section Ds. If a source has multiple Section Ds, the source should include all of the terms and conditions in each Section D in the table. For each of the terms and conditions, the source should provide the information called for in the table. As with Section B, if the source was not in continuous compliance with the listed terms and conditions, then any deviations (including exceedances during an emergency) should be identified in the table. If this information has been submitted to IDEM previously in a Quarterly Deviation and Compliance Monitoring Report, Emergency Occurrence Report or other required report, then the source should provide the date of that report in the column, "Report date / Comments". If the deviation has not been reported previously, additional information should be attached to describe the deviation, how long the deviation lasted, estimates of excess emissions, whether or not the deviation was corrected, and the actions taken to correct the deviation.

There may be some situations where a permit term or condition may not require a specific action (does not impose a work practice or emissions standard) or the action is dependent on something else (actions related to stack testing would only occur or be required if a stack test was actually performed). In these instances, a source may also use the designation of "N/A" for not applicable.

In some cases, a condition in Section D may include several monitoring requirements. In the attached example, condition D.1.10 and D.1.11 requires daily checks of dry filters or water baffles and a weekly overspray observation and associated record keeping. In this case, the certification lists each

of the requirements separately, conditions D.1.10(a) and D.1.10(b) and conditions D.1.11(a) and D.1.11(b). Review the permit terms and conditions carefully to determine if more than one requirement is included under a particular term or condition.

In other cases, some rules allow for several compliance options with a future compliance date and the source may choose the compliance option most appropriate for the source. In these cases, the source should identify the permit term(s) and condition(s) associated with the compliance option the source has chosen and provide the required information. The other permit terms and conditions would not be applicable and "N/A" would be used if these terms and conditions are listed.

In any case, the source should review the permit terms and conditions carefully when completing the annual compliance certification to make sure the certification is accurate and addresses each relevant permit term and condition.

Compliance status (CC/ IC):

The annual compliance certification must indicate whether compliance with the permit terms and conditions was continuous or intermittent. U.S. EPA has not defined what is considered continuous or intermittent compliance, although the issue has been the subject of much debate. If U.S. EPA issues guidance that differs from this nonrule policy document, IDEM will revise this document. In order to assist permit holders with the completion of the required certification, IDEM is providing the following guidance.

Continuous compliance (CC):

In order to certify continuous compliance, a source must have no deviations, irrespective of the monitoring frequency, for the relevant permit term or condition during the reporting period. If a source has identified a deviation during the reporting period, a source cannot certify continuous compliance for the relevant permit term or condition.

Intermittent compliance (IC):

If a deviation has occurred during the reporting period, the source must certify intermittent compliance for the particular permit term or condition. As noted previously, the source must provide information about the deviation, including what the deviation was, how long the deviation lasted, estimates of excess emissions, whether or not the deviation was corrected, and the actions taken to correct the deviation.

- If this information **has been submitted** to IDEM previously in a Quarterly Deviation and Compliance Monitoring Report, Emergency Occurrence Report or other required report, then the source should provide the date of that report in the column, "Report date / Comments".
- If this information **has not been submitted** previously, then the source should attach the information to the certification and the date included in the "Report date / Comments" column would be the date of the certification.

It should be noted that the identification of a deviation does not mean an enforcement action will be initiated. A determination of whether an enforcement action will be initiated can only be made after review and analysis of the data collected from the required monitoring, reports of deviations and any other credible evidence.

Methods:

One of the items that is required as part of an annual compliance certification is the identification of the "methods or means" used to determine the compliance status with each permit term or condition. The following is a list of standard monitoring methods and abbreviations that may be used to complete the annual compliance certification.

Continuous emission monitoring system = CEMS
Continuous opacity monitoring system = COMS
Stack test = ST
Visible emissions = VE
Record keeping = RK
Review of records = RR
Mass balance = MB
Emission factors = EF
Inspections = Insp
Fuel analysis = FA
Work practice = WP
Parametric monitoring = PM
Calculations = Calc
Other = O (specify in the Comments column)

Responsible official/Authorized individual definitions:

Part 70 requirements

"Responsible official" means the following:

A) For a corporation:

(i) a president;
(ii) a secretary;
(iii) a treasurer;
(iv) a vice president of the corporation in charge of a principal business function;
(v) any other person who performs similar policy or decision making functions for the corporation; or
(vi) a duly authorized representative of any person listed in this clause if the representative is responsible for the overall operation of one (1) or more manufacturing, production, or operating facilities applying for or subject to a Part 70 permit and either:

(AA) the facilities employ more than two hundred fifty (250) persons or have gross annual sales or expenditures exceeding twenty-five million dollars ($25,000,000) (in second quarter 1980 dollars); or
(BB) the delegation of authority to such representative is approved in advance by the commissioner.

(B) For a partnership or sole proprietorship, a general partner or the proprietor, respectively.

(C) For a municipality, state, federal, or other public agency, either a principal executive officer or ranking elected official. As used in this clause, "principal executive officer of a federal agency" includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency, for example, a regional administrator of the U.S. EPA.
(D) For affected sources:
(i) the designated representative for actions, standards, requirements, or prohibitions under Title IV of the CAA or the regulations promulgated thereunder; and
(ii) the designated representative for any other purposes under a Part 70 permit.

A duly authorized representative may be delegated authority to sign a compliance certification, but only if the following occur:

- The representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities and either:
  - the facilities employ more than 250 persons; or
  - have gross annual sales or expenditures exceeding $25,000,000 (in second quarter 1980 dollars)*****; or
  - the delegation is approved in advance by the commissioner.

An example of a responsible official or duly authorized representative would be a plant or site manager that is responsible for the overall operation of a manufacturing plant. Examples of individuals that do not meet the criteria include environmental consultants or environmental managers, human resource directors and safety coordinators that are not responsible for the overall operation of a plant.

***** IDEM can provide a conversion of the dollar figure into current dollars upon request.

FESOP requirements

"Authorized individual" means an individual responsible for the overall operation of one (1) or more manufacturing, production, or operating plants or a duly authorized representative of such person. For any public agency, the term means either a ranking elected official, the chief executive officer, or a designated representative of such person having responsibility for the overall operations of a principal geographic unit of the agency.

The definition of an "authorized individual" is similar to that of a "responsible official", except that the definition of authorized individual is not as narrow. IDEM expects that the authorized individual would have a similar level of control as a responsible official, but the definition could include health and safety managers and others.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O Box 6015
Indianapolis, IN 46206-6015

PART 70 / FESOP PERMIT- ANNUAL COMPLIANCE CERTIFICATION

This form should be used to satisfy the annual certification requirements for Part 70 sources under 326 IAC 2-7-6(5) and FESOP sources under 326 IAC 2-8-5(a)(1)(C). Attach a signed certification from the permit to complete the annual compliance certification.

SOURCE INFORMATION					
Source name:	Blue Ox Woodworks, Inc.				
Source address:	1234 N. Main St.				
City:	Greentown	State:	IN	Zip code:	47345
Mailing address: (if different)					
City:		State:		Zip code:	
Permit number:	T000-0000-0000				
Contact person:	John Smith				
Phone number:	317/989-1234				
Fax number:	317/989-5678				
Reporting period:	1/1/00 to 12/31/00				

Section A - Information Verification (Optional)
Is the information in Section A correct? No
If not, what information has changed: Degreasing operation that does not exceed 145 gallons per 12 months
and not subject to 326 IAC 20-6 has been added. Administrative amendment submitted 3/15/01. Removed paint
booth, PB-1. Administrative amendment submitted 4/10/01.

Attach a signed certification form from the permit to complete this report.

COMPLIANCE CERTIFICATION

The source was in continuous compliance with all of the permit terms and conditions in Section B that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in Section B of the permit:	
The source was in continuous compliance with all of the permit terms and conditions in Section B that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in Section B of the permit, except for the terms and conditions listed below:	X

Permit term/condition		Comp. Status CC / IC	Methods	Report date / Comments
SECTION B - GENERAL CONDITIONS				
B.8	Compliance with Permit Conditions	IC	RK, RR, VE, WP	4/28/00 (B.10), 3/2/00 (B.11), 8/15/00 (D.1.12), 8/17/00 (C.2 and D.2.3), 9/25/00 (C.7), 10/5/00 (C.21), 4/15/01 (D.1.1 and D.1.8)
B.10	Annual Compliance Certification	IC	RR	Submitted 1999 ACC 13 days late, 4/28/00
B.11	Preventative Maintenance Plan	IC	RR	3/2/00, Failed to prepare PMP on time

CC = continuous compliance ; IC = intermittent compliance ; RK = record keeping ; RR = records review

Permit term/condition		Comp. status CC / IC	Methods	Report date / Comments
SECTION C - SOURCE OPERATION CONDITIONS				
C.1	Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour	CC	RK	
C.2	Opacity	IC	VE	8/17/00, Emergency Occurrence Report
C.3	Open Burning	CC	WP	
C.4	Incineration	CC	RK	
C.5	Fugitive Dust Emissions	CC	WP	
C.7	Operation of Equipment	IC	RR	9/25/00
C.8	Stack Height	CC	RK	
C.9	Asbestos Abatement Projects	CC	RK	
C.10	Performance Testing	CC	RK	
C.11	Compliance Requirements	CC	RK	
C.12	Compliance Monitoring	CC	RK	
C.13	Maintenance of Emission Monitoring Equipment	CC	RK	
C.14	Monitoring Methods	CC	PM, RK, VE	
C.15	Pressure Gauge and Other Instrument Specifications	CC	RK	
C.16	Emergency Reduction Plans	CC	RK	
C.17	Risk Management Plan	CC	RK	
C.18	Compliance Monitoring Plan - Failure to Take Response Steps	CC	RK, RR	
C.19	Actions Related to Noncompliance Demonstrated by a Stack Test	CC	RK	
C.20	Emission Statement	CC	RK	
C.21	General Record Keeping Requirements	IC	RK	10/5/00
C.22	General Reporting Requirements	CC	RR	
C.23	Compliance with 40 CFR 82 and 326 IAC 22-1; Stratospheric Ozone Protection	CC	WP	

CC = continuous compliance ; IC = intermittent compliance; RK = record keeping ; RR = records review; PM = parametric monitoring ; VE = visible emissions ; WP = work practice

Permit term/condition		Comp. status CC / IC	Methods	Report date / Comments
SECTION D - FACILITY OPERATION CONDITIONS				
D.1.1	Volatile Organic Compounds (VOC)	IC	WP	4/15/01, Deviation report attached
D.1.2	PSD Minor Limit	CC	RK	
D.1.4	Particulate Matter (PM)	CC	RK	
D.1.5	Preventive Maintenance Plan	CC	RK	
D.1.6	Testing Requirements	CC	ST	
D.1.8	VOC Emissions	IC	RK	4/15/01, Deviation report attached
D.1.9	Particulate Matter (PM)	CC	WP	
D.1.10(a)	Monitoring	CC	Insp	
D.1.10(b)	Monitoring	CC	Insp	
D.1.11(a)	Record Keeping Requirements	CC	RK	
D.1.11(b)	Record Keeping Requirements	CC	RK	
D.1.12	Reporting Requirements	IC	RR	8/15/00
D.2.1	Particulate Matter (PM)	CC	RK	
D.2.2	Preventive Maintenance Plan	CC	RK	
D.2.3	Particulate Matter (PM)	IC	RK	8/17/00, Emergency Occurrence Report
D.2.4	Visible Emissions Notations	CC	VE, RK	
D.2.5	Parametric Monitoring	CC	RK	
D.2.6	Broken or Failed Bag Detection	CC	Insp	
D.2.7(a)	Record Keeping Requirements	CC	RK	
D.2.7(b)	Record Keeping Requirements	CC	RK	
D.2.8	Reporting Requirements	CC	RR	

CC = continuous compliance ; IC = intermittent compliance ; RK = record keeping ; RR = records review ; VE = visible emissions ; Insp = inspection ; ST = stack test ; WP = work practice

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
(and include local agency if applicable)

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Blue Ox Woodworks, Inc.
Source Address: 1234 N. Main St., Greentown, IN 47345
Mailing Address: Same
Part 70 Permit No.: T000-0000-0000

Months: _September_ to _December__ Year: ___2000_____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do 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".
9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
x**9** THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD
Permit Requirement (specify permit condition #) B.8, D.1.1 and D.1.8
Date of Deviation: 12/2/00 to 12/7/00 — **Duration of Deviation:** 5 days
Number of Deviations: 1
Probable Cause of Deviation: A non-compliant coating was used to paint metal parts because a vendor supplied a non-compliant coating.
Response Steps Taken: Upon discovery, the company immediately resumed using a compliant coating and the non-compliant coating was returned to the vendor. The company used 100 gallons of non-compliant coating with a VOC content of 4.0 lbs./gal. and an extra 50 pounds of VOC were emitted above allowable VOC emissions.
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: Joe Smith

Title/Position: Environmental Manager

Date: 4/15/01

Phone: 317/989-1234

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Blue Ox Woodworks, Inc.
Source Address: 1234 N. Main St., Greentown, IN 47345
Mailing Address: same
Part 70 Permit No.: T000-0000-0000

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:

x **9** Annual Compliance Certification Letter

9 Test Result (specify) _____

x **9** Report (specify) Deviation report

9 Notification (specify) _____

9 Affidavit (specify) _____

9 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: Sam R. Jones

Title/Position: Vice President

Phone: 317/888-9999

Date: 4/13/01