

**PART 70 OPERATING PERMIT  
OFFICE OF Air Quality**

**IBP, Inc.  
Hwy. 35 & 25 Bypass  
Logansport, Indiana 46947**

(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.

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.: T017-7369-00034	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date:  Expiration Date:

## TABLE OF CONTENTS

<b>A</b>	<b>SOURCE SUMMARY</b> .....	5
A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
<b>B</b>	<b>GENERAL CONDITIONS</b> .....	7
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)]	
B.3	Enforceability [326 IAC 2-7-7]	
B.4	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]	
B.8	Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]	
B.9	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.10	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.11	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)]	
B.12	Emergency Provisions [326 IAC 2-7-16]	
B.13	Permit Shield [326 IAC 2-7-15]	
B.14	Multiple Exceedances [326 IAC 2-7-5(1)(E)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination	
B.17	Permit Renewal [326 IAC 2-7-4]	
B.18	Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	
B.19	Permit Revision Under Economic Incentives and Other Programs	
B.20	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.21	Source Modification Requirement [326 IAC 2-7-10.5]	
B.22	Inspection and Entry [326 IAC 2-7-6]	
B.23	Transfer of Ownership or Operation [326 IAC 2-7-11]	
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]	
<b>C</b>	<b>SOURCE OPERATION CONDITIONS</b> .....	19
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
C.1	Particulate Matter Emission Limitations For Processes with Process Weight Rates	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Operation of Equipment [326 IAC 2-7-6(6)]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]	
	<b>Testing Requirements [326 IAC 2-7-6(1)]</b>	
C.9	Performance Testing [326 IAC 3-6]	
	<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.10	Compliance Requirements [326 IAC 2-1.1-11]	

**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)]
- C.12 Monitoring Methods [326 IAC 3]
- C.13 Pressure Gauge and Other Instrument Specifications

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

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

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

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1 FACILITY OPERATION CONDITIONS - Inedible Rendering Facility ..... 28**

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

- D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.2 VOC [326 IAC 8-1-6]
- D.1.3 326 IAC 2-7-6(6)
- D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirement**

- D.1.5 VOC
- D.1.6 Particulate Matter (PM)

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

- D.1.7 Visible Emissions Notations
- D.1.8 Parametric Monitoring

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

- D.1.9 Record Keeping Requirements

**D.2 FACILITY OPERATION CONDITIONS - 50 MMBtu Natural Gas Fired Boilers ..... 32**

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

- D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

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

- D.2.2 Reporting Requirements

**D.3 FACILITY OPERATION CONDITIONS - Insignificant Activities ..... 33**

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

- D.3.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

**Compliance Determination Requirement**

- D.3.2 Particulate Matter Limitation (PM)

<b>Certification</b> .....	34
<b>Emergency Occurrence Report</b> .....	35
<b>Natural Gas Fired Boiler Certification</b> .....	37
<b>Quarterly Deviation and Compliance Monitoring Report</b> .....	38

## 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 meat packing and rendering plant.

Responsible Official:	Darrell Schmidt
Source Address:	Hwy. 35 & 25 Bypass, Logansport, IN 46947
Mailing Address:	2125 South County Road 125 West, Logansport, IN 46947
SIC Code:	2011,2077
County Location:	Cass
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD

### 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:

- (a) One (1) Inedible Pork Rendering Facility, with a production capacity of 13,957 pounds per hour of crax (bone meal), consisting of the following equipment:
  - (1) One (1) Dupps 320U wet cooker, with emissions controlled by a condenser and a venturi/packed bed scrubber with a flow rate of 18,000 acfm, and one (1) Dupps 1800 wet cooker that will be used only as a backup.
  - (2) One (1) Dupps drainer screw, with emissions controlled by a venturi/packed bed scrubber with a flow rate of 18,000 acfm.
  - (3) Three (3) Dupps high pressure pressors, with emissions controlled by a venturi/packed bed scrubber with a flow rate of 18,000 acfm.
  - (4) Two (2) Sharples centrifuges, with emissions controlled by a venturi/packed bed scrubber with a flow rate of 18,000 acfm.
  - (5) Two (2) screw conveyors, with emissions controlled by a venturi/packed bed scrubber with a flow rate of 18,000 acfm.
  - (6) One (1) precrusher metering bin, with emissions controlled by a venturi/packed bed scrubber with a flow rate of 18,000 acfm.
  - (7) One (1) inedible crax bin, with uncontrolled emissions exhausting inside the building.
  - (8) One (1) screen, with uncontrolled emissions exhausting inside the building.

- (9) One (1) inedible crax silo, with uncontrolled emissions exhausting to the atmosphere.
- (10) One (1) truck loadout, with uncontrolled emissions.
- (11) One (1) rail loadout, with uncontrolled emissions.
- (12) One (1) hammermill with uncontrolled emissions exhausting inside the building.
- (b) Two (2) natural gas-fired boiler that use propane as a alternative fuel, identified as B001 and B002, installed 1968, each with a maximum heat input rate of fifty (50) million British thermal units per hour (MMBtu/ hr) and exhausting to stack B1.

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) Edible Rendering System [326 IAC 6-3-2]
- (b) Blood Drying System with a maximum finished product rate of 2,625 pounds per hour consisting of a Dupps Ring Dryer Furnace which is a natural gas fired combustion unit using propane as an alternative fuel with maximum heat input rate of three (3) million British thermal units per hour (MMBtu/hr), a product bin using a spray tower identified as C001 as control, and a product storage silo using a baghouse as control.[326 IAC 6-3-2]
- (c) Floatation System including a melt tank, a Sharples centrifuge, a Sweeco screener, and a sludge tank identified as IR002 with a maximum usage of 11,550 pounds of inedible material per hour and using a spray tower identified as C001 as control. [326 IAC 6-3-2]
- (d) Hair System including the Anco hair hydrolizer, the batch cooker, and the hair silo with a maximum usage of 3,855 pounds of raw hair material per hour and using a spray tower identified as C001 as control for odor. [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)]

---

This permit is issued for a fixed term of five (5) years from the original date, 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 Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

---

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information 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 submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) 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; or for information claimed to be confidential, the Permittee may furnish such records directly to the U.S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, then the Permittee must furnish record directly to the U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

---

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) 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.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

**B.9 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.10 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 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

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.11 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:

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

The PMP and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation 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 contributes to any violation. The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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 on the Commissioner within a reasonable time.

**B.12 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, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance 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)(10) 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) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the

emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

**B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

---

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.
- This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superceded by this permit.
- (c) 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.
- (d) 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.
- (e) 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.
- (f) 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).
- (g) 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)]
- (h) 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)(7)]

**B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

---

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.15 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 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. 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.

The notification by the Permittee 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 or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 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.17 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.18 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 should 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)]

B.19 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)(D)(i) 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.20 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), (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 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.21 Source Modification Requirement [326 IAC 2-7-10.5]**

---

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

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]**

---

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 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.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(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 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate 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.

**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, 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 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(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 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, 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) **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 that the inspector be accredited is 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 source 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. 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 units, compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.12 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, Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

**C.13 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 ( $\pm 2\%$ ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, 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 ( $\pm 2\%$ ) of full scale reading.
- (c) 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.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

---

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval 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 ninety (90) days after the date of issuance of this permit.

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

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) 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.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;

- (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
  - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
  - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (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. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that 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 an administrative amendment 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) Records shall be kept of all instances in which the compliance related information was not met and of all response steps 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.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and

record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.17 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 documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.18 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) The Permittee shall submit an annual 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. The annual emission statement shall meet the following requirements:
  - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) 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.

**C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

---

- (a) Records of all required data, reports, and support information 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 kept 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.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

---

- (a) The source 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, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not 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.21 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.

**SECTION D.1**

**FACILITY OPERATION CONDITIONS**

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

One (1) Inedible Pork Rendering Facility, with a production capacity of 13,957 pounds per hour of crax (bone meal), consisting of the following equipment:

- (a) One (1) Dupps 320U wet cooker, with emissions controlled by a condenser and a venturi/packed bed scrubber with a flow rate of 18,000 acfm, and one (1) Dupps 1800 wet cooker that will be used only as a backup.
- (b) One (1) Dupps drainer screw, with emissions controlled by a venturi/packed bed scrubber with a flow rate of 18,000 acfm.
- (c) Three (3) Dupps high pressure pressors, with emissions controlled by a venturi/packed bed scrubber with a flow rate of 18,000 acfm.
- (d) Two (2) Sharples centrifuges, with emissions controlled by a venturi/packed bed scrubber with a flow rate of 18,000 acfm.
- (e) Two (2) screw conveyors, with emissions controlled by a venturi/packed bed scrubber with a flow rate of 18,000 acfm.
- (f) One (1) precrusher metering bin, with emissions controlled by a venturi/packed bed scrubber with a flow rate of 18,000 acfm.
- (g) One (1) inedible crax bin, with uncontrolled emissions exhausting inside the building.
- (h) One (1) screen, with uncontrolled emissions exhausting inside the building.
- (i) One (1) inedible crax silo, with uncontrolled emissions exhausting to the atmosphere.
- (j) One (1) truck loadout, with uncontrolled emissions.
- (k) One (1) rail loadout, with uncontrolled emissions.
- (l) One (1) hammermill with uncontrolled emissions exhausting inside the building.

(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 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the venturi/packed bed scrubber shall not exceed 35.8 pounds per hour when operating at a process weight rate of 50,775 pounds per hour.

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

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

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

- (b) The requirement from CP 017-9481-00034, issued on June 15, 1998, Operation Condition 10, that establishes a 19.9 lb/hr allowable PM emission rate is not applicable, because IDEM, OAQ has determined that the limit should be recalculated using the equation above instead of the equation that was used:  $E = 55.0 P^{0.11} - 40$ . Thus, Operation Condition 10 of CP 017-9481-00034, is hereby rescinded.

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

---

Pursuant to 326 IAC 8-1-6, emissions from the Dupps 320U wet cooker shall be vented through the condenser and venturi/ packed bed scrubber as BACT.

**D.1.3 326 IAC 2-7-6(6)**

---

The inedible pork rendering facility shall be operated in the following manner to minimize odors:

- (a) Precautions in operation of the process equipment to minimize overheating and burning of inedible rendering material.
- (b) Cleaning of inedible rendering equipment and areas shall be done every operational day.
- (c) Air from the room housing the inedible rendering equipment shall be vented through six roof vents and scrubbed with water using fine mist atomizing spray nozzles. A minimum of one spray nozzle shall be operational at each vent. The atomizing spray nozzles shall be used as needed to minimize the release of air contaminants from the roof vents, and only when the ambient temperature is above a temperature which will prevent the water spray from freezing.

**D.1.4 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 the condenser and the venturi/packed bed scrubber.

**Compliance Determination Requirements [326 IAC 2-7-6(1)&(6)] [326 IAC 2-1.1-11]**

**D.1.5 VOC**

---

In order to comply with D.1.2, the condenser shall be in operation at all times that the Dupps 320U wet cooker is in operation.

**D.1.6 Particulate Matter (PM)**

---

Emissions from the major inedible rendering equipment shall be vented through the venturi/packed bed scrubber. In order to comply with D.1.1, the venturi/packed bed scrubber shall be in operation at all times that the inedible pork rendering facility is in operation.

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

#### D.1.7 Visible Emissions Notations

---

- (a) Daily visible emissions notations of the venturi/packed bed scrubber exhaust shall be performed during normal daylight operations. A trained employee will 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

#### D.1.8 Parametric Monitoring

---

The Permittee shall record the following operating parameters from the condenser and the venturi/packed bed scrubber at least once per shift when the scrubber is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the acceptable ranges for these values are as follows:

- (a) The pressure drop across the first stage of the scrubber shall be less than 6.0 inches of water.
- (b) The liquid recycle rate across the first stage of the scrubber shall be greater than 50 gallons per minute.
- (c) The pressure drop across the second stage of the scrubber shall be less than 4.0 inches of water.
- (d) The liquid recycle rate across the second stage of the scrubber shall be greater than 150 gallons per minute.
- (e) The pH of the scrubbant in the second stage of the scrubber shall be greater than 8.0.
- (f) The residual chlorine in the second stage of the scrubber shall be greater than 25 ppm.
- (g) The temperature between the condenser and the venturi scrubber shall not exceed 180F.
- (h) The temperature entering the packed bed scrubber shall not exceed 120F.

The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the readings are outside the above mentioned ranges for any one reading.

Failure to take response steps in accordance with section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

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

#### **D.1.9 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the venturi/packed bed scrubber exhaust.
  
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain records of the following operational parameters at least once per shift during normal operation when venting to the atmosphere:
  - (A) Inlet and outlet differential static pressure,
  - (B) liquid recycle rate,
  - (C) pH of the scrubbant water; and
  - (D) the oxidation reduction potential (ORP).
  - (E) temperature between the condenser and the venturi scrubber.
  
- (c) 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)]:** Two (2) natural gas fired boilers identified as B001 and B002, installed 1968, rated at fifty (50) MMBtu per hour each, exhausting at one (1) stack, identified as B1. These boilers use propane as a back up fuel which has a sulfur content of 15gr/100cf. (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 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

---

- (a) Pursuant to 326 IAC 6-2-3 (d) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input.
  
- (b) The requirement from CP 017-9481-00034, issued on June 15, 1998, Operation Condition 9, that establishes a 0.275 lbs/MMBtu PM limit is not applicable. IDEM, OAQ has determined that not all of the combustion units are indirect heating; therefore, the two 50MMBtu/hr boilers should only be considered when calculating the limit. Thus, Operation Condition 9 of CP 017-9481-00034, is hereby rescinded.

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

#### D.2.2 Reporting Requirements

---

The Permittee shall certify, on the form provided, that natural gas was fired in the boilers at all times during each quarter. Alternatively, the Permittee shall report the number of days during which an alternate fuel was burned during each quarter.

### SECTION D.3

### FACILITY OPERATION CONDITIONS

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

- (a) Edible rendering system
- (b) Blood Drying System with a maximum finished product rate of 2,625 pounds per hour consisting of a Dupps Ring Dryer Furnace which is a natural gas fired combustion unit using propane as an alternative fuel with maximum heat input rate of three (3) million British thermal units per hour (MMBtu/hr), a product bin using a spray tower identified as C001 as control, and a product storage silo using a baghouse as control.
- (c) Flotation System including a melt tank, an Alfa Laval centrifuge, a Sweeco screener, and a sludge tank identified as IR002 with a maximum usage of 11,550 pounds of inedible material per hour and using a spray tower identified as C001 as control.
- (d) Hair System including the Anco hair hydrolizer, the batch cooker, and the hair silo with a maximum usage of 3,855 pounds of raw hair material per hour and using a spray tower identified as C001 as control for odor.

(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 Particulate Matter (PM) [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the edible rendering system, the allowable PM emission rate from the handling of dried product in the blood system, the allowable PM emission rate from the flotation process, and the allowable PM emission rate from the hair system shall not exceed allowable PM emission rate based on the following equation:

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

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

- (b) The requirement from CP 017-9481-00034, issued on June 15, 1998, Operation Condition 10, that establishes the allowable PM emission rates for the edible rendering system, the blood system, and the flotation process is not applicable, because IDEM, OAQ has determined that the limit should be recalculated using the equation above instead of the equation that was used:  $E = 55.0 P^{0.11} - 40$ . Thus, Operation Condition 10 of CP 017-9481-00034, is hereby rescinded.

#### Compliance Determination Requirement

##### D.3.2 Particulate Matter (PM)

Pursuant to CP-017-9481-00034, issued on June 15, 1998, the baghouse for PM control shall be in operation and control emissions from the handling of dried product in the blood system at all times that the blood system is in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF Air Quality  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: IBP, Inc.  
Source Address: Hwy. 35 & 25 Bypass, Logansport, IN  
Mailing Address:  
Part 70 Permit No.: T017-7369-00034

**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:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 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:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF Air Quality**  
**COMPLIANCE BRANCH**  
**P.O. Box 6015**  
**100 North Senate Avenue**  
**Indianapolis, Indiana 46206-6015**  
**Phone: 317-233-5674**  
**Fax: 317-233-5967**

**PART 70 OPERATING PERMIT**  
**EMERGENCY OCCURRENCE REPORT**

Source Name: IBP, Inc.  
Source Address: Hwy. 35 & 25 Bypass, Logansport, IN  
Mailing Address:  
Part 70 Permit No.: T017-7369-00034

**This form consists of 2 pages**

**Page 1 of 2**

- |   |
|---|
| <p><b>9</b> 1. This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>C 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</li><li>C The Permittee must submit notice by mail or facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|---|

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 <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

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

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

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

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF Air Quality  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: IBP, Inc.  
Source Address: Hwy. 35 & 25 Bypass, Logansport, IN  
Mailing Address:  
Part 70 Permit No.: T017-7369-00034

<b>This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.</b>		
<u>Report period</u>		
Beginning: _____		
Ending: _____		
<u>Boiler Affected</u>	<u>Alternate Fuel</u>	<u>Days burning alternate fuel</u>
		<u>From</u> <u>To</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.	
Signature: _____	
Printed Name: _____	
Title/Position: _____	
Date: _____	

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF Air Quality  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: IBP, Inc  
Source Address: Hwy. 35 & 25 Bypass, Logansport, IN  
Mailing Address:  
Part 70 Permit No.: T017-7369-00034

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

Page 1 of 2

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.

9 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:**

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

Form Completed By: \_\_\_\_\_

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

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

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

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: IBP, Inc.  
Source Location: Hwy. 35 & 25 Bypass, Logansport, IN  
County: Cass  
SIC Code: 2011, 2077  
Operation Permit No.: T017-7369-00034  
Permit Reviewer: Polly Hite

On December 31, 2000, the Office of Air Quality (OAQ) had a notice published in the Pharos Tribune, Logansport, Indiana, stating that IBP, Inc. had applied for a Part 70 Operating Permit to operate a meat packing and rendering 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.

Effective January 1, 2001, the Office of Air Management's name was changed to the Office of Air Quality; therefore, all references to the Office of Air Management have been changed to the Office of Air Quality, and all references to OAM have been changed to OAQ.

On January 24, 2001, IBP, Inc. submitted comments on the draft Part 70 permit. Upon further review, the OAQ has decided to make revisions to the permit (highlighted language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes. The summary of the comments and responses is as follows:

Comment 1:

Condition A.3(c), the correct name of the centrifuge in the flotation system is Sharples instead of Alfa Laval.

Response 1:

The following correction has been made to A.3(c):

- (c) Flotation System including a melt tank, an ~~Alfa Laval~~ Sharples centrifuge, a Sweeco screener, and a sludge tank identified as IR002 with a maximum usage of 11,550 pounds of inedible material per hour and using a spray tower identified as C001 as control. [326 IAC 6-3-2]

Comment 2:

IBP wishes to clarify that condition D.1.3(b) is not intended to impose a clean-in-place (CIP) system on each piece of equipment in rendering but rather a general clean and wash down of the floors and equipment every day. IBP currently cleans down the rendering area several times a day

during operating hours as well has extensive clean down at the end of the operational day.

Response 2:

The intent of condition D.1.3 is to minimize odors from the rendering process. A cleaning process should be in place to minimize odor, but IDEM does not specify what that process should be.

Comment 3:

IBP wishes condition D.1.8(b) be modified so that the requirement for the recycle liquid flow across the first stage of the scrubber to be greater than 50gpm instead of within the range of 50 to 100 gpm. A flow over 100 gpm will not harm the operation of the system and therefore should not be a limitation of operation. The scrubber manufacturer, SCP Control, has certified that a flow over 50gpm without an upper limit is acceptable for the system.

Response 3:

The following change has been made to D.1.8(b):

- (b) The liquid recycle rate across the first stage of the scrubber shall be ~~within the range of~~ greater than 50 to 100 gallons per minute.

Comment 4:

IBP wishes condition D.1.8(d) be modified so that the requirement for the recycle liquid flow across the second stage of the scrubber to be greater than 150gpm instead of within the range of 150 to 200 gpm. A flow over 200 gpm will not harm the operation of the system and therefore should not be a limitation of operation. The scrubber manufacturer, SCP Control, has certified that a flow over 150gpm without an upper limit is acceptable for the system.

Response 4:

The following change has been made to D.1.8(d):

- (d) The liquid recycle rate across the second stage of the scrubber shall be ~~within the range of~~ greater than 150 to 200 gallons per minute.

Comment 5:

IBP understands that IDEM has intended for condition D.1.8(g) to be used as a means of monitoring the operation of the condenser on the outlet of the inedible cooker. The configuration of the outlet of the condenser to the inlet of the venturi scrubber allows for the non-condensibles from the cooker to commingle with other rendering sources prior to entering the venturi scrubber thus altering the inlet venturi temperature from what the temperature on the outlet of the condenser would be. IBP would like to clarify the outlet of the condenser temperature be set to not exceed 180F and the temperature entering the packed bed scrubber shall not exceed 120F as presented by the scrubber manufacturer.

Response 5:

The following change has been made to D.1.8(g) and D.1.8(h) has been added:

- (g) The temperature between the condenser and the venturi scrubber shall not exceed ~~above~~ 120F 180F.

- (h) The temperature entering the packed bed scrubber shall not exceed 120F.

Comment 6:

IBP would like clarification on the recordkeeping requirement in D1.8 and D1.9 in order to eliminate confusion; either the records should be required to be taken once per shift or daily.

Response 6.

The following change has been made to D.1.9(b):

- (b) To document compliance with condition D.1.8, the Permittee shall maintain the following:  
(1) ~~Daily~~ records of the following operational parameters **at least once per shift** during normal operation when venting to the atmosphere:

Comment 7:

IBP would like to clarify that the existing boilers have not been modified since June 8, 1989 and therefore are not subject to NSPS Subpart Dc. IBP did request to modify boiler #1 to combust landfill gas but to date the changes have not been made to the boiler. At this time, IBP does not have plans to modify that boiler #1 or combust landfill gas as previously requested. Until the boiler is modified there are no NSPS requirements that IBP is subject to. IBP would like to also clarify that if Boiler #1 is modified that would be the only boiler subject to NSPS, not Boiler #2.

Response 7:

In 1996, IBP replaced No. 6 fuel oil with propane as a backup fuel for Boilers #1 and #2. During the permit review process this replacement, the emissions from burning propane were compared to the emissions from burning natural gas to determine whether the boilers were subject to the 40CFR Part 60, Subpart Dc. There was a slight increase in NO<sub>x</sub> emissions when burning propane. Instead of comparing the emissions from the propane to the natural gas, the emissions from the propane should be compared to the emissions from the No. 6 fuel oil to determine whether the change meets the definition of modification in 40 CFR60.2 since the propane was replacing the No. 6 fuel oil not the natural gas. The change resulted in a decrease of emissions. In 1998, IBP proposed the use of landfill gas as an additional backup fuel for Boiler # 1, and at that time it was determined that as a result of this change the boiler was subject to 40 CFR 60 Subpart Dc. The following changes will be made:

1. Since the source is not planing on using landfill gas as a backup fuel, A.2(b) and D.2 facility description have been revised so that landfill gas is no longer described as a backup fuel for Boiler #1.
2. The following condition from a previous approval will not be incorporated into this Part 70 permit, CP 017-9422-00034 issued on July 9, 1998, Condition 5:  
NSPS (40 CFR 60.48c)
  - (a) The permittee shall submit notification of the date of construction, anticipated startup, and actual startup. The notification shall include:
    - (i) The design heat input of the affected facility and identifacaiton of fuels to be combusted in the affected facility.
    - (ii) The annual capacity factor at which the permittee anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
  - (b) The permittee shall record and maintain records of the amounts of each fuel combusted during each month. All records shall be maintained by the permittee for a period of two years following the date of such record.

3. D.2.2.General Provisions Relating to NSPS and D.2.3 Record Keeping Requirements will be removed from the permit.

Comment 8:

IBP would like to clarify that the records required for condition D.2.3 are the amounts of fuel used in the plant not specific to each boiler each month. Currently, IBP tracks the natural gas and propane usage for the whole facility on a daily, weekly, and monthly basis. IBP does not have meters in place that can track the usage of fuel specifically for the boilers and to our (IBP's) knowledge is not required to have specific fuel tracking meters on these boilers. At this time, the usage on the boilers is calculated based on the total plant usage and the Btu input of the boilers in comparison to the Btu of the remainder of the plant. IBP requests that we be allowed to calculate the usage in the boilers in the same manner for the Title V as is current practice. IBP opposes having to install separate gas meters for each of the boilers as a result of the Title V permit.

Response 8:

D.2.3 Record Keeping Requirements will be removed from the permit. See Response 7 for explanation.

Comment 9:

IBP requests that no specific fuel reporting be required for the two boilers (condition D.2.4). IBP did request that Boiler #1 be modified to combust landfill gas but to date these modifications have not been initiated. Even if the boiler was modified to combust landfill gas which may warrant the boiler being subject to Subpart Dc, the boiler should not have fuel reporting requirements more stringent than NSPS requirements. The combustion of landfill gas would be under the same requirements as natural gas or propane: to record and maintain records of the amount of fuel combusted each day, and the records would have to be maintained for a period of two years only on the boiler subject to NSPS Subpart Dc. There would be no specific fuel reporting requirements other than the fuel reported on the annual emissions inventory.

Response 9:

The natural gas certification is used in lieu of the requirement of performing daily visible emission notations to indicate that the source is in compliance with 326 IAC 5-1. If this reporting requirement is removed from the permit, a condition will be added to require the performance of daily visible emission notations. At this time, no change will be made.

# Indiana Department of Environmental Management Office of Air Management

## Technical Support Document (TSD) for a Part 70 Operating Permit

### Source Background and Description

**Source Name:** IBP, Inc.  
**Source Location:** Hwy. 35 & 25 Bypass, Logansport, IN  
**County:** Cass  
**SIC Code:** 2011, 2077  
**Operation Permit No.:** T017-7369-00034  
**Permit Reviewer:** Polly Hite

The Office of Air Management (OAM) has reviewed a Part 70 permit application from IBP, Inc. relating to the operation of a meat packing and rendering plant.

### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) Inedible Pork Rendering Facility, with a production capacity of 13,957 pounds per hour of crax (bone meal), consisting of the following equipment:
  - (1) One (1) Dupps 320U wet cooker, with emissions controlled by a condenser and a venturi/packed bed scrubber with a flow rate of 18,000 acfm, and one (1) Dupps 1800 wet cooker that will be used only as a backup.
  - (2) One (1) Dupps drainer screw, with emissions controlled by a venturi/packed bed scrubber with a flow rate of 18,000 acfm.
  - (3) Three (3) Dupps high pressure pressors, with emissions controlled by a venturi/packed bed scrubber with a flow rate of 18,000 acfm.
  - (4) Two (2) Sharples centrifuges, with emissions controlled by a venturi/packed bed scrubber with a flow rate of 18,000 acfm.
  - (5) Two (2) screw conveyors, with emissions controlled by a venturi/packed bed scrubber with a flow rate of 18,000 acfm.
  - (6) One (1) precrusher metering bin, with emissions controlled by a venturi/packed bed scrubber with a flow rate of 18,000 acfm.
  - (7) One (1) inedible crax bin, with uncontrolled emissions exhausting inside the building.
  - (8) One (1) screen, with uncontrolled emissions exhausting inside the building.

- (9) One (1) inedible crax silo, with uncontrolled emissions exhausting to the atmosphere.
- (10) One (1) truck loadout, with uncontrolled emissions.
- (11) One (1) rail loadout, with uncontrolled emissions.
- (12) One (1) hammermill with uncontrolled emissions exhausting inside the building.
- (b) Two (2) natural gas-fired boilers that use propane as a alternative fuel, identified as B001 and B002, installed 1968, each with a maximum heat input rate of fifty (50) million British thermal units per hour (MMBtu/ hr) and exhausting to stack B1. B001 also uses landfill gas as a backup fuel.

### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Edible Rendering System
- (b) Blood Drying System with a maximum finished product rate of 2,625 pounds per hour consisting of a Dupps Ring Dryer Furnace which is a natural gas fired combustion unit using propane as an alternative fuel with maximum heat input rate of three (3) million British thermal units per hour (MMBtu/hr), a product bin using a spray tower identified as C001 as control for particulate matter, and a product storage silo using a baghouse as control for particulate matter. Uncontrolled emissions PM10 from handling dried product is less than 5 pounds per day.
- (c) Flootation System including a melt tank, an Alfa Laval centrifuge, a Sweeco screener, and a sludge tank identified as IR002 with a maximum usage of 11,550 pounds of inedible material per hour and using a spray tower identified as C001 as control for particulate matter and odor. Uncontrolled emissions PM10 is less than 5 pounds per day.
- (d) Hair System including the Anco hair hydrolizer, the batch cooker, and the hair silo with a maximum usage of 3,855 pounds of raw hair material per hour and using a spray tower identified as C001 as control for odor.
- (e) Natural gas-fired combustion sources using propane as an alternative fuel with heat input equal to or less than ten (10) million Btu per hour:
  - (1) MAU-IR-1, 3.73 MMBtu/hr, Inedible rendering
  - (2) MAU-IR-2, 2.99 MMBtu/hr, Inedible rendering
  - (3) MAU-ER-1, 2.40 MMBtu/hr, Inedible rendering
  - (4) MAU-K-5, 3.84 MMBtu/hr, Skinning
  - (5) MAU-K-7, 0.46 MMBtu/hr, Crowd Pen
  - (6) MAU-CH-1, 3.00 MMBtu/hr, Chitts/ Casings
  - (7) MAU-H-1, 3.84 MMBtu/hr, Hides
  - (8) MAU-M-1, 3.48 MMBtu/hr, Maintenance
  - (9) MAU-E-1, 2.40 MMBtu/hr, Engine Room
  - (10) HVA-12, 0.40 MMBtu/hr, Men's Locker Room

- (11) HVA-13, 0.95 MMBtu/hr, Men's Locker Room
  - (12) HVA-15, 0.50 MMBtu/hr, Women's Locker Room
  - (13) HVA-16, 0.70 MMBtu/hr, Kitchen
  - (14) HVA-7, 0.50 MMBtu/hr, Cafeteria
  - (15) HVA-8, 0.20 MMBtu/hr, Classroom/ Meeting
  - (16) HVA-9, 0.07 MMBtu/hr, Support/ QC
  - (17) HVA-11, 0.23 MMBtu/hr, Welfare Office Lab
  - (18) HVA-23, 0.19 MMBtu/hr, New Women's Locker Room
  - (19) HVA-24, 0.40 MMBtu/hr, New Men's Locker Room
  - (20) HVA-25, 0.50 MMBtu/hr, Cafeteria
  - (21) HVA-3, 0.16 MMBtu/hr, USDA
- (f) Natural gas-fired combustion sources using propane as an alternative fuel whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(d)(1):
- (1) MAU-C-1, 9.00 MMBtu/hr, Cut floor
  - (2) MAU-C-2, 9.00 MMBtu/hr, Cut floor
  - (3) MAU-K-1, 7.68 MMBtu/hr, Kill floor
  - (4) MAU-K-2, 7.68 MMBtu/hr, Kill floor
  - (5) MAU-K-3, 7.68 MMBtu/hr, Kill floor
  - (6) MAU-K-4, 7.92 MMBtu/hr, Kill floor
  - (7) MAU-K-6, 8.16 MMBtu/hr, Stun and Bleed
- (g) Two (2) singers, natural gas fired combustion units using propane as an alternative fuel with maximum heat input rate of seven (7) million British thermal units per hour(MMBtu/hr), and whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(d)(1).
- (h) One (1) vaporizer, natural gas fired combustion unit using propane as an alternative fuel with maximum heat input rate of three (3) million British thermal units per hour (MMBtu/hr).
- (i) One (1) flare, natural gas fired combustion unit using propane as an alternative fuel with maximum heat input rate of three (3) million British thermal units per hour (MMBtu/hr).
- (j) A spinal vacuum pump.
- (k) A vacuum pump for steam sanitizing.
- (l) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day.
- (m) 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.
- (n) One (1) five hundred (500) gallon storage tank storing hydraulic oil.
- (o) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

- (p) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (q) Operations using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (r) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (s) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (t) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (u) Heat exchanger cleaning and repair.
- (v) Paved and unpaved roads and parking lots with public access.
- (w) Purging of gas lines and vessels that is 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.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Exemption 017-9422-00034, issued July 9, 1998
- (b) CP 017-9481-00034, issued on June 15, 1998 supersedes CP 017-4534-00034, issued on April 29, 1996
- (c) Significant Source Modification 017-12001-00034, issued on June 29, 2000

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (a) CP-017-9481-00034, issued on June 15, 1998

Operation Condition 9:

Particulate Matter Limitation

- 9. That pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) total particulate matter emissions from all the combustion units shall not exceed 0.275 pounds per million British thermal units of heat input.

Reason not incorporated:

Not all of the combustion units at the source are indirect heating; therefore, just the

50MMBtu boilers should be considered when calculating the limit. The limit was recalculated for the two boilers.

(b) CP-017-9481-00034, issued on June 15, 1998

Operation Condition 10:

Particulate Matter Limitation

10. That particulate matter emissions shall be considered in compliance with 326 IAC 6-3 provided that the maximum particulate emissions from:
- a) the edible rendering process shall not exceed 19.9 pounds per hour.
  - b) the blood system shall not exceed 10.6 pounds per hour
  - c) the main inedible process shall not exceed 17.6 pounds per hour
  - d) the floatation system shall not exceed 8.7 pounds per hour

Reason not incorporated:

These limits were recalculated using the following equation:  $E = 4.10 P^{0.67}$

**Air Pollution Control Justification as an Integral Part of the Process**

The company has submitted the following justification such that the condensers be considered as an integral part of the inedible rendering process:

- (a) The condenser collapses the exhaust vapors from the cookers (inedible and hair) and dryer (blood) to keep from back pressuring the equipment and causing unnecessary shutdowns. It would be impossible to operate the cookers or dryer without the operation of the condensers with the current design configuration of the rendering system.
- (b) The primary function of the condensers is heat recovery and to collapse the condensable vapors to prevent unnecessary shutdowns resulting from back pressure on the cooker or overloading the spray tower. Moreover, the condensers produce hot water for the facility. The boilers do not have sufficient capacity to produce enough hot water for sanitation for the entire facility. Without hot water for the plant, USDA would shutdown the plant for inadequate cleanup.
- (c) In the event of a plant shutdown, the facility would be unable to slaughter, render, or otherwise produce items for sale that would result in economic loss and employee hardship.

IDEM, OAM has evaluated the justifications and determined that the condensers will not be considered as an integral part of the inedible rendering process, because the source has not adequately demonstrated that the process cannot operate without the condensers or the condensers have an overwhelming positive net economic effect. Therefore, the permitting level will be determined using the potential to emit before the condensers.

**Enforcement Issue**

There are no enforcement actions pending.

## 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 December 5, 1996. Additional information was received on April 27, 1999.

A notice of completeness letter was mailed to the source on January 23, 1997.

## Emission Calculations

See Appendix A pages 1 through 6 of this document for detailed emissions calculations for the two (2) boilers that identified as B001 and B002.

The calculations submitted by the applicant for the inedible rendering system have been verified and found to be accurate and correct. These calculations are provided in Appendix A pages 7 through 13 of this document.

## 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	< 100
PM-10	< 100
SO <sub>2</sub>	< 100
VOC	> 100
CO	< 100
NO <sub>x</sub>	> 100
HAPs	< 10

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of NO<sub>x</sub> and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1999 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	30
PM-10	30
SO <sub>2</sub>	0
VOC	8
CO	23
NO <sub>x</sub>	27
HAPs	0

**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.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Inedible Rendering	26.2	26.2	0.37	13.45*	0.18	0.18	0.0
Boiler B001	3.0	3.0	3.67	4.76	35.04	45.5	0.0
Boiler B002	1.7	1.7	3.6	1.2	18.4	45.5	0.0
<b>Total Emissions</b>	<b>30.9</b>	<b>30.9</b>	<b>7.64</b>	<b>19.46</b>	<b>53.62</b>	<b>91.18</b>	<b>0.0</b>

\*PTE based on stack test results from IBP, Inc plants in Dakota City, NE July 1998 and Lexington, NE April 1999. Results are after the condenser based on the requirement to operate the condenser in the permit.

**County Attainment Status**

The source is located in Cass County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Cass County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Cass County has been classified as attainment or unclassifiable for all other regulated air pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset 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) The 50 MMBtu/hr boilers identified as B001 and B002 are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Dc). Although the boilers were constructed before June 9, 1989, the subsequent addition of alternate fuels after June 9, 1989 are considered modifications as defined in 40 CFR 60.2, and the boilers have a maximum design heat input capacity greater than 10 MMBtu/hr and less than or equal to 100 MMBtu/hr ; therefore, the boilers are subject to the New Source Performance Standard (NSPS) (326 IAC 12 and 40 CFR Part 60, Subpart Dc).
- (b) The degreasing operation is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR Part 63, Subpart T since the degreasing operation does not contain halogenated solvents.

#### **State Rule Applicability - Entire Source**

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

The source has submitted a Preventive Maintenance Plans (PMPs) on January 21, 1999 for the baghouse. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

##### **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 NOx and VOC. 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.

#### State Rule Applicability - Individual Facilities

##### 326 IAC 6-3-2 (Process Operations)

Pursuant to 017-12001-00034, issued on June 29,2000, the particulate matter (PM) from the inedible pork rendering facility shall be limited by the following:

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

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour} \\ P = 50, 775 \text{ lb/hr raw material} = 25.4 \text{ tons/hr} \end{array}$$

$$E = 4.10 (25.4)^{0.67} = 35.8 \text{ pounds per hour}$$

Controlled PM emissions from this facility are 5.98 pounds per hour; therefore, this facility can comply with this rule. The venturi/ packed bed scrubber shall be in operation at all times the rendering facility is in operation, in order to comply with this limit.

and

The particulate matter (PM) from the blood system shall be limited by the following:

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

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour} \\ P = 12,994 \text{ lb/hr raw material} = 6.60 \text{ tons/hr} \end{array}$$

$$E = 4.10 (6.50)^{0.67} = 14.4 \text{ pounds per hour}$$

and

The particulate matter (PM) from the edible rendering shall be limited by the following:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and}$$
$$P = \text{process weight rate in tons per hour}$$
$$P = 27,000 \text{ lb/hr} = 13.5 \text{ tons/hr}$$

$$E = 4.10 (13.5)^{0.67} = 23.4 \text{ pounds per hour}$$

and

Pursuant to 017-12001-00034, issued on June 29, 2000, the particulate matter (PM) from the floatation system shall be limited by the following:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and}$$
$$P = \text{process weight rate in tons per hour}$$
$$P = 11,550 \text{ lb/hr raw material} = 5.78 \text{ tons/hr}$$

$$E = 4.10 (5.78)^{0.67} = 13.3 \text{ pounds per hour}$$

and

The particulate matter (PM) from the hair system shall be limited by the following:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and}$$
$$P = \text{process weight rate in tons per hour}$$
$$P = 3,855 \text{ lb/hr raw material} = 1.9 \text{ tons/hr}$$

$$E = 4.10 (1.93)^{0.67} = 6.40 \text{ pounds per hour}$$

### 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating)

The PM emissions from the 100 MMBtu per hour heat input from the boilers identified as B001 and B002 shall be limited to 0.80 pounds per million British thermal unit. This limit was used because the calculated limitation was greater than 0.80 as established by the following equation:

$$Pt = \frac{C X a X h}{76.5 X Q^{0.75} X N^{0.25}}$$

where Pt = pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input;  
C = maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) for a period not to exceed a sixty (60) minute time period;  
Q = total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input;  
N = number of stacks in fuel burning operation;  
a = plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 mmBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 mmBtu/hr heat input; and  
h = stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as

follows.

$$\begin{aligned} C &= 50 \mu\text{g}/\text{m}^3 \\ a &= 0.67 \\ h &= 60\text{ft} \end{aligned}$$

$$\begin{aligned} Q &= 50\text{MMBtu}/\text{hr} + 50\text{MMBtu}/\text{hr} = 100\text{MMBtu}/\text{hr} \\ N &= 1 \end{aligned}$$

Pt = 0.83 > 0.8 Therefore, the boilers are limited to 0.8 lb/mmBtu.

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

The VOC emissions from the Dupps 320U wet cooker has potential emissions above 25 tons per year; therefore, 326 IAC 8-1-6 is applicable. The VOC emissions shall be reduced using best available control technology (BACT). The heat exchanger (condenser) and the venturi/packed bed scrubber working together will be considered BACT. The condenser and the venturi/ packed bed scrubber shall be in operation at all times the cooker is in operation, and the temperature between the condenser and the venturi scrubber shall not exceed above 120F.

#### 326 IAC 8-3 (Organic Solvent Degreasing Operations)

The degreasing operation is a water based operation and does not meet the applicability criteria for 326 IAC 8-3; therefore, it is not subject to 326 IAC 8-3.

### Testing Requirements

A stack test will not be required at this time, but if at any time in the future a stack test is determined to be necessary the commissioner may require a stack test to assure compliance with all applicable requirements.

### 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, OAM, 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 condenser and the venturi/ packed bed scrubber controlling VOCs and particulate matter have applicable compliance monitoring conditions as specified below:
  - (a) Daily visible emissions notations of the venturi/ packed bed scrubber exhaust shall be performed during normal daylight operations. A trained employee will 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.

- (b) The Permittee shall record the following operating parameters from the condenser and the venturi/packed bed scrubber at least once per shift when the condenser and the scrubber are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the acceptable ranges for these values are as follows:
- (1) The pressure drop across the first stage of the scrubber shall be less than 6.0 inches of water.
  - (2) The liquid recycle rate in the first stage of the scrubber shall be within the range of 50 to 100 gallons per minute.
  - (3) The pressure drop across the second stage of the scrubber shall be less than 4.0 inches of water.
  - (4) The liquid recycle rate in the second stage of the scrubber shall be within the range of 150 to 200 gallons per minute.
  - (5) The pH of the scrubbant in the second stage of the scrubber shall be greater than 8.0.
  - (6) The oxidation reduction potential (ORP) in the second stage of the scrubber shall be greater than 25 ppm.
  - (7) The temperature between the condenser and the venturi scrubber shall not exceed above 120F.

The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the readings are outside the above mentioned ranges for any one reading.

These monitoring conditions are necessary because the condenser and the venturi/packed bed scrubber must operate properly to ensure compliance with 326 IAC 2-7, 326 IAC 2-1-3(i)(8) and 326 IAC 8-1-6..

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the 1990 Clean Air Act. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

None of the listed air toxics will be emitted from this source.

### **Conclusion**

The operation of this meat packing and pork rendering facility shall be subject to the conditions of

IBP, Inc.  
Logansport, Indiana  
Permit Reviewer: Polly Hite

Page 13 of 13  
T017-7369-00034

the attached proposed **Part 70 Permit No. T017-7369-00034.**

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Small Industrial Boiler**

**Company Name: IBP, inc.**

**Address City IN Zip: 2125 South County Road 125 West, Logansport, IN 46947**

**CP: T017-7369**

**Pit ID: 017-00034**

**Reviewer: Polly Hite**

**Date: 4/1/99**

**Boiler B001**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

50.0

438.0

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 *see below	5.5	84.0
Potential Emission in tons/yr	1.7	1.7	0.1	21.9	1.2	18.4

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

PM emission factors are condensable and filterable.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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



**Appendix A: Emission Calculations**  
**LPG - Propane - Industrial Boilers**  
**(Heat input capacity: > 10 MMBtu/hr and < 100 MMBtu/hr)**

**Company Name: IBP, inc.**  
**Address City IN Zip: 2125 South County Road 125 West, Logansport, IN 46947**  
**CP: T017-7369**  
**Pit ID: 017-00034**  
**Reviewer: Polly Hite**  
**Date: 4/1/99**

Boiler B001

Heat Input Capacity                      Potential Throughput                      SO2 Emission factor = 0.10 x S  
 MMBtu/hr                                      kgals/year                                      S = Sulfur content = 15.00 grains/100ft<sup>3</sup>

50.00    4786.89

Emission Factor in lb/kgal	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	0.6	0.6	1.5 (0.10S)	19.0	0.5 *TOC value	3.2
Potential Emission in tons/yr	1.4	1.4	3.6	45.5	1.2	7.7

\*The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu  
 1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)  
 (Source - AP-42 (Supplement B 10/96) page 1.5-1)  
 Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-02-010-02)

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

**Appendix A: Emissions Calculations**

**Company Name:** IBP, inc.  
**Address City IN Zip:** 2125 South County Road 125 West, Logansport, IN 46947  
**CP:** T017-7369  
**Plt ID:** 017-00034  
**Reviewer:** Polly Hite  
**Date:** 10/11/00

**Boiler B001**

**Emissions from the use of landfill gas as a fuel; information from Exemption 017-9422-00034.**

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	5.5	5.5	6.7	66.0	8.7	72.0
Potential Emission in tons/yr	3.0	3.0	3.7	36.1	4.8	35.0

**Summary of the Emissions for each of the fuels**

Fuel	Potential to Emit (tons/year)					
	PM	PM10	SO2	NOx	VOC	CO
Natural Gas	1.7	1.7	0.1	21.9	1.2	18.4
Propane	1.4	1.4	3.6	45.5	1.2	7.7
Landfill Gas	3.0	3.0	3.7	36.1	4.8	35.0

**Worst Case Scenario from combustion of natural gas, propane, and landfill gas**

	PM	PM10	SO2	NOx	VOC	CO
Potential Emission in tons/yr	3.0	3.0	3.7	45.5	4.8	35.0

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Small Industrial Boiler**

**Company Name: IBP, inc.**

**Address City IN Zip: 2125 South County Road 125 West, Logansport, IN 46947**

**CP: T017-7369**

**Pit ID: 017-00034**

**Reviewer: Polly Hite**

**Date: 4/1/99**

**Boiler B002**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

50.0

438.0

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 *see below	5.5	84.0
Potential Emission in tons/yr	1.7	1.7	0.1	21.9	1.2	18.4

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

PM emission factors are condensable and filterable.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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



**Appendix A: Emission Calculations**

**LPG - Propane - Industrial Boilers**

**(Heat input capacity: > 10 MMBtu/hr and < 100 MMBtu/hr)**

**Company Name: IBP, inc.**

**Address City IN Zip: 2125 South County Road 125 West, Logansport, IN 46947**

**CP: T017-7369**

**Pit ID: 017-00034**

**Reviewer: Polly Hite**

**Date: 4/1/99**

Boiler B002

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
kgals/year

SO2 Emission factor = 0.10 x S

S = Sulfur content = 15.00 grains/100ft<sup>3</sup>

50.00

4786.89

Emission Factor in lb/kgal	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	0.6	0.6	1.5 (0.10S)	19.0	0.5 *TOC value	3.2
Potential Emission in tons/yr	1.4	1.4	3.6	45.5	1.2	7.7

\*The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

**Methodology**

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-02-010-02)

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

**Appendix A: Emissions Calculations**

**Company Name:** IBP, inc.  
**Address City IN Zip:** 2125 South County Road 125 West, Logansport, IN 46947  
**CP:** T017-7369  
**Plt ID:** 017-00034  
**Reviewer:** Polly Hite  
**Date:** 10/11/00

**Boiler B002**

**Summary of the Emissions for each of the fuels**

Fuel	Potential to Emit (tons/year)					
	PM	PM10	SO2	NOx	VOC	CO
Natural Gas	1.7	1.7	0.1	21.9	1.2	18.4
Propane	1.4	1.4	3.6	45.5	1.2	7.7

**Worst Case Scenario from combustion of natural gas and propane**

	PM	PM10	SO2	NOx	VOC	CO
Potential Emission in tons/yr	1.7	1.7	3.6	45.5	1.2	18.4