

PART 70 OPERATING PERMIT
Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services

National Starch and Chemical Company
1515 South Drover Street
Indianapolis, IN 46221

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

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

This permit also addresses certain New Source Review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

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.: T097-7714-00042	
Original Signed by: Janet G. McCabe, Assistant Commissioner Indiana Department of Environmental Management Office of Air Quality And John B. Chavez, Administrator Indianapolis Office of Environmental Services	Issuance Date: 4/14/04 Expiration Date: 4/13/09

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and the City of Indianapolis, Office of Environmental Services (OES). 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 wet corn milling plant which produces feed, gluten meal, germ meal, and heavy steepwater.

Responsible Official:	Vice President of Manufacturing, North America
Source Address:	1515 South Drover Street, Indianapolis, IN 46221
Mailing Address:	1515 South Drover Street, Indianapolis, IN 46221
General Phone Number:	(317) 656-2325
SIC Code:	2046
County Location:	Marion
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules Not 1 of 28 Source Categories Major Source, Section 112 of the Clean Air Act

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) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations [326 IAC 2-7-1(21)(G)(xxiii)]:
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: operations M1 through M4 and RSP shop. [326 IAC 2-7-1(21)(G)(vi)(CC)] [326 IAC 8-3-3]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 2-7-1(21)(G)(xiii)] [326 IAC 6-4]
- (d) Emission units or activities with potential uncontrolled PM10 emissions of less than 5 pounds per hour or 25 pounds per day [326 IAC 2-7-1(21)(B)]:
- (e) One (1) natural gas-fired #6 Starch Flash Dryer, identified as unit 575-3, constructed in 1993, a maximum heat input capacity of 40 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 575-3.
- (f) One (1) natural gas-fired #1 Spray Dryer, identified as unit 5549-1, constructed in 1993 and modified in 1998, a maximum heat input capacity of 25 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 5549-1.

- (g) One (1) natural gas-fired #2 Spray Dryer, identified as unit 5549-2, constructed in 1993 and modified in 1998, with a maximum heat input capacity of 25 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 5549-2.
- (h) One (1) natural gas-fired #5 Starch Flash Dryer, identified as unit 575-2, constructed in 1979 and replaced in 1995, with a maximum heat input capacity of 38 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 575-2.
- (i) One (1) natural gas-fired Feed Dryer, identified as unit 5502-1A, constructed in 1997, a maximum heat input capacity of 77 MMBtu/hr, with emissions controlled by a wet scrubber, and exhausting to the inlet of unit 5502-1D.
- (j) One (1) natural gas-fired Germ Dryer, identified as unit 5502-1B, constructed in 1997, a maximum heat input capacity of 24 MMBtu/hr, with emissions controlled by a wet scrubber, and exhausting to the inlet of unit 5502-1D.
- (k) One (1) natural gas-fired Gluten Dryer, identified as unit 5502-1C, constructed in 1997, a maximum heat input capacity of 32 MMBtu/hr, with emissions controlled by a wet scrubber, and exhausting to the inlet of unit 5502-1D.
- (l) One (1) natural gas-fired Regenerative Thermal Oxidizer, identified as unit 5502-1D, constructed in 1997, a maximum heat input capacity of 18 MMBtu/hr, used for particulate and opacity control, and exhausting to stack 5502-7.
- (m) Spray Agglomerator #3, identified as unit 5549-28, part of the spray agglomeration process, a maximum heat input capacity of 16.5 MMBtu/hr, with emissions controlled by a wet scrubber, and exhausting to stack 5549-28.
- (n) One (1) DSW Bulk Bag Filler, identified as unit 71-9, with emissions controlled by an integral baghouse, and exhausting to stack 71-9.
- (o) One (1) Chilsonator, identified as unit 5552-1, with emissions controlled by an integral baghouse, and exhausting to stack 5552-1.
- (p) One (1) Chilsonator Hopper, identified as unit 5552-2, with emissions controlled by an integral baghouse, and exhausting to stack 5552-2.
- (q) One (1) Truck Loadout Collector, identified as unit 5503-6, constructed in 1999, with emissions controlled by a baghouse, and exhausting to stack 5503-6.
- (r) One (1) Germ Bin, one (1) Pellet Bin #1, one (1) Pellet Bin #2, and one (1) Loadout Dust Collection System, identified as units 5503-2, 5503-3, 5503-4, and 5503-5, respectively, each constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5503-2.
- (s) One (1) DSW Packing Fugitive Dust Collector, identified as unit 71-7, constructed in 1977, with emissions controlled by a baghouse, and exhausting to stack 71-7.
- (t) One (1) RSP North Packing Line, identified as unit 577-2, constructed in 1979 and modified in 2000, with emissions controlled by a baghouse, and exhausting to stack 577-2.
- (u) One (1) Gluten Receiver, identified as unit 5503-1, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5503-1.
- (v) One (1) Pellet Cooler and one (1) Germ Cooler, identified as units 5502-5 and 5502-6, respectively, each constructed in 1997, with emissions controlled by a high efficiency cyclone, and exhausting to stacks 5502-5 and 5502-6 respectively.

- (w) Two (2) Loose Feed Bins, collectively identified as unit 5502-4, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5502-4.
- (x) One (1) Hammer Mill, identified as unit 5502-3, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5502-3.
- (y) One (1) DSE Bag Slitter, identified as unit 42-10, constructed in 1987, with emissions controlled by a baghouse, and exhausting to stack 42-10.
- (z) One (1) P-6 Rework Station, identified as unit 54-1, constructed in 1987, with emissions controlled by a baghouse, and exhausting to stack 54-1.
- (aa) One (1) RSP Hopper #4, identified as unit 577-5, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-5.
- (bb) One (1) RSP Hopper #6, identified as unit 577-6, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-6.
- (cc) One (1) RSP Hopper #5, identified as unit 577-7, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-7.
- (dd) One (1) RSP Hopper #1, identified as unit 577-8 constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-8.
- (ee) One (1) RSP Hopper #2, identified as unit 577-9, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-9.
- (ff) One (1) RSP Hopper #3, identified as unit 577-10, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-10.
- (gg) One (1) Industrial Packer, identified as unit 71-1, constructed in 1994, with emissions controlled by a baghouse, and exhausting to stack 71-1.
- (hh) Two (2) Spray Dryer Product Receivers, identified as units 5549-3 and 5549-4, constructed in 1993, each with emissions controlled by an integral baghouse, and exhausting to stacks 5549-3 and 5549-4.
- (ii) One (1) #1 Spray Dryer Storage Hopper #1, identified as unit 5549-7, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-7.
- (jj) One (1) #1 Spray Dryer Storage Hopper #2, identified as unit 5549-8, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-8.
- (kk) One (1) #2 Spray Dryer Storage Hopper #3, identified as unit 5549-9, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-9.
- (ll) One (1) #2 Spray Dryer Storage Hopper #4, identified as unit 5549-10, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-10.
- (mm) One (1) Agglomerator Feed Storage Bin, identified as unit 5549-12, constructed in 1995, with emissions controlled by an integral baghouse, and exhausting to stack 5549-12.
- (nn) One (1) Agglomerator, identified as unit 5549-13, constructed in 1995, with emissions controlled by a baghouse, and exhausting to stack 5549-13.

- (oo) One (1) Agglomerator Equipment Aspiration, identified as unit 5549-14, constructed in 1995, with emissions controlled by a baghouse, and exhausting to stack 5549-14.
- (pp) One (1) spray agglomeration process, constructed in 2000, consisting of the following units:
 - (1) East Box Packer Filter Receiver, identified as unit 5549-16, with emissions controlled by an integral baghouse, and exhausting to stack 5549-16.
 - (2) West Box Packer Filter Receiver, identified as unit 5549-17, with emissions controlled by an integral baghouse, and exhausting to stack 5549-17.
 - (3) Line 1 Middle Packer, identified as unit 5549-18, with emissions controlled by an integral baghouse, and exhausting to stack 5549-18.
 - (4) Line 1 North Packer, identified as unit 5549-19, with emissions controlled by an integral baghouse, and exhausting to stack 5549-19.
 - (5) #2 Fugitive Dust Collector, identified as emission unit 5549-20, with emissions controlled by a baghouse, and exhausting to stack 5549-20.
 - (6) Line 1 Packing ambient D/C, identified as unit 5549-21, with emissions controlled by baghouse, and exhausting to stack 5549-21.
 - (7) Line 2 Packer, identified as unit 5549-26, with emissions controlled by an integral baghouse, and exhausting to stack 5549-26.
- (qq) One (1) West Corn Truck Dump, identified as unit 56-1, constructed before 1968 and modified in 1996, with emissions controlled by a baghouse, and exhausting to stack 56-1.

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) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations: [326 IAC 2-7-1(21)(G)(xxiii)]
 - (1) One (1) DSE Hopper #9, identified as unit 42-3A; [326 IAC 6-1-12]
 - (2) One (1) DSE Hopper #10, identified as unit 42-3B; [326 IAC 6-1-12]
 - (3) One (1) DSE Hopper #11, identified as unit 42-3C; [326 IAC 6-1-12]
 - (4) One (1) DSE Hopper #12, identified as unit 42-3D; [326 IAC 6-1-12]
 - (5) One (1) DSE Hopper #13, identified as unit 42-3E; [326 IAC 6-1-12]
 - (6) One (1) DSE Hopper #14, identified as unit 42-3F; [326 IAC 6-1-12]
 - (7) One (1) DSE Hopper #2, identified as unit 42-7A; [326 IAC 6-1-12]
 - (8) One (1) DSE Hopper #4, identified as unit 42-7B; [326 IAC 6-1-12]
 - (9) One (1) DSE Hopper #6, identified as unit 42-7C; [326 IAC 6-1-12]

- (10) One (1) DSE Hopper #1, identified as unit 42-8A; [326 IAC 6-1-2]
 - (11) One (1) DSE Hopper #3, identified as unit 42-8B; [326 IAC 6-1-2]
 - (12) One (1) DSE Hopper #5, identified as unit 42-8C; [326 IAC 6-1-2]
 - (13) One (1) DSE Hopper #7, identified as unit 42-8D; [326 IAC 6-1-2]
 - (14) One (1) CWS #8 Mill Receiver; identified as unit 63-1A; [326 IAC 6-1-2]
 - (15) One (1) CWS Mill; identified as unit 63-17; [326 IAC 6-1-2]
 - (16) One (1) Starch Filter/Receiver 2 Bld 852, identified as unit 152-7; [326 IAC 6-1-2]
 - (17) One (1) Starch Mixer 4 Bld 852A Filter Receiver, identified as unit 152-8; [326 IAC 6-1-2]
 - (18) One (1) Starch Mixer 4 Bld 852A, identified as unit 152-9; [326 IAC 6-1-2]
 - (19) One (1) Starch Mixer 3 Bld 852A Filter Receiver, identified as unit 152-10; [326 IAC 6-1-2]
 - (20) One (1) Starch Mixer 3 Bld 852A, identified as unit 152-11; [326 IAC 6-1-2]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: operations M1 through M4 and RSP shop. [326 IAC 2-7-1(21)(G)(vi)(CC)][326 IAC 8-3-3]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 2-7-1(21)(G)(xiii)][326 IAC 6-4]
- (d) Emission units or activities with potential uncontrolled PM10 emissions of less than 5 pounds per hour or 25 pounds per day: [326 IAC 2-7-1(21)(B)]
- (1) One (1) 152-1 Filter Receiver; [326 IAC 6-1-2]
 - (2) One (1) 152-2 Mixer baghouse; [326 IAC 6-1-2]
 - (3) One (1) 152-3 Starch Cooler Filter Receiver Bld 852; [326 IAC 6-1-2]
 - (4) One (1) 152-4 Starch Mixer 2 Filter/Receiver Bld 852A; [326 IAC 6-1-2]
 - (5) One (1) 152-5 Starch Mixer 2 Bld 852A; [326 IAC 6-1-2]
 - (6) One (1) 152-6 Starch Storage Hopper; [326 IAC 6-1-2]
 - (7) One (1) 128-3 Starch Hopper D/C; [326 IAC 6-1-2]
 - (8) One (1) DSW Chemical Blender Bag Slitter, identified as unit 61-15; [326 IAC 6-1-2]
 - (9) One (1) DSE Hopper #8, identified as unit 42-4; [326 IAC 6-1-12]
 - (10) One (1) Dextrin #1 System Cooler Conveyor, identified as unit 61-3; [326 IAC 6-1-2]
 - (11) One (1) Dextrin Flash Dryer, identified as unit 61-9; [326 IAC 6-1-12]

- (12) One (1) Dextrin #3 System Cooler, identified as unit 61-22; [326 IAC 6-1-2]
- (13) One (1) Dextrin #2 System Cooler Conveyor, identified as unit 61-23; [326 IAC 6-1-2]
- (14) One (1) CWS South Conveying, identified as unit 63-4; [326 IAC 6-1-2]
- (15) One (1) CWS North Conveying, identified as unit 63-5; [326 IAC 6-1-2]
- (16) One (1) DSE North Packer, identified as unit 42-1; [326 IAC 6-1-12]
- (17) One (1) DSE South Packer, identified as unit 42-9; [326 IAC 6-1-2]
- (18) One (1) sodium sulfate conveying system, identified as unit 40-1; [326 IAC 6-1-2]
- (19) One (1) DSE Negative Receiver, identified as unit 42-6; [326 IAC 6-1-12]
- (20) One (1) DSE Railcar Loading - East Track, identified as unit 42-11; [326 IAC 6-1-2]
- (21) One (1) DSE Railcar Loading - West Track, identified as unit 42-12; [326 IAC 6-1-2]
- (22) One (1) Dextrin #1 System Mixer, identified as unit 61-1; [326 IAC 6-1-2]
- (23) One (1) Dextrin #1 System Cookers, identified as unit 61-2; [326 IAC 6-1-2]
- (24) One (1) Dextrin #2 System Mixer, identified as unit 61-6; [326 IAC 6-1-12]
- (25) Two (2) Dextrin #2 System East and West Tanks, identified as unit 61-7; [326 IAC 6-1-2]
- (26) One (1) Starch Storage Silo #3 Receiver, identified as unit 61-11; [326 IAC 6-1-2]
- (27) One (1) Starch Storage Silo #1 Receiver, identified as unit 61-12; [326 IAC 6-1-2]
- (28) One (1) Starch Storage Silo #1, identified as unit 61-13; [326 IAC 6-1-2]
- (29) One (1) Dextrin #1 System Packer, identified as unit 61-14; [326 IAC 6-1-12]
- (30) One (1) DSW Chemical Blender Tank; identified as unit 61-14A; [326 IAC 6-1-12]
- (31) One (1) Dextrin System Acidifiers; identified as unit 61-16; [326 IAC 6-1-2]
- (32) One (1) Dextrin #2 System Cooler; identified as unit 61-18; [326 IAC 6-1-2]
- (33) One (1) Dextrin #3 System Cookers; identified as unit 61-19; [326 IAC 6-1-2]
- (34) One (1) Starch Storage Silo #2; identified as unit 61-20; [326 IAC 6-1-2]
- (35) One (1) Starch Storage Silo #2 Receiver; identified as unit 61-21; [326 IAC 6-1-2]
- (36) One (1) Dextrin #3 System Mixer; identified as unit 61-24; [326 IAC 6-1-2]
- (37) One (1) Dextrin #3 System West Tank; identified as unit 61-25; [326 IAC 6-1-2]
- (38) One (1) Dextrin #3 System East Tank; identified as unit 61-26; [326 IAC 6-1-2]

- (39) One (1) Grain Elevator, identified as unit 56-2; [326 IAC 6-1-12]
- (40) One (1) CWS #7 Dryer Receiver; identified as unit 63-3; [326 IAC 6-1-2]
- (41) One (1) CWS Packer; identified as unit 63-9; [326 IAC 6-1-2]
- (42) One (1) Liquid Glue Bag Dump; identified as unit 63-12; [326 IAC 6-1-2]
- (43) One (1) CWS #9 and #10 Dryers Receiver; identified as unit 63-15; [326 IAC 6-1-2]
- (44) One (1) CWS #11, #12, and #13 Dryers; identified as unit 63-16; [326 IAC 6-1-2]
- (45) One (1) Starch Hopper D/C, identified as unit 128-3; [326 IAC 6-1-2]
- (46) One (1) CWS South Raw Material Dump; identified as unit 63-18; [326 IAC 6-1-2]
- (47) One (1) DSW Negative Receiver; identified as unit 63-20; [326 IAC 6-1-2]
- (48) Two (2) DSW Hoppers #17 and #18; identified as unit 71-2; [326 IAC 6-1-12]
- (49) One (1) Dextrin Packer; identified as unit 71-3; [326 IAC 6-1-2]
- (50) One (1) DSW Hopper #13, identified as unit 71-4A; [326 IAC 6-1-12]
- (51) One (1) DSW Hopper #1; identified as unit 71-5A; [326 IAC 6-1-12]
- (52) One (1) DSW Hopper #2; identified as unit 71-5B; [326 IAC 6-1-12]
- (53) One (1) DSW Hopper #3; identified as unit 71-5C; [326 IAC 6-1-12]
- (54) One (1) DSW Hopper #4; identified as unit 71-5D; [326 IAC 6-1-12]
- (55) One (1) DSW Hopper #5; identified as unit 71-5E; [326 IAC 6-1-12]
- (56) One (1) DSW Hopper #6; identified as unit 71-5F; [326 IAC 6-1-12]
- (57) One (1) DSW Hopper #7; identified as unit 71-5G; [326 IAC 6-1-12]
- (58) One (1) DSW Hopper #8; identified as unit 71-5H; [326 IAC 6-1-12]
- (59) One (1) DSW Hopper #9; identified as unit 71-5I; [326 IAC 6-1-12]
- (60) One (1) DSW Hopper #10; identified as unit 71-5J; [326 IAC 6-1-12]
- (61) One (1) DSW Hopper #11; identified as unit 71-5K; [326 IAC 6-1-12]
- (62) One (1) DSW Hopper #12; identified as unit 71-5L; [326 IAC 6-1-12]
- (63) One (1) DSW Bulk Car Loading; identified as unit 71-8; [326 IAC 6-1-2]
- (64) One (1) RSP Bulk Bag Packing; identified as unit 577-1; [326 IAC 6-1-2]
- (65) One (1) RSP Bulk Loading System A; identified as unit 577-4; [326 IAC 6-1-2]
- (66) One (1) RSP Bulk Loading Fugitive Dust Collector; identified as unit 577-4A; [326 IAC 6-1-2]

- (67) One (1) CWS Packing Hopper; identified as unit 578-2; [326 IAC 6-1-2]
- (68) One (1) CWS Bagging Line, identified as unit 578-1; [326 IAC 6-1-2]
- (69) One (1) CWS Milling System, identified as unit 578-3; [326 IAC 6-1-2]
- (70) One (1) CATO Cooling and Conveying, identified as unit 581-2; [326 IAC 6-1-2]
- (71) One (1) RSP South Packing Line, identified as unit 577-3; [326 IAC 6-1-2]

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

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

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

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

- (a) 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 and OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) The Indianapolis Air Pollution Control Board (IAPCB) has adopted by reference state rules listed in Attachment A of this permit. The version adopted by reference includes all amendments, additions and repeals filed with the Secretary of State through August 10, 1997 and published in the Indiana Register September 1, 1997, unless otherwise indicated in the adoption by reference. For the purposes of this permit, all state rules adopted by reference by the IAPCB are enforceable by OES using local enforcement procedures. Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

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

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, and the OES within a reasonable time, any information that IDEM, OAQ, and the City of Indianapolis, OES 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, and the OES copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This

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

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15th of each year to:

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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, and the OES 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, and the OES may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) within sixty (60) days after issuance of this permit, including the following information on each facility:

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

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

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and the OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and the OES. IDEM, OAQ, and the OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

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

IDEM, OAQ:

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

OES:

Telephone No.: 317-327-2237 (ask for Data Compliance)

Facsimile No.: 317-327-2274

- (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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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, and the OES may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, and the OES by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.
- This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, and the OES shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, and the OES has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, and the OES has issued the modification. [326 IAC 2-7-12(b)(8)]

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

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

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

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

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement

that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, and the OES 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, and the OES 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, or the OES at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or the OES may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and the OES 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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (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, and OES on or before the date it is due.
- (2) If IDEM, OAQ, and the City of Indianapolis, OES, 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, and the OES, 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, and the OES, 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, and the OES fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2

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

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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, and OES in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

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

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, OES, or U.S. EPA is required.

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

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

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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, OES, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and the OES 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, or the OES the applicable fee is due April 1st of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing 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 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 thirty percent (30%) 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.2 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.3 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.4 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.5 Operation of Equipment [326 IAC 2-7-6(6)]

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

C.6 Stack Height [326 IAC 1-7]

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

C.7 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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.8 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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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 and the OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and the City of Indianapolis, OES, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 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 sixty (60) 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 sixty (60) 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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

in writing, prior to the end of the initial sixty (60) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

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

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.12 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 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 Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.13 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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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, and the OES, 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, and the OES, 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.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ and the OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR 60/63 requirement.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is

operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
 - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
 - (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.17 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 emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4 . The 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 regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

The 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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-1.1-1(1).

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

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this Permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner and the OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and the OES 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.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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

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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221
- (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, and the OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

C.20 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)]:

- (e) One (1) natural gas-fired #6 Starch Flash Dryer, identified as unit 575-3, constructed in 1993, with a maximum heat input capacity of 40 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 575-3.
- (f) One (1) natural gas-fired #1 Spray Dryer, identified as unit 5549-1, constructed in 1993 modified in 1998, with a maximum heat input capacity of 25 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 5549-1.
- (g) One (1) natural gas-fired #2 Spray Dryer, identified as unit 5549-2, constructed in 1993 modified in 1998, with a maximum heat input capacity of 25 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 5549-2.
- (h) One (1) natural gas-fired #5 Starch Flash Dryer, identified as unit 575-2, constructed in 1979 and replaced in 1995, with a maximum heat input capacity of 38 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 575-2.
- (i) One (1) natural gas-fired Feed Dryer, identified as unit 5502-1A, constructed in 1997, a maximum heat input capacity of 77 MMBtu/hr, with emissions controlled by a wet scrubber, and exhausting to the inlet of unit 5502-1D.
- (j) One (1) natural gas-fired Germ Dryer, identified as unit 5502-1B, constructed in 1997, a maximum heat input capacity of 24 MMBtu/hr, with emissions controlled by a wet scrubber, and exhausting to the inlet of unit 5502-1D.
- (k) One (1) natural gas-fired Gluten Dryer, identified as unit 5502-1C, constructed in 1997, a maximum heat input capacity of 32 MMBtu/hr, with emissions controlled by a wet scrubber, and exhausting to the inlet of unit 5502-1D.

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (l) One (1) natural gas-fired Regenerative Thermal Oxidizer, identified as unit 5502-1D, constructed in 1997, a maximum heat input capacity of 18 MMBtu/hr, used for particulate and opacity control, and exhausting to stack 5502-7.
- (m) Spray Agglomerator #3, identified as unit 5549-28, part of the agglomerator process listed in Section D.2, a maximum capacity of 16.5 MMBtu/hr with emissions controlled by a wet scrubber, and exhausting to stack 5549-28.

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

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

D.1.1 Prevention of Significant Deterioration [326 IAC 2-2]

- (a) Pursuant to CP 097-00042-97-01, issued March 24, 1997, A 097-00042-98-01, issued April 15, 1998, and in order to render the requirements of 326 IAC 2-2 not applicable:
 - (1) The combined input of corn grind to units 5502-1A, 5502-1B, 5502-1D, 5502-3 (Section D.2), 5502-4 (Section D.2), 5502-5 (Section D.2), 5502-6 (Section D.2), 5502-7 (Section D.2), 5503-1 (Section D.2), 5503-2 (Section D.2), 5503-3 (Section D.2), 5503-4 (Section D.2), 5503-5 (Section D.2) and 5503-6 (Section D.2) shall not exceed 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month. The total emission rate shall not exceed 0.0030 lb PM/PM10 per bushel. Compliance with this limit is equivalent to total PM/PM10 emissions of less than or equal to 44.396 tons of per year.
 - (2) The combined input of starch for units 5549-1 and 5549-2 shall not exceed 22,500 tons per twelve consecutive month period with compliance determined at the end of each month and the total emission rate shall not exceed 2.50 lb PM/PM10 per ton of starch. Compliance with this limit is equivalent to total emissions of less than 28.11 tons of PM/PM10 per year.
 - (3) The SO₂ emissions from units 5502-1A, 5502-1B, 5502-1C, and 5502-1D, shall not exceed a total of 8.05 pounds per hour. Compliance with this limit is equivalent to total SO₂ emissions of less than or equal to 35.26 tons of per year.
 - (4) The combined input of natural gas to 5502-1A, 5502-1B, 5502-1C, and 5502-1D shall not exceed 1,851 million cubic feet (MMcf) per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit is equivalent to total NO_x emissions of less than or equal to 39 tons per year.
- (b) Pursuant to CP 097-00042-97-01, issued March 24, 1997, SSM 097-11362-00042, issued August 31, 1996, and in order to render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable, the following facilities are limited as indicated in the table below:

Unit/ Stack ID	PM/PM10 Limit (gr/dscf)	PM/PM10 Limit (lb/hr)	PM/PM10 Limit (ton/yr)
575-3	0.012	5.63	24.65
5549-1	0.02	--	--
5549-2	0.02	--	--
5549-28	0.025	9.64	42.24

- (c) Pursuant to M 097-00042-99-01, issued February 25, 1999, the total PM/PM10 emissions from stack 5502-7 (exhausting emissions from units 5502-1A through 5502-1D) shall not exceed 0.0114 gr/dscf, 4.53 lb/hr, and 19.856 tons per year. Compliance with this limit will render the requirements of 326 IAC 2-2 not applicable.
- (d) Pursuant to CP 097-00042-99-01, issued June 11, 1999, the starch produced from unit 40-3 shall not exceed 145,610 tons per twelve consecutive month period with compliance determined at the end of each month and the emission rate shall not exceed 0.581 lb PM/PM10 per ton of starch produced. Compliance with this limit is equivalent to PM/PM10 emissions of less than or equal to 42.3 tons per year, will satisfy the requirements of 326 IAC 6-1-12, and render the requirements of 326 IAC 2-2 not applicable.

D.1.2 Particulate Matter [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the particulate matter emissions from 575-3, 5549-1, 5549-2, 5502-1A, 5502-1B, 5502-1C, 5502-1D, and 5549-28 shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

Compliance with the respective particulate matter emission limits in Condition D.1.1 for 575-3, 5549-1, 5549-2, 5502-1A, 5502-1B, 5502-1C, 5502-1D, and 5549-28, will ensure compliance with the requirements of 326 IAC 6-1-2.

D.1.3 Particulate Matter [326 IAC 6-1-12]

- (a) Facilities 40-4, 40-3, 40-2, 575-1, and 575-2 are limited as indicated in the table below:

Facility	PM Limit (gr/dscf)	PM Limit (ton/yr)
40-4	0.02	44.1
40-3	0.016	42.3
40-2	0.016	31.9
575-1	0.011	32.4
575-2	0.011	32.4

Compliance with these limits will satisfy the requirements of 326 IAC 6-1-12.

- (b) Pursuant to CP 097-00042-95-02, issued March 8, 1995, the amount of dry product processed by unit 575-2 shall not exceed 123,300 tons per twelve month consecutive period with compliance determined at the end of each month. This limit is equivalent to PM emissions of less than or equal to 32.4 tons per year. Compliance with this limit will satisfy the requirements of 326 IAC 6-1-12.

D.1.4 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to CP 097-00042-95-03, issued October 6, 1995, the amount of methanol emitting corn starch produced from unit 575-2 shall not exceed 11,995,200 pounds per twelve consecutive

month period with compliance determined at the end of each month and the emission rate shall not exceed 0.0041 lb VOC per lb of starch. Compliance with this limit is equivalent to VOC emission of less than 25 tons per year and will render the requirements of 326 IAC 8-1-6 not applicable.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.6 Particulate and Sulfur Dioxide Control

In order to comply with Conditions D.1.1, D.1.2, and D.1.3, the scrubber shall be in operation and control particulate and SO₂ emissions from units 5502-1A, 5502-1B, and 5502-1C at all times those units are in operation.

In order to comply with Conditions D.1.1, D.1.2, and D.1.3, the scrubbers shall be in operation and control particulate emissions from units 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1, 5549-2, 575-2, and 5549-28 at all times those units are in operation.

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

D.1.7 Visible Emissions Notations

- (a) Visible emission notations of exhaust from stacks 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1, 5549-2, 575-2, 5502-7, and 5549-28 shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. A notation of abnormal visible emissions is not a deviation from this permit.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.
- (f) Visible emissions notations of exhaust from stack 5502-7 are not required during scheduled, routine backout events involving the natural gas-fired Regenerative Thermal Oxidizer (RTO), or equivalent control device, used for particulate and opacity control, provided that the Permittee meets the following conditions:
 - (1) The Permittee notifies the OAQ and OES at least twenty-four (24) hours in advance of a bakeout event;
 - (2) The Permittee follows specific bakeout procedures outlined in the Preventive Maintenance Plan (PMP), thereby minimizing emissions during the backout event. Deviations from the procedures in the PMP during bakeout events will require that changes are made to the PMP;

- (3) The Permittee completes bakeout events in an expeditious manner;
- (4) The Permittee documents that bakeout event do not exceed three percent (3%) of the annual operating time of the RTO, or equivalent device; and
- (5) The Permittee keeps records of the date and duration of each bakeout event.

Provided that these conditions are met, the Permittee is allowed a temporary alternative opacity limitation during bakeout events such that opacity shall not exceed sixty percent (60%) for more than a cumulative total of 14 hours in any twenty-four (24) period.

D.1.8 Parametric Monitoring for Scrubbers

- (a) The Permittee shall monitor the pH and flow rate of the of the liquid through the nozzles of the scrubber at least once per week of the scrubber used to control particulate and SO₂ emissions from units 5502-1A through 5502-1C. When, for any one reading, the pH of the liquid used in the scrubber is less than 5.5, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. When, for any one reading, the flow rate through the nozzles of the scrubber is outside the range of 110 to 145 gallons per minute, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pH or flow rate reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.
- (b) The Permittee shall monitor the exhaust air stream pressure drop across the scrubber, and scrubber recirculation rate at least once per week from the scrubbers controlling emissions from units 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1, 5549-2, and 575-2. When, for any one reading, the pressure drop across the scrubber, is outside the range of 6.0 to 12.0 inches of water, or a range established during the last stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. When, for any one reading, the recirculation rate is less than the manufacturer's specifications, or a rate established during the most recent stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure drop or recirculation rate reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.
- (c) The Permittee shall monitor the total static pressure drop across the scrubber at least once daily from the scrubber controlling emissions from unit 5549-28 when 5549-28 is in operation. When, for any one reading, the pressure drop across the scrubber is outside the normal range of 1.0 and 12.0 inches of water, or a range that indicates proper operation of the unit, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.
- (d) The instruments used for determining the pH, pressure drop, or flow rate shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated, maintained, and operated according to the Preventive Maintenance Plan.

D.1.9 Scrubber Inspections

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- (a) An inspection of each scrubber, controlling emissions from units 5502-1A through 5502-1C, 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1, 5549-2, and 575-2, shall be performed each calendar quarter. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.
 - (b) An inspection of the scrubber controlling emissions from 5549-28 shall be performed semi-annually. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.
 - (c) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.1.10 Scrubber Malfunction

In the event that a scrubber malfunction has been observed, the affected unit will be shut down immediately in accordance with safe operating procedures until the failed unit has been repaired or the appropriate components replaced.

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

D.1.11 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1(a)(1), the Permittee shall maintain monthly records of the combined input of corn grind for the units identified in Condition D.1.1(a)(1).
 - (b) To document compliance with Conditions D.1.1(a)(2), the Permittee shall maintain monthly records of the combined input of starch for units 5549-1 and 5549-2.
 - (c) To document compliance with Condition D.1.1(a)(4), the Permittee shall maintain monthly records of the total input of natural gas consumed by 5502-1A, 5502-1B, 5502-1C, and 5502-1D.
 - (d) To document compliance with Condition D.1.1(c), the Permittee shall maintain monthly records of the amount of starch produced by unit 40-3.
 - (e) To document compliance with Condition D.1.3(b), the Permittee shall maintain monthly records of the amount of dry product processed by unit 575-2.
 - (f) To document compliance with Condition D.1.4, the Permittee shall maintain monthly records of the amount of methanol emitting corn starch produced and VOC-containing reagent from unit 575-2.
 - (g) To document compliance with Condition D.1.7, the Permittee shall maintain records of the once per shift visible emission notations of the stack exhaust.
 - (h) To document compliance with Condition D.1.8(a), the Permittee shall maintain weekly records of the pH and flow rate of the scrubbing liquid during normal operations.
 - (i) To document compliance with Condition D.1.8(b), the Permittee shall maintain weekly records of the pressure drop across the scrubber and scrubber recirculation rate during normal operation.
 - (j) To document compliance with Condition D.1.8(c), the Permittee shall maintain daily records of the pressure drop across the scrubber during normal operation.
 - (k) To document compliance with Condition D.1.9, the Permittee shall maintain records of the results of the inspections.

- (l) To document compliance with Condition D.1.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (m) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

Quarterly summaries of the information to document compliance with Conditions D.1.1, D.1.3 and D.1.4 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The reports submitted by the Permittee do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (n) One (1) DSW Bulk Bag Filler, identified as unit 71-9, with emissions controlled by an integral baghouse, and exhausting to stack 71-9.
- (o) One (1) Chilsonator, identified as unit 5552-1, with emissions controlled by an integral baghouse, and exhausting to stack 5552-1.
- (p) One (1) Chilsonator Hopper, identified as unit 5552-2, with emissions controlled by an integral baghouse, and exhausting to stack 5552-2.
- (q) One (1) Truck Loadout Collector, identified as unit 5503-6, constructed in 1999, with emissions controlled by a baghouse, and exhausting to stack 5503-6.
- (r) One (1) Germ Bin, one (1) Pellet Bin #1, one (1) Pellet Bin #2, and one (1) Loadout Dust Collection System, identified as units 5503-2, 5503-3, 5503-4, and 5503-5, respectively, each constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5503-2.
- (s) One (1) DSW Packing Fugitive Dust Collector, identified as unit 71-7, constructed in 1977, with emissions controlled by a baghouse, and exhausting to stack 71-7.
- (t) One (1) RSP North Packing Line, identified as unit 577-2, constructed in 1979 and modified in 2000, with emissions controlled by a baghouse, and exhausting to stack 577-2.
- (u) One (1) Gluten Receiver, identified as unit 5503-1, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5503-1.
- (v) One (1) Pellet Cooler and one (1) Germ Cooler, identified as units 5502-5 and 5502-6, respectively, each constructed in 1997, with emissions controlled by a high efficiency cyclone, and exhausting to stacks 5502-5 and 5502-6 respectively.
- (w) Two (2) Loose Feed Bins, collectively identified as unit 5502-4, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5502-4.
- (x) One (1) Hammer Mill, identified as unit 5502-3, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5502-3.
- (y) One (1) DSE Bag Slitter, identified as unit 42-10, constructed in 1987, with emissions controlled by a baghouse, and exhausting to stack 42-10.
- (z) One (1) P-6 Rework Station, identified as unit 54-1, constructed in 1987, with emissions controlled by a baghouse, and exhausting to stack 54-1.
- (aa) One (1) RSP Hopper #4, identified as unit 577-5, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-5.
- (bb) One (1) RSP Hopper #6, identified as unit 577-6, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-6.

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

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

- (cc) One (1) RSP Hopper #5, identified as unit 577-7, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-7.
- (dd) One (1) RSP Hopper #1, identified as unit 577-8 constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-8.
- (ee) One (1) RSP Hopper #2, identified as unit 577-9, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-9.
- (ff) One (1) RSP Hopper #3, identified as unit 577-10, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-10.
- (gg) One (1) Industrial Packer, identified as unit 71-1, constructed in 1994, with emissions controlled by a baghouse, and exhausting to stack 71-1.
- (hh) Two (2) Spray Dryer Product Receivers, identified as units 5549-3 and 5549-4, constructed in 1993, each with emissions controlled by an integral baghouse, and exhausting to stacks 5549-3 and 5549-4.
- (ii) One (1) #1 Spray Dryer Storage Hopper #1, identified as unit 5549-7, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-7.
- (jj) One (1) #1 Spray Dryer Storage Hopper #2, identified as unit 5549-8, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-8.
- (kk) One (1) #2 Spray Dryer Storage Hopper #3, identified as unit 5549-9, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-9.
- (ll) One (1) #2 Spray Dryer Storage Hopper #4, identified as unit 5549-10, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-10.
- (mm) One (1) Agglomerator Feed Storage Bin, identified as unit 5549-12, constructed in 1995, with emissions controlled by an integral baghouse, and exhausting to stack 5549-12.
- (nn) One (1) Agglomerator, identified as unit 5549-13, constructed in 1995, with emissions controlled by a baghouse, and exhausting to stack 5549-13.
- (oo) One (1) Agglomerator Equipment Aspiration, identified as unit 5549-14, constructed in 1995, with emissions controlled by a baghouse, and exhausting to stack 5549-14.

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

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

(pp) One (1) spray agglomeration process, constructed in 2000, consisting of the following units:

- (1) East Box Packer Filter Receiver, identified as unit 5549-16, with emissions controlled by an integral baghouse, and exhausting to stack 5549-16.
- (2) West Box Packer Filter Receiver, identified as unit 5549-17, with emissions controlled by an integral baghouse, and exhausting to stack 5549-17.
- (3) Line 1 Middle Packer, identified as unit 5549-18, with emissions controlled by an integral baghouse, and exhausting to stack 5549-18.
- (4) Line 1 North Packer, identified as unit 5549-19, with emissions controlled by an integral baghouse, and exhausting to stack 5549-19.
- (5) #2 Fugitive Dust Collector, identified as emission unit 5549-20, with emissions controlled by a baghouse, and exhausting to stack 5549-20.
- (6) Line 1 Packing ambient D/C, identified as unit 5549-21, with emissions controlled by baghouse, and exhausting to stack 5549-21.
- (7) Line 2 Packer, identified as unit 5549-26, with emissions controlled by an integral baghouse, and exhausting to stack 5549-26.

(qq) One (1) West Corn Truck Dump, identified as unit 56-1, constructed before 1968 and modified in 1996, with emissions controlled by a baghouse, and exhausting to stack 56-1.

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

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

D.2.1 Prevention of Significant Deterioration: PM and PM10 Limitations [40 CFR 52.21] [326 IAC 2-2]

- (a) Pursuant to CP 097-0042-97-01, issued March 24, 1997, M 097-00042-99-01, issued February 25, 1999, MSM 097-11764-00042, issued March 10, 2000, and SSM 097-11362-00042, issued August 31, 2000, the following facilities are limited as indicated in the table below:

Unit/ Stack ID	PM/PM ₁₀ Limit (gr/dscf)	PM/PM ₁₀ Limit (lb/hr)	PM/PM ₁₀ Limit (ton/yr)
577-2	0.01	1.29	5.65
577-5	0.009	0.35	1.52
577-6	0.009	0.35	1.52
577-7	0.009	0.35	1.52
577-8	0.009	0.35	1.52
577-9	0.009	0.35	1.52
577-10	0.009	0.35	1.52
5549-3	0.01	0.15	0.64
5549-4	0.01	0.15	0.64

Unit/ Stack ID	PM/PM ₁₀ Limit (gr/dscf)	PM/PM ₁₀ Limit (lb/hr)	PM/PM ₁₀ Limit (ton/yr)
5549-7	0.01	0.039	0.17
5549-8	0.01	0.039	0.17
5549-9	0.01	0.039	0.17
5549-10	0.01	0.039	0.17
5549-12	0.01	0.13	0.57
5549-13	0.01	0.98	4.29
5549-14	0.01	0.24	1.07
5502-3	0.01	0.96	4.212
5502-4	0.01	0.016	0.069
5502-5	0.01	1.13	4.964
5503-1	0.01	1.53	6.69
5503-2 through 5503-5	0.01	0.99	3.11
5503-6 (stack 5503-6)	0.01	1.43	1.148
5502-6	0.01	0.99	4.349
5549-16	0.01	0.02	0.08
5549-17	0.01	0.04	0.15
5549-18	0.01	0.28	1.21
5549-19	0.01	0.24	1.04
5549-20	0.01	0.93	4.05
5549-21	0.01	1.2	5.27
5549-26	0.01	0.26	1.16
71-9	0.01	0.13	0.57
5552-1	0.01	0.03	0.13
5552-2	0.01	0.21	0.9

- (b) The combined input of corn grind to units 5502-1A (Section D.1), 5502-1B (Section D.1), 5502-1D (Section D.1), 5502-3, 5502-4, 5502-5, 5502-6, 5502-7, 5503-1, 5503-2, 5503-3, 5503-4, 5503-5, and 5503-6 shall not exceed 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month. The total emission rate shall not exceed 0.0030 lb PM/PM₁₀ per bushel. Compliance with this limit is equivalent to total PM/PM₁₀ emissions of less than 44.396 tons per year.
- (c) The input of starch to unit 5549-13 shall not exceed 14,010 tons per twelve consecutive month period with compliance determined at the end of each month. The emission rate shall not exceed 0.61 lb PM/PM₁₀ per ton of starch. Compliance with this limit is equivalent to PM/PM₁₀ emissions of less than 4.29 tons per year.
- (d) Facility 5503-6 shall not operate more that 1,602 hours per twelve consecutive month period with compliance determined at the end of each month.

Compliance with these limits will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention Significant Deterioration) not applicable.

D.2.2 Particulate Matter [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the particulate matter emissions from facilities 71-7, 577-2, 54-1, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-10, 5549-12, 5549-13, 5549-14, 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2 through 5503-5, 5503-6, the spray agglomeration process (consisting of units 5549-16 through 5549-21, and 5549-26), 71-9, 5552-1, and 5552-2 shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

Compliance with the limits in Condition D.2.1 for facilities 71-7, 577-2, 54-1, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-10, 5549-12, 5549-13, 5549-14, 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2 through 5503-5, 5503-6, the spray agglomeration process (consisting of units 5549-16 through 5549-21, and 5549-26), 71-9, 5552-1, and 5552-2 will ensure compliance with the requirements of 326 IAC 6-1-2.

D.2.3 Particulate Matter - Marion County [326 IAC 6-1-12]

- (a) Pursuant to 326 IAC 6-1-12, the particulate matter emissions from facility 42-10 shall not exceed 0.03 gr/dscf and 2.4 tons per year.
- (b) Pursuant to 326 IAC 6-1-12, the particulate matter emissions from facility 56-1 shall not exceed 0.02 gr/dscf and 7.02 tons per year.
- (c) Pursuant to 326 IAC 6-1-12, the particulate matter emissions from facility 71-1 shall not exceed 0.03 gr/dscf and 0.9 tons per year.

D.2.4 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 facilities 577-2, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-14, 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2 through 5503-5, 5503-6, 5549-16 through 5549-21, 5549-26, 71-9, 5552-1, and 5552-2 and their respective control devices.

Compliance Determination Requirements

D.2.5 Particulate Control

- (a) In order to comply with Conditions D.2.1, D.2.2, and D.2.3, the respective baghouses for particulate control, including those integral to the process, shall be in operation and control particulate emissions from the respective facilities listed in this section at all times those facilities are in operation.
- (b) In order to comply with Conditions D.2.1 and D.2.2, the high efficiency cyclones for particulate control shall be in operation and control particulate emissions from facilities 5502-5 and 5502-6 at all times the respective facilities are in operation.

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

D.2.6 Visible Emissions Notations

- (a) Visible emission notations of the exhaust from stacks 5549-3, 5549-4, 5503-5, 5503-6, and 5549-13 shall be performed once per shift during normal daylight operations when the respective facilities are in operation. A trained employee shall record whether emissions are normal or abnormal. A notation of abnormal visible emissions is not a deviation from this permit.
- (b) Visible emission notations of the exhaust from stacks 71-9, 5552-1, 5552-2, 5503-2, 5503-3, 5503-4, 577-2, 5503-1, 5502-4, 5502-3, 577-5 through 577-10, 5549-7 through 5549-10, 5549-12, 5549-14, 5549-16 through 5549-21, and 5549-26 shall be performed once per day during normal daylight operations when the respective facilities are in operation. A trained employee shall record whether emissions are normal or abnormal.

- (c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (f) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.

D.2.7 Parametric Monitoring for Baghouses

- (a) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with facilities 5503-5, 5503-6, and 5549-13 at least once per shift when the respective facilities are in operation.
- (b) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with facilities 577-2, 5549-20, 5549-21, 5503-2, 5503-3, and 5503-4 at least once per day when the respective facilities are in operation.
- (c) When, for any one reading, the pressure drop across the baghouses are outside the normal range of 3.0 and 6.0 inches of water or a range established during the last stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.
- (d) The instrument used for measuring the pressure drop shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated, maintained, and operated according to the Preventive Maintenance Plan.

D.2.8 Baghouse Inspections

- (a) An inspection of all bags controlling particulate emissions from facilities 577-2, 5549-20, 5549-21, 5503-2, 5503-3, and 5503-4 shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. Inspections shall also be performed whenever the respective baghouse is out of service for more than 24 consecutive hours. All defective bags shall be replaced.
- (b) An inspection shall be performed each calendar quarter of all bags controlling the particulate emissions from facilities 5503-5, 5503-6, and 5549-13. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.2.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity

violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.2.10 Cyclone Inspections

An inspection shall be performed each calendar quarter of the cyclone controlling the emissions from facilities 5502-5 and 5502-6. Inspections required by this condition shall not be performed in consecutive months.

D.2.11 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.2.12 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1(c), the Permittee shall maintain monthly records of the input of starch for unit 5549-13.
- (b) To document compliance with Condition D.2.1(d), the Permittee shall maintain records of the operating schedule for facility 5503-6.
- (c) To document compliance with Condition D.2.6, the Permittee shall maintain records of the once per shift visible emission notations of the stack exhaust.
- (d) To document compliance with Condition D.2.7, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation.
- (e) To document compliance with Conditions D.2.8 and D.2.10, the Permittee shall maintain records of the results of the inspections.
- (f) To document compliance with Condition D.2.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

The records used to document compliance with Conditions D.1.1 are sufficient to document compliance with Conditions D.2.1(b) and D.2.1(c). See Condition D.1.13.

D.2.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1(c), (b), and (d) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report

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

SECTION D.3

FACILITY OPERATION CONDITIONS

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

(a) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations: [326 IAC 2-7-1(21)(G)(xxiii)]

- (1) One (1) DSE Hopper #9, identified as unit 42-3A; [326 IAC 6-1-12]
- (2) One (1) DSE Hopper #10, identified as unit 42-3B; [326 IAC 6-1-12]
- (3) One (1) DSE Hopper #11, identified as unit 42-3C; [326 IAC 6-1-12]
- (4) One (1) DSE Hopper #12, identified as unit 42-3D; [326 IAC 6-1-12]
- (5) One (1) DSE Hopper #13, identified as unit 42-3E; [326 IAC 6-1-12]
- (6) One (1) DSE Hopper #14, identified as unit 42-3F; [326 IAC 6-1-12]
- (7) One (1) DSE Hopper #2, identified as unit 42-7A; [326 IAC 6-1-12]
- (8) One (1) DSE Hopper #4, identified as unit 42-7B; [326 IAC 6-1-12]
- (9) One (1) DSE Hopper #6, identified as unit 42-7C; [326 IAC 6-1-12]
- (10) One (1) DSE Hopper #1, identified as unit 42-8A; [326 IAC 6-1-2]
- (11) One (1) DSE Hopper #3, identified as unit 42-8B; [326 IAC 6-1-2]
- (12) One (1) DSE Hopper #5, identified as unit 42-8C; [326 IAC 6-1-2]
- (13) One (1) DSE Hopper #7, identified as unit 42-8D; [326 IAC 6-1-2]
- (14) One (1) CWS #8 Mill Receiver; identified as unit 63-1A; [326 IAC 6-1-2]
- (15) One (1) CWS Mill; identified as unit 63-17; [326 IAC 6-1-2]
- (16) One (1) Starch Filter/Receiver 2 Bld 852, identified as unit 152-7; [326 IAC 6-1-2]
- (17) One (1) Starch Mixer 4 Bld 852A Filter Receiver, identified as unit 152-8; [326 IAC 6-1-2]
- (18) One (1) Starch Mixer 4 Bld 852A, identified as unit 152-9; [326 IAC 6-1-2]
- (19) One (1) Starch Mixer 3 Bld 852A Filter Receiver, identified as unit 152-10; [326 IAC 6-1-2]
- (20) One (1) Starch Mixer 3 Bld 852A, identified as unit 152-11; [326 IAC 6-1-2]

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

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

- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: operations M1 through M4 and RSP shop. [326 IAC 3-7-1(21)(G)(vi)(CC)][326 IAC 8-3-3]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 2-7-1(21)(g)(xiii)][326 IAC 6-4]
- (d) Emission units or activities with potential uncontrolled PM10 emissions of less than 5 pounds per hour or 25 pounds per day: [326 IAC 2-7-1(21)(B)]
 - (1) One (1) 152-1 Filter Receiver; [326 IAC 6-1-2]
 - (2) One (1) 152-2 Mixer baghouse; [326 IAC 6-1-2]
 - (3) One (1) 152-3 Starch Cooler Filter Receiver Bld 852; [326 IAC 6-1-2]
 - (4) One (1) 152-4 Starch Mixer 2 Filter/Receiver Bld 852A; [326 IAC 6-1-2]
 - (5) One (1) 152-5 Starch Mixer 2 Bld 852A; [326 IAC 6-1-2]
 - (6) One (1) 152-6 Starch Storage Hopper; [326 IAC 6-1-2]
 - (7) One (1) 128-3 Starch Hopper D/C; [326 IAC 6-1-2]
 - (8) One (1) DSW Chemical Blender Bag Slitter, identified as unit 61-15; [326 IAC 6-1-2]
 - (9) One (1) DSE Hopper #8, identified as unit 42-4; [326 IAC 6-1-12]
 - (10) One (1) Dextrin #1 System Cooler Conveyor, identified as unit 61-3; [326 IAC 6-1-2]
 - (11) One (1) Dextrin Flash Dryer, identified as unit 61-9; [326 IAC 6-1-12]
 - (12) One (1) Dextrin #3 System Cooler, identified as unit 61-22; [326 IAC 6-1-2]
 - (13) One (1) Dextrin #2 System Cooler Conveyor, identified as unit 61-23; [326 IAC 6-1-2]
 - (14) One (1) CWS South Conveying, identified as unit 63-4; [326 IAC 6-1-2]
 - (15) One (1) CWS North Conveying, identified as unit 63-5; [326 IAC 6-1-2]
 - (16) One (1) DSE North Packer, identified as unit 42-1; [326 IAC 6-1-12]
 - (17) One (1) DSE South Packer, identified as unit 42-9; [326 IAC 6-1-2]
 - (18) One (1) sodium sulfate conveying system, identified as unit 40-1; [326 IAC 6-1-2]
 - (19) One (1) DSE Negative Receiver, identified as unit 42-6; [326 IAC 6-1-12]
 - (20) One (1) DSE Railcar Loading - East Track, identified as unit 42-11; [326 IAC 6-1-2]
 - (21) One (1) DSE Railcar Loading - West Track, identified as unit 42-12; [326 IAC 6-1-2]

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

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

- (22) One (1) Dextrin #1 System Mixer, identified as unit 61-1; [326 IAC 6-1-2]
- (23) One (1) Dextrin #1 System Cookers, identified as unit 61-2; [326 IAC 6-1-2]
- (24) One (1) Dextrin #2 System Mixer, identified as unit 61-6; [326 IAC 6-1-12]
- (25) Two (2) Dextrin #2 System East and West Tanks, identified as unit 61-7; [326 IAC 6-1-2]
- (26) One (1) Starch Storage Silo #3 Receiver, identified as unit 61-11; [326 IAC 6-1-2]
- (27) One (1) Starch Storage Silo #1 Receiver, identified as unit 61-12; [326 IAC 6-1-2]
- (28) One (1) Starch Storage Silo #1, identified as unit 61-13; [326 IAC 6-1-2]
- (29) One (1) Dextrin #1 System Packer, identified as unit 61-14; [326 IAC 6-1-12]
- (30) One (1) DSW Chemical Blender Tank; identified as unit 61-14A; [326 IAC 6-1-12]
- (31) One (1) Dextrin System Acidifiers; identified as unit 61-16; [326 IAC 6-1-2]
- (32) One (1) Dextrin #2 System Cooler; identified as unit 61-18; [326 IAC 6-1-2]
- (33) One (1) Dextrin #3 System Cookers; identified as unit 61-19; [326 IAC 6-1-2]
- (34) One (1) Starch Storage Silo #2; identified as unit 61-20; [326 IAC 6-1-2]
- (35) One (1) Starch Storage Silo #2 Receiver; identified as unit 61-21; [326 IAC 6-1-2]
- (36) One (1) Dextrin #3 System Mixer; identified as unit 61-24; [326 IAC 6-1-2]
- (37) One (1) Dextrin #3 System West Tank; identified as unit 61-25; [326 IAC 6-1-2]
- (38) One (1) Dextrin #3 System East Tank; identified as unit 61-26; [326 IAC 6-1-2]
- (39) One (1) Grain Elevator, identified as unit 56-2; [326 IAC 6-1-12]
- (40) One (1) CWS #7 Dryer Receiver; identified as unit 63-3; [326 IAC 6-1-2]
- (41) One (1) CWS Packer; identified as unit 63-9; [326 IAC 6-1-2]
- (42) One (1) Liquid Glue Bag Dump; identified as unit 63-12; [326 IAC 6-1-2]
- (43) One (1) CWS #9 and #10 Dryers Receiver; identified as unit 63-15; [326 IAC 6-1-2]
- (44) One (1) CWS #11, #12, and #13 Dryers; identified as unit 63-16; [326 IAC 6-1-2]
- (45) One (1) Starch Hopper D/C, identified as unit 128-3; [326 IAC 6-1-2]
- (46) One (1) CWS South Raw Material Dump; identified as unit 63-18; [326 IAC 6-1-2]

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

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

- (47) One (1) DSW Negative Receiver; identified as unit 63-20; [326 IAC 6-1-2]
- (48) Two (2) DSW Hoppers #17 and #18; identified as unit 71-2; [326 IAC 6-1-12]
- (49) One (1) Dextrin Packer; identified as unit 71-3; [326 IAC 6-1-2]
- (50) One (1) DSW Hopper #13, identified as unit 71-4A; [326 IAC 6-1-12]
- (51) One (1) DSW Hopper #1; identified as unit 71-5A; [326 IAC 6-1-12]
- (52) One (1) DSW Hopper #2; identified as unit 71-5B; [326 IAC 6-1-12]
- (53) One (1) DSW Hopper #3; identified as unit 71-5C; [326 IAC 6-1-12]
- (54) One (1) DSW Hopper #4; identified as unit 71-5D; [326 IAC 6-1-12]
- (55) One (1) DSW Hopper #5; identified as unit 71-5E; [326 IAC 6-1-12]
- (56) One (1) DSW Hopper #6; identified as unit 71-5F; [326 IAC 6-1-12]
- (57) One (1) DSW Hopper #7; identified as unit 71-5G; [326 IAC 6-1-12]
- (58) One (1) DSW Hopper #8; identified as unit 71-5H; [326 IAC 6-1-12]
- (59) One (1) DSW Hopper #9; identified as unit 71-5I; [326 IAC 6-1-12]
- (60) One (1) DSW Hopper #10; identified as unit 71-5J; [326 IAC 6-1-12]
- (61) One (1) DSW Hopper #11; identified as unit 71-5K; [326 IAC 6-1-12]
- (62) One (1) DSW Hopper #12; identified as unit 71-5L; [326 IAC 6-1-12]
- (63) One (1) DSW Bulk Car Loading; identified as unit 71-8; [326 IAC 6-1-2]
- (64) One (1) RSP Bulk Bag Packing; identified as unit 577-1; [326 IAC 6-1-2]
- (65) One (1) RSP Bulk Loading System A; identified as unit 577-4; [326 IAC 6-1-2]
- (66) One (1) RSP Bulk Loading Fugitive Dust Collector; identified as unit 577-4A; [326 IAC 6-1-2]
- (67) One (1) CWS Packing Hopper; identified as unit 578-2; [326 IAC 6-1-2]
- (68) One (1) CWS Bagging Line, identified as unit 578-1; [326 IAC 6-1-2]
- (69) One (1) CWS Milling System, identified as unit 578-3; [326 IAC 6-1-2]
- (70) One (1) CATO Cooling and Conveying, identified as unit 581-2; [326 IAC 6-1-2]
- (71) One (1) RSP South Packing Line, identified as unit 577-3; [326 IAC 6-1-2]

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

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

D.3.1 Particulate Matter [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the particulate matter emissions from all insignificant activities listed above which have a potential to emit PM, and are not subject to the requirements of 326 IAC 6-1-12, shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

D.3.2 Particulate Matter - Marion County [326 IAC 6-1-12]

Pursuant to 326 IAC 6-1-12, the following insignificant activities are limited as indicated in the table below:

Facility	PM Limit (gr/dscf)	PM Limit (ton/yr)
56-2	0.01	11.3
71-2	0.03	2.6
61-6	0.03	0.1
61-14A	0.029	0.6
61-14	0.028	1.2
42-4	0.029	2.3
61-9	0.016	4.1
42-1	0.03	0.9
42-6	0.03	2.5
42-8	0.03	4.2
42-7A	0.032	1.7
42-7B	0.032	1.7
42-7C	0.032	1.7
42-3A	0.032	1.8
42-3B	0.032	1.8
42-3C	0.032	1.8
42-3D	0.032	1.8
42-3E	0.032	1.8
42-3F	0.032	1.8
71-4A	0.03	0.3
71-5A	0.026	0.3
71-5B	0.026	0.3
71-5C	0.026	0.3
71-5D	0.026	0.3
71-5E	0.026	0.3
71-5F	0.026	0.3
71-5G	0.026	0.3

Facility	PM Limit (gr/dscf)	PM Limit (ton/yr)
71-5H	0.026	0.3
71-5I	0.026	0.3
71-5J	0.026	0.3
71-5K	0.026	0.3
71-5L	0.026	0.3

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning degreasing operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements; and
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination Requirements

D.3.5 Particulate Control

In order to comply with Conditions D.3.1 and D.3.2, the baghouses for particulate control, including those integral to the process, shall be in operation and control particulate emissions from all facilities listed in this section at all times those respective facilities are in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

and

**City of Indianapolis
Office of Environmental Services**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: National Starch and Chemical Company
Source Address: 1515 South Drover Street, Indianapolis, IN 46221
Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
Part 70 Permit No.: T097-7714-00042

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

and

City of Indianapolis Office of Environmental Services

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: National Starch and Chemical Company
Source Address: 1515 South Drover Street, Indianapolis, IN 46221
Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
Part 70 Permit No.: T097-7714-00042

This form consists of 2 pages

Page 1 of 2

- ☛ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 Compliance Data Section
 and
 City of Indianapolis
 Office of Environmental Services**

Part 70 Quarterly Report

Source Name: National Starch and Chemical Company
 Source Address: 1515 South Drover Street, Indianapolis, IN 46221
 Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
 Part 70 Permit No.: T097-7714-00042
 Facilities: 5502-1A, 5502-1B, 5502-1D, 5502-3, 5502-4, 5502-5, 5502-6, 5502-7, 5503-1, 5503-2, 5503-3, 5503-4, and 5503-5
 Parameter: Combined input of corn grind
 Limit: 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Corn grind (bushels)	Corn grind (bushels)	Corn grind (bushels)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section
and
City of Indianapolis
Office of Environmental Services**

Part 70 Quarterly Report

Source Name: National Starch and Chemical Company
Source Address: 1515 South Drover Street, Indianapolis, IN 46221
Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
Part 70 Permit No.: T097-7714-00042
Facilities: 5549-1 and 5549-2
Parameter: Combined input of starch
Limit: 22,500 tons per twelve consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Starch (tons)	Starch (tons)	Starch (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 Compliance Data Section
 and
 City of Indianapolis
 Office of Environmental Services**

Part 70 Quarterly Report

Source Name: National Starch and Chemical Company
 Source Address: 1515 South Drover Street, Indianapolis, IN 46221
 Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
 Part 70 Permit No.: T097-7714-00042
 Facilities: 5502-1A, 5502-1B, 5502-1C, and 5502-1D
 Parameter: Total natural gas usage
 Limit: The combined input of natural gas to 5502-1A, 5502-1B, 5502-1C, and 5502-1D shall not exceed 1,851 million cubic feet (MMcf) per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit is equivalent to total NO_x emissions of less than or equal to 39 tons per twelve consecutive month period.

YEAR: _____

Month	Natural Gas (MMscf)	Natural Gas (MMscf)	Natural Gas (MMscf)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 Compliance Data Section
 and
 City of Indianapolis
 Office of Environmental Services**

Part 70 Quarterly Report

Source Name: National Starch and Chemical Company
 Source Address: 1515 South Drover Street, Indianapolis, IN 46221
 Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
 Part 70 Permit No.: T097-7714-00042
 Facilities: 5549-13
 Parameter: Input of starch
 Limit: 14,010 tons per twelve consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Starch (tons)	Starch (tons)	Starch (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section
and
City of Indianapolis
Office of Environmental Services**

Part 70 Quarterly Report

Source Name: National Starch and Chemical Company
Source Address: 1515 South Drover Street, Indianapolis, IN 46221
Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
Part 70 Permit No.: T097-7714-00042
Facility: 575-2
Parameter: Amount of dry product processed
Limit: 123,300 tons per hour per twelve consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Dry product (tons)	Dry product (tons)	Dry product (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 Compliance Data Section
 and
 City of Indianapolis
 Office of Environmental Services**

Part 70 Quarterly Report

Source Name: National Starch and Chemical Company
 Source Address: 1515 South Drover Street, Indianapolis, IN 46221
 Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
 Part 70 Permit No.: T097-7714-00042
 Facility: 40-3
 Parameter: Amount of starch produced
 Limit: 145,610 tons per twelve consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Starch produced (tons)	Starch produced (tons)	Starch produced (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 Compliance Data Section
 and
 City of Indianapolis
 Office of Environmental Services**

Part 70 Quarterly Report

Source Name: National Starch and Chemical Company
 Source Address: 1515 South Drover Street, Indianapolis, IN 46221
 Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
 Part 70 Permit No.: T097-7714-00042
 Facility: 575-2
 Parameter: Amounts of methanol emitting corn starch and VOC-containing reagent
 Limit: 11,995,200 pounds per twelve consecutive month period with compliance determined at the end of each month and less than 0.0041 lb VOC per lb of starch produced

YEAR: _____

Month	Starch (lb)	VOC reagent (lb)	Starch (lb)	VOC reagent (lb)	Starch (lb)	VOC reagent (lb)
	This Month	This month	Previous 11 Months	Previous 11 Months	12 Month Total	12 Month Total
Month 1						
Month 2						
Month 3						

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section
and
City of Indianapolis
Office of Environmental Services**

Part 70 Quarterly Report

Source Name: National Starch and Chemical Company
Source Address: 1515 South Drover Street, Indianapolis, IN 46221
Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
Part 70 Permit No.: T097-7714-00042
Facility: 5503-6
Parameter: Hours of operation
Limit: Facility 5503-6 shall not operate more that 1,602 hours per twelve consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Operating hours	Operating hours	Operating hours
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section
and
City of Indianapolis
Office of Environmental Services**

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

Source Name: National Starch and Chemical Company
Source Address: 1515 South Drover Street, Indianapolis, IN 46221
Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
Part 70 Permit No.: T097-7714-00042

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
<input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

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

Source Background and Description

Source Name: National Starch and Chemical Company
Source Location: 1515 South Drover Street, Indianapolis, IN 46221
County: Marion
SIC Code: 2046
Operation Permit No.: T097-7714-00042
Permit Reviewer: ERG/BS

The Indiana Department of Environmental Management, Office of Air Quality (IDEM, OAQ) and the City of Indianapolis, Office of Environmental Services (OES) have reviewed a Part 70 permit application from National Starch and Chemical Company relating to the operation of a stationary wet corn milling plant which produces feed, gluten meal, germ meal, and heavy steepwater.

History

The National Starch and Chemical Company plant located in Indianapolis, Indiana ("National Starch") was originally constructed in the 1960s.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices (Note that the maximum process capacities of these units have been included in an OAQ confidential file):

- (a) One (1) natural gas-fired #1 Starch Flash Dryer, identified as unit 40-4, constructed in 1965 and modified in 1994, a maximum heat input capacity of 30 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 40-4.
- (b) One (1) natural gas-fired #2 Starch Flash Dryer, identified as unit 40-3, constructed in 1967 and modified in 1994 and 1999, a maximum heat input capacity of 36 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 40-3.
- (c) One (1) natural gas-fired #3 Starch Flash Dryer, identified as unit 40-2, constructed in 1971, a maximum heat input capacity of 36 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 40-2.
- (d) One (1) natural gas-fired #4 Starch Flash Dryer, identified as unit 575-1, constructed in 1977, a maximum heat input capacity of 43 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 575-1.

- (e) One (1) natural gas-fired #6 Starch Flash Dryer, identified as unit 575-3, constructed in 1993, a maximum heat input capacity of 40 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 575-3.
- (f) One (1) natural gas-fired #1 Spray Dryer, identified as unit 5549-1, constructed in 1993 and modified in 1998, a maximum heat input capacity of 25 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 5549-1.
- (g) One (1) natural gas-fired #2 Spray Dryer, identified as unit 5549-2, constructed in 1993 and modified in 1998, with a maximum heat input capacity of 25 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 5549-2.
- (h) One (1) natural gas-fired #5 Starch Flash Dryer, identified as unit 575-2, constructed in 1979 and replaced in 1995, with a maximum heat input capacity of 38 MMBtu/hr, emissions controlled by a wet scrubber, and exhausting to stack 575-2.
- (i) One (1) natural gas-fired Feed Dryer, identified as unit 5502-1A, constructed in 1997, a maximum heat input capacity of 77 MMBtu/hr, with emissions controlled by a wet scrubber, and exhausting to the inlet of unit 5502-1D.
- (j) One (1) natural gas-fired Germ Dryer, identified as unit 5502-1B, constructed in 1997, a maximum heat input capacity of 24 MMBtu/hr, with emissions controlled by a wet scrubber, and exhausting to the inlet of unit 5502-1D.
- (k) One (1) natural gas-fired Gluten Dryer, identified as unit 5502-1C, constructed in 1997, a maximum heat input capacity of 32 MMBtu/hr, with emissions controlled by a wet scrubber, and exhausting to the inlet of unit 5502-1D.
- (l) One (1) natural gas-fired Regenerative Thermal Oxidizer, identified as unit 5502-1D, constructed in 1997, a maximum heat input capacity of 18 MMBtu/hr, used for particulate and opacity control, and exhausting to stack 5502-7.
- (m) Spray Agglomerator #3, identified as unit 5549-28, part of the spray agglomeration process, a maximum heat input capacity of 16.5 MMBtu/hr, with emissions controlled by a wet scrubber, and exhausting to stack 5549-28.
- (n) One (1) DSW Bulk Bag Filler, identified as unit 71-9, with emissions controlled by an integral baghouse, and exhausting to stack 71-9.
- (o) One (1) Chilsonator, identified as unit 5552-1, with emissions controlled by an integral baghouse, and exhausting to stack 5552-1.
- (p) One (1) Chilsonator Hopper, identified as unit 5552-2, with emissions controlled by an integral baghouse, and exhausting to stack 5552-2.
- (q) One (1) Truck Loadout Collector, identified as unit 5503-6, constructed in 1999, with emissions controlled by a baghouse, and exhausting to stack 5503-6.
- (r) One (1) Germ Bin, one (1) Pellet Bin #1, one (1) Pellet Bin #2, and one (1) Loadout Dust Collection System, identified as units 5503-2, 5503-3, 5503-4, and 5503-5, respectively, each constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5503-2.
- (s) One (1) DSW Packing Fugitive Dust Collector, identified as unit 71-7, constructed in 1977, with emissions controlled by a baghouse, and exhausting to stack 71-7.

- (t) One (1) RSP North Packing Line, identified as unit 577-2, constructed in 1979 and modified in 2000, with emissions controlled by a baghouse, and exhausting to stack 577-2.
- (u) One (1) Gluten Receiver, identified as unit 5503-1, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5503-1.
- (v) One (1) Pellet Cooler, identified as unit 5502-5, constructed in 1997, with emissions controlled by a high efficiency cyclone (exhausting to stack 5502-6), and exhausting to stack 5502-5.
- (w) Two (2) Loose Feed Bins, collectively identified as unit 5502-4, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5502-4.
- (x) One (1) Hammer Mill, identified as unit 5502-3, constructed in 1997, with emissions controlled by a baghouse, and exhausting to stack 5502-3.
- (y) One (1) DSE Bag Slitter, identified as unit 42-10, constructed in 1987, with emissions controlled by a baghouse, and exhausting to stack 42-10.
- (z) One (1) P-6 Rework Station, identified as unit 54-1, constructed in 1987, with emissions controlled by a baghouse, and exhausting to stack 54-1.
- (aa) One (1) RSP Hopper #4, identified as unit 577-5, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-5.
- (bb) One (1) RSP Hopper #6, identified as unit 577-6, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-6.
- (cc) One (1) RSP Hopper #5, identified as unit 577-7, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-7.
- (dd) One (1) RSP Hopper #1, identified as unit 577-8 constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-8.
- (ee) One (1) RSP Hopper #2, identified as unit 577-9, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-9.
- (ff) One (1) RSP Hopper #3, identified as unit 577-10, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 577-10.
- (gg) One (1) Industrial Packer, identified as unit 71-1, constructed in 1994, with emissions controlled by a baghouse, and exhausting to stack 71-1.
- (hh) Two (2) Spray Dryer Product Receivers, identified as units 5549-3 and 5549-4, constructed in 1993, each with emissions controlled by an integral baghouse, and exhausting to stacks 5549-3 and 5549-4.
- (ii) One (1) #1 Spray Dryer Storage Hopper #1, identified as unit 5549-7, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-7.
- (jj) One (1) #1 Spray Dryer Storage Hopper #2, identified as unit 5549-8, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-8.
- (kk) One (1) #2 Spray Dryer Storage Hopper #3, identified as unit 5549-9, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-9.

- (ll) One (1) #2 Spray Dryer Storage Hopper #4, identified as unit 5549-10, constructed in 1993, with emissions controlled by an integral baghouse, and exhausting to stack 5549-10.
- (mm) One (1) Agglomerator Feed Storage Bin, identified as unit 5549-12, constructed in 1995, with emissions controlled by an integral baghouse, and exhausting to stack 5549-12.
- (nn) One (1) Agglomerator, identified as unit 5549-13, constructed in 1995, with emissions controlled by a baghouse, and exhausting to stack 5549-13.
- (oo) One (1) Agglomerator Equipment Aspiration, identified as unit 5549-14, constructed in 1995, with emissions controlled by a baghouse, and exhausting to stack 5549-14.
- (pp) One (1) spray agglomeration process, constructed in 2000, consisting of the following units:
 - (1) East Box Packer Filter Receiver, identified as unit 5549-16, with emissions controlled by an integral baghouse, and exhausting to stack 5549-16.
 - (2) West Box Packer Filter Receiver, identified as unit 5549-17, with emissions controlled by an integral baghouse, and exhausting to stack 5549-17.
 - (3) Line 1 Middle Packer, identified as unit 5549-18, with emissions controlled by an integral baghouse, and exhausting to stack 5549-18.
 - (4) Line 1 North Packer, identified as unit 5549-19, with emissions controlled by an integral baghouse, and exhausting to stack 5549-19.
 - (5) #2 Fugitive Dust Collector, identified as emission unit 5549-20, with emissions controlled by a baghouse, and exhausting to stack 5549-20.
 - (6) Line 1 Packing ambient D/C, identified as unit 5549-21, with emissions controlled by baghouse, and exhausting to stack 5549-21.
 - (7) Line 2 Packer, identified as unit 5549-26, with emissions controlled by an integral baghouse, and exhausting to stack 5549-26.
- (qq) One (1) West Corn Truck Dump, identified as unit 56-1, constructed before 1968 and modified in 1996, with emissions controlled by a baghouse, and exhausting to stack 56-1.

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) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations:
 - (1) One (1) sodium sulfate conveying system, identified as unit 40-1; [326 IAC 6-1-2]
 - (2) One (1) DSE Hopper #9, identified as unit 42-3A; [326 IAC 6-1-12]

- (3) One (1) DSE Hopper #10, identified as unit 42-3B; [326 IAC 6-1-12]
- (4) One (1) DSE Hopper #11, identified as unit 42-3C; [326 IAC 6-1-12]
- (5) One (1) DSE Hopper #12, identified as unit 42-3D; [326 IAC 6-1-12]
- (6) One (1) DSE Hopper #13, identified as unit 42-3E; [326 IAC 6-1-12]
- (7) One (1) DSE Hopper #14, identified as unit 42-3F; [326 IAC 6-1-12]
- (8) One (1) DSE Negative Receiver, identified as unit 42-6; [326 IAC 6-1-12]
- (9) One (1) DSE Hopper #2, identified as unit 42-7A; [326 IAC 6-1-12]
- (10) One (1) DSE Hopper #4, identified as unit 42-7B; [326 IAC 6-1-12]
- (11) One (1) DSE Hopper #6, identified as unit 42-7C; [326 IAC 6-1-12]
- (12) One (1) DSE Hopper #1, identified as unit 42-8A; [326 IAC 6-1-2]
- (13) One (1) DSE Hopper #3, identified as unit 42-8B; [326 IAC 6-1-2]
- (14) One (1) DSE Hopper #5, identified as unit 42-8C; [326 IAC 6-1-2]
- (15) One (1) DSE Hopper #7, identified as unit 42-8D; [326 IAC 6-1-2]
- (16) One (1) CWS Packing Hopper; identified as unit 578-2; [326 IAC 6-1-2]
- (17) One (1) Starch Hopper D/C, identified as unit 128-3; [326 IAC 6-1-2]
- (18) One (1) DSE Railcar Loading - East Track, identified as unit 42-11; [326 IAC 6-1-2]
- (19) One (1) DSE Railcar Loading - West Track, identified as unit 42-12; [326 IAC 6-1-2]
- (20) One (1) RSP Bulk Loading Fugitive Dust Collector; identified as unit 577-4A; [326 IAC 6-1-2]
- (21) One (1) Grain Elevator, identified as unit 56-2; [326 IAC 6-1-12]
- (22) One (1) Dextrin #1 System Mixer, identified as unit 61-1; [326 IAC 6-1-2]
- (23) One (1) Dextrin #1 System Cookers, identified as unit 61-2; [326 IAC 6-1-2]
- (24) One (1) Dextrin #2 System Mixer, identified as unit 61-6; [326 IAC 6-1-12]
- (25) Two (2) Dextrin #2 System East and West Tanks, identified as unit 61-7; [326 IAC 6-1-2]
- (26) One (1) Starch Storage Silo #3 Receiver, identified as unit 61-11; [326 IAC 6-1-2]
- (27) One (1) Starch Storage Silo #1 Receiver, identified as unit 61-12; [326 IAC 6-1-2]
- (28) One (1) Starch Storage Silo #1, identified as unit 61-13; [326 IAC 6-1-2]
- (29) One (1) Dextrin #1 System Packer, identified as unit 61-14; [326 IAC 6-1-12]

- (30) One (1) DSW Chemical Blender Tank; identified as unit 61-14A; [326 IAC 6-1-12]
- (31) One (1) Dextrin System Acidifiers; identified as unit 61-16; [326 IAC 6-1-2]
- (32) One (1) Dextrin #2 System Cooler; identified as unit 61-18; [326 IAC 6-1-2]
- (33) One (1) Dextrin #3 System Cookers; identified as unit 61-19; [326 IAC 6-1-2]
- (34) One (1) Starch Storage Silo #2; identified as unit 61-20; [326 IAC 6-1-2]
- (35) One (1) Starch Storage Silo #2 Receiver; identified as unit 61-21; [326 IAC 6-1-2]
- (36) One (1) Dextrin #3 System Mixer; identified as unit 61-24; [326 IAC 6-1-2]
- (37) One (1) Dextrin #3 System West Tank; identified as unit 61-25; [326 IAC 6-1-2]
- (38) One (1) Dextrin #3 System East Tank; identified as unit 61-26; [326 IAC 6-1-2]
- (39) One (1) CWS #8 Mill Receiver; identified as unit 63-1A; [326 IAC 6-1-2]
- (40) One (1) CWS #7 Dryer Receiver; identified as unit 63-3; [326 IAC 6-1-2]
- (41) One (1) CWS Packer; identified as unit 63-9; [326 IAC 6-1-2]
- (42) One (1) Liquid Glue Bag Dump; identified as unit 63-12; [326 IAC 6-1-2]
- (43) One (1) CWS #9 and #10 Dryers Receiver; identified as unit 63-15; [326 IAC 6-1-2]
- (44) One (1) CWS #11, #12, and #13 Dryers; identified as unit 63-16; [326 IAC 6-1-2]
- (45) One (1) CWS Mill; identified as unit 63-17; [326 IAC 6-1-2]
- (46) One (1) CWS South Raw Material Dump; identified as unit 63-18; [326 IAC 6-1-2]
- (47) One (1) DSW Negative Receiver; identified as unit 63-20; [326 IAC 6-1-2]
- (48) Two (2) DSW Hoppers #17 and #18; identified as unit 71-2; [326 IAC 6-1-12]
- (49) One (1) Dextrin Packer; identified as unit 71-3; [326 IAC 6-1-2]
- (50) One (1) DSW Hopper #13, identified as unit 71-4A; [326 IAC 6-1-12]
- (51) One (1) DSW Hopper #1; identified as unit 71-5A; [326 IAC 6-1-12]
- (52) One (1) DSW Hopper #2; identified as unit 71-5B; [326 IAC 6-1-12]
- (53) One (1) DSW Hopper #3; identified as unit 71-5C; [326 IAC 6-1-12]
- (54) One (1) DSW Hopper #4; identified as unit 71-5D; [326 IAC 6-1-12]
- (55) One (1) DSW Hopper #5; identified as unit 71-5E; [326 IAC 6-1-12]
- (56) One (1) DSW Hopper #6; identified as unit 71-5F; [326 IAC 6-1-12]
- (57) One (1) DSW Hopper #7; identified as unit 71-5G; [326 IAC 6-1-12]
- (58) One (1) DSW Hopper #8; identified as unit 71-5H; [326 IAC 6-1-12]

- (59) One (1) DSW Hopper #9; identified as unit 71-5I; [326 IAC 6-1-12]
- (60) One (1) DSW Hopper #10; identified as unit 71-5J; [326 IAC 6-1-12]
- (61) One (1) DSW Hopper #11; identified as unit 71-5K; [326 IAC 6-1-12]
- (62) One (1) DSW Hopper #12; identified as unit 71-5L; [326 IAC 6-1-12]

- (63) One (1) DSW Bulk Car Loading; identified as unit 71-8; [326 IAC 6-1-2]
- (64) One (1) RSP Bulk Bag Packing; identified as unit 577-1; [326 IAC 6-1-2]
- (65) One (1) RSP Bulk Loading System A; identified as unit 577-4; [326 IAC 6-1-2]

- (b) Degreasing operations that do not exceed 145 gallons per 12 months, and are not subject to 326 IAC 20-6: operations M1 through M4 and RSP shop. [326 IAC 8-3-3]

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

- (d) Emission units or activities with potential uncontrolled PM10 emissions of less than 5 pounds per hour or 25 pounds per day:
 - (1) One (1) 152-1 Filter Receiver; [326 IAC 6-1-2]
 - (2) One (1) 152-2 Mixer baghouse; [326 IAC 6-1-2]
 - (3) One (1) 152-3 Starch Cooler Filter Receiver Bld 852; [326 IAC 6-1-2]
 - (4) One (1) 152-4 Starch Mixer 2 Filter/Receiver Bld 852A; [326 IAC 6-1-2]
 - (5) One (1) 152-5 Starch Mixer 2 Bld 852A; [326 IAC 6-1-2]
 - (6) One (1) 152-6 Starch Storage Hopper; [326 IAC 6-1-2]
 - (7) One (1) 128-3 Starch Hopper D/C; [326 IAC 6-1-2]
 - (8) One (1) DSW Chemical Blender Bag Slitter, identified as unit 61-15; [326 IAC 6-1-2]
 - (9) One (1) DSE Hopper #8, identified as unit 42-4; [326 IAC 6-1-12]
 - (10) One (1) Dextrin #1 System Cooler Conveyor, identified as unit 61-3; [326 IAC 6-1-2]
 - (11) One (1) Dextrin Flash Dryer, identified as unit 61-9; [326 IAC 6-1-12]
 - (12) One (1) Dextrin #3 System Cooler, identified as unit 61-22; [326 IAC 6-1-2]
 - (13) One (1) Dextrin #2 System Cooler Conveyor, identified as unit 61-23; [326 IAC 6-1-2]
 - (14) One (1) CWS Bagging Line, identified as unit 578-1; [326 IAC 6-1-2]
 - (15) One (1) CWS Milling System, identified as unit 578-3; [326 IAC 6-1-2]
 - (16) One (1) CATO Cooling and Conveying, identified as unit 581-2; [326 IAC 6-1-2]

- (17) One (1) RSP South Packing Line, identified as unit 577-3; [326 IAC 6-1-2]
- (18) One (1) CWS South Conveying, identified as unit 63-4; [326 IAC 6-1-2]
- (19) One (1) CWS North Conveying, identified as unit 63-5; [326 IAC 6-1-2]
- (20) One (1) DSE North Packer, identified as unit 42-1; [326 IAC 6-1-12]
- (21) One (1) DSE South Packer, identified as unit 42-9; [326 IAC 6-1-2]
- (e) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (f) 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.
- (g) VOC and HAP storage containers as indicated by 326 IAC 2-7-1(21)(G).
- (h) Equipment used exclusively for filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (i) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (j) Cleaners and solvents as indicated by 326 IAC 2-7-1(21)(G).
- (k) Closed loop heating and cooling systems.
- (l) Any operation using aqueous solutions containing less than 1% by weight VOCs excluding HAPs.
- (m) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (n) Noncontact, forced and induced, draft cooling tower system not regulated under a NESHAP.
- (o) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (p) Heat exchanger cleaning and repair.
- (q) Process vessel degassing and cleaning to prepare for internal repairs.
- (r) Underground conveyors.
- (s) Asbestos abatement projects regulated by 326 IAC 14-10.
- (t) Purging of gas lines and vessels that are related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (u) 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.

- (v) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (w) On-site fire and emergency response training approved by the department.
- (x) Emergency generators as follows: gasoline generators not exceeding 110 horsepower; diesel generators not exceeding 1600 horsepower; natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.
- (y) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (z) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 10 tons per year SO₂, NO_x, or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs:
 - (1) four (4) hydrochloric acid storage tanks;
 - (2) all vessels and equipment in the Process A Mill House and Tank House, West Mill House, West Tanks House, and Raymond Street Plant Tank House;
 - (3) one (1) acetic anhydride storage tank;
 - (4) one (1) QUAT storage tank;
 - (5) one (1) DEC storage tank,
 - (6) One (1) propylene oxide storage tank, identified as unit 40-5, constructed in 1972, with a vapor recovery system and nitrogen blanket.
- (aa) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

Note that insignificant activities (e) through (aa) are not specifically regulated and are therefore not listed in the Part 70 permit.

Air Pollution Control Justification as an Integral Part of the Process

- (a) While under review for a Part 70 permit, the company submitted the following justification that the baghouses that operate in conjunction with units 71-9, 71-8, 71-5L, 71-5K, 71-5J, 71-5I, 71-5H, 71-5G, 71-5F, 71-5E, 71-5D, 71-5C, 71-5B, 71-5A, 71-2, 71-3, 71-4, 63-9, 63-5, 63-4, 63-3, 63-20, 63-1A, 63-16, 63-15, 61-7, 61-3, 61-25, 61-20, 61-21, 61-22, 61-23, 61-2, 61-19, 61-18, 61-16, 61-14A, 61-13, 61-12, 61-11, 581-1, 578-3, 578-2, 577-9, 577-8, 577-7, 577-6, 577-5, 577-4, 577-3, 577-10, 577-1, 5552-1, 5552-2, 5549-3, 5549-4, 5549-7, 5549-8, 5549-9, 5549-10, 5549-12, 5549-16, 5549-17, 5549-18, 5549-19, 5549-26, 42-9, 42-8, 42-7A, 42-7B, 42-7C, 42-6, 42-4, 42-3A, 42-3B, 42-3C, 42-3D, 42-3E, 42-3F, 42-11, 42-12, 42-13, 42-1, 40-1, 152-1, 152-3, 152-4, 152-5, and 128-3 be considered as an integral part of the milling of wet corn:

These baghouses primarily serve as air/product separators for pneumatically conveyed dry starch & feed products. They do not follow product separator cyclones, which serve the same purpose, so the process can not function without the baghouses. It is in the source's best business interest to collect and recycle as much material as possible as the saleable product at the facility is dry starch & feed. These units generally provide a 99+% collection efficiency and are relatively insensitive to changes in product loadings making them the best available equipment for handling fine particulate products. As a result, the baghouses used as product collectors operate in series with their respective facilities and serve a primary purpose other than pollution control.

IDEM, OAQ has evaluated the justifications and determined that the aforementioned baghouses, used as air/product separators for pneumatically conveyed dry products, are an integral part of the milling of wet corn. Therefore, the permitting level will be determined using the potential to emit after these baghouses. The determination that these baghouses are integral to the process was made during the Part 70 review process.

- (b) While under review for a Part 70 permit, the company submitted the following justification that the baghouses that operate in conjunction with units 61-6, 61-24, 61-1, and 152-2 be considered as an integral part of the milling of wet corn:

These baghouses: 1) recover product that has become entrained in the air during mixer loading and return the captured product to the mixers, and 2) relieve the displaced air from filling. Prior to delivery to the mixers, the product has already been re-dried and chemically treated, so a significant cost is associated with this material at this stage of the process. The payback period for these baghouses is less than one year. These units generally provide a 99+% collection efficiency and are relatively insensitive to changes in product loadings; making them the best available equipment for handling fine particulate products.

IDEM, OAQ has evaluated the justifications and determined that the aforementioned baghouses, used for product recovery from mixer loading, are an integral part of the milling of wet corn. Therefore, the permitting level will be determined using the potential to emit after these baghouses. The determination that these baghouses are integral to the process was made during the Part 70 review process.

- (c) While under review for a Part 70 permit, the company submitted the following justification that the baghouse that operates in conjunction with unit 61-9 be considered as an integral part of the milling of wet corn:

The product from the Dextrin Flash Dryer (61-9) is routed to a cyclone for product recovery. The exhaust stream from the cyclone is in turn routed to a baghouse for further product recovery. The dryer is used to reduce the moisture in the starch powder which lessens processing time and reduces overall energy use and therefore operating costs. The cyclone provides about 90% product recovery while the baghouse provides 99.9+% product recovery of the 10% not collected by the cyclone. The low moisture of the product exiting the dryer allows for the use of a baghouse to recover what the cyclone could not. This baghouse has the smallest particle specification of all our starches to ensure nearly 100% capture and collection of the product. Because of the powder particle size, the baghouse is necessary for product recovery and has an overwhelmingly positive net economic affect. The payback period associated with the baghouse is less than one year.

IDEM, OAQ has evaluated the justifications and determined that the baghouse used to recovery product from the Dextrin Flash Dryer (61-9) is an integral part of the milling of wet corn. Therefore, the permitting level will be determined using the potential to emit after these baghouses. The determination that these baghouses are integral to the process was made during the Part 70 review process.

- (d) While under review for a Part 70 permit, the company submitted the following justification that the baghouses that operate in conjunction with units 63-18, 63-12, 61-26, 61-15, and 578-1 be considered as an integral part of the milling of wet corn:

These baghouses collect fugitive powders generated during the dumping of bagged raw materials and return back into the pneumatic conveying system for use. The batch production of starch is based on the bag weights so it is important to the process to capture and use the entire amount. These units generally provide a 99+% collection efficiency and are relatively insensitive to changes in

product loadings and different types of raws; making them the best available equipment for handling fine particulate products.

IDEM, OAQ has evaluated the justifications and determined that the baghouses used for product recovery from dumping are not an integral part of the milling of wet corn. While the baghouses do serve a purpose other than pollution control, the process can operate without them. In addition, no information has been presented to IDEM regarding economic feasibility of operating these baghouses. Therefore, the permitting level will be determined using the potential to emit before these baghouses.

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) OP 097-00042-91-01, issued November 13, 1991;
- (b) CP 097-00042-92-01, issued June 15, 1992;
- (c) CP 097-00042-93-01, issued May 10, 1993 (supersedes CP 097-00042-92-01);
- (d) CP 097-00042-94-01, issued August 29, 1994;
- (e) CP 097-00042-94-02, issued October 26, 1994;
- (f) CP 097-00042-95-01, issued February 15, 1995;
- (g) CP 097-00042-95-02, issued March 8, 1995;
- (h) CP 097-00042-95-03, issued October 6, 1995;
- (i) Agreed Judgement A 49F12-9602-OV-0802, issued September 27, 1996;
- (j) E 097-00042-96-01, issued October 24, 1996;
- (k) E 097-00042-96-02, issued October 25, 1996;
- (l) CP 097-00042-97-01, issued March 24, 1997;
- (m) A 097-00042-98-01, issued April 15, 1998;
- (n) M 097-00042-99-01, issued February 25, 1999;
- (o) CP 097-00042-99-01, issued June 11, 1999;
- (p) SSM 097-11362-00042, issued August 31, 2000;
- (q) MSM 097-11764-00042, issued March 10, 2000.

All terms and conditions from previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised in this Part 70 permit:

- (a) Condition 3 from CP 097-00042-93-01, issued May 10, 1993:
The particulate emissions from unit 5549-4 shall not exceed 0.03 gr/dscf, 1.03 lb/hr, and 4.51 tpy.

Condition 4 from CP 097-00042-95-01, issued February 15, 1995:
The particulate emissions from unit 5549-4 shall not exceed 0.02 gr/dscf.

Revised condition:

Pursuant to CP 097-00042-97-01, issued March 24, 1997, the PM/PM10 emissions from unit 5549-4 shall not exceed 0.01 gr/dscf and 0.64 tpy. Compliance with this limit shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

Reason revised:

The most stringent PM/PM10 limitation (0.01 gr/dscf) on unit 5549-4 (pursuant to CP 097-00042-97-01, issued March 24, 1997) has been incorporated to render the requirements of 326 IAC 2-2 (PSD) not applicable.

- (b) Condition 3 from CP 097-00042-95-03, issued October 6, 1995:
The VOC (methanol) emissions from unit 575-2 shall not exceed 2.08 tons per month and 24.99 tons per rolling 12 consecutive month period in order to render the requirements of 326 IAC 8-1-6 not applicable. In order to comply with this limit, the amount of modified corn starch produced from unit 575-2 shall not exceed 11,995,200 lb or 99.96 batches (assuming 120,000 pounds per batch) per rolling 12 consecutive month period. This limitation is based on an emission rate of 500 lb VOC per 5760 lb reagent and 120,000 lb of modified corn starch processed.

Revised condition:

Pursuant to CP 097-00042-95-03, issued October 6, 1995, the total amount of methanol emitting corn starch produced from unit 575-2 shall not exceed 11,995,200 pounds per twelve consecutive month period with compliance determined at the end of each month and the emission rate shall not exceed 0.0041 lb VOC per lb of starch produced. This limit is equivalent to VOC emissions of less than 25 tons per year. Compliance with this limit will render the requirements of 326 IAC 8-1-6 not applicable.

Reason revised:

The ton per month portion of the limit is not required to render the requirements of 326 IAC 8-1-6 not applicable, restricts operational flexibility, and therefore has been removed at the request of the source. The limit has also been modified to accurately state that the limit only applies to a production of a type of starch which generates VOC emissions. Not all starches produced from unit 575-2 generate VOC emissions.

- (c) Condition 9 from CP 097-00042-95-02, issued March 8, 1995:
The amount of dry product through unit 575-2 shall not exceed 15.4 tons per hour and the operating hours of unit 575-2 shall not exceed 8008 hours per year, or the amount of dry product through unit 575-2 shall not exceed 123,300 tons per twelve consecutive month period. This limit is equivalent to particulate emissions of 32.4 tons per year. Compliance with this limit will satisfy the requirements of 326 IAC 6-1-12.

Revised condition:

The amount of dry product processed by unit 575-2 shall not exceed 123,300 tons per twelve month consecutive period with compliance determined at the end of each month. This limit is equivalent to PM emissions of less than or equal to 32.4 tons per year. Compliance with this limit will satisfy the requirements of 326 IAC 6-1-12.

Reason revised:

In order to provide maximum operational flexibility and streamline permit requirements, the hourly throughput limit and operating hour limit option have been removed.

- (d) Condition 18 from CP 097-00042-97-01, issued March 24, 1997:
Visible emission notations of all stack exhaust to the atmosphere from the respective facilities shall be performed once per day during normal daylight operations.

Condition 13 from CP 097-00042-99-01, issued June 11, 1999:
Visible emission notations of all stack exhaust to the atmosphere from the respective facilities shall be performed once per day during normal daylight operations.

Condition D.1.5 from MSM 097-11764-00042, issued March 10, 2000:
Visible emission notations of all stack exhaust to the atmosphere from unit 577-2 shall be performed once per day during normal daylight operations.

Condition D.1.6 from MSM 097-11764-00042, issued March 10, 2000:
The pressure drop across the baghouse used in conjunction with 577-2 shall be recorded once per day.

Condition D.1.5 from SSM 097-11362-00042, issued August 31, 2000:
Visible emission notations of all stack exhaust to the atmosphere from the spray agglomerator process (stacks 577-2, 5549-16 through 5549-21, 5549-26, and 5549-28) shall be performed once per day during normal daylight operations.

Condition D.1.5 from SSM 097-11362-00042, issued August 31, 2000:
The pressure drop across the baghouses used in conjunction with the spray agglomerator process shall be recorded once per day.

Reason revised:

IDEM, OAQ has concluded that visible emission notations and parametric monitoring on an once per shift basis will better demonstrate continuous compliance with the permit requirements. The OAQ believes that visible emissions and parametric monitoring on an once per shift basis is necessary because baghouse failure can occur suddenly and during any shift. This monitoring can minimize lag time in addressing control failure.

- (e) Condition 12 from CP 097-00042-97-01, issued March 24, 1997:
The particulate emissions from stack 5502-1 (exhausting emissions from 5502-1A, 5502-1B, 5502-1C, and 5502-1D) shall not exceed, in aggregate, 0.01 gr/dscf and 19.8 tpy.

Condition 10 from M 097-00042-99-01, issued February 25, 1999:
The particulate emissions from stack 5502-1 (exhausting emissions from 5502-1A, 5502-1B, 5502-1C, and 5502-1D) shall not exceed 0.02 gr/dscf and 19.44 tons per year. The particulate emissions from stack 5502-7 (also exhausting emissions from 5502-1A, 5502-1B, 5502-1C, and 5502-1D) shall not exceed 0.01 gr/dscf and 0.416 tons per year.

Revised condition:

The PM/PM10 emissions from stack 5502-7 (exhausting emissions from 5502-1A, 5502-1B, 5502-1C, and 5502-1D) shall not exceed 0.0114 gr/dscf and 19.856 tons per year.

Reason revised:

Note that units 5502-1A, 5502-1B, 5502-1C, and 5502-1D used to exhaust to stacks 5502-1 and 5502-7. The allowable particulate emissions from CP 097-00042-97-01, issued March 24, 1997, for 5502-1A, 5502-1B, 5502-1C, and 5502-1D (stack 5502-1) were revised in M 097-00042-99-01, issued February 25, 1999, as part of a Prevention of Significant Deterioration and Emission Offset netting analysis. Upon issuance of M 097-00042-99-01, the CP 097-00042-97-01 limits were no longer applicable.

On September 3, 2002, the source informed IDEM that stack 5502-1 had been removed, and requested that the existing limits on stacks 5502-1 and 5502-7 be adjusted as a result of this change. Stack 5502-1 was previously limited to 0.02 gr/dscf and 19.44 tons per year. Stack 5502-7 was previously limited to 0.01 gr/dscf and 0.416 tons per year. The new PM/PM10 ton per year limit for stack 5502-7 is now 19.856 tons per year; the sum of the two previous limitations. The new grain loading limit on stack 5502-7 is 0.0114 gr/dscf based on stack testing completed in September, 2001. This revision does not result in an increase in potential or allowable emissions so no additional review is necessary.

- (f) A part of Condition 12 from CP 097-00042-97-01, issued March 24, 1997:
The combined input of corn grind to units 5502-1A, 5502-1B, 5502-1C, 5502-1D, 5502-3, 5502-4, 5502-5, 5503-1, 5503-2, 5503-3, 5503-4, and 5503-5 shall not exceed 24,500,000 bushels per twelve consecutive month period with compliance determined at the end of each month. This production limitation is equivalent to total emissions of less than or equal to 37.21 and 32.38 tons of PM and PM10 per year, respectively.

Revised condition:

The combined input of corn grind to units 5502-1A, 5502-1B, 5502-1C, 5502-1D, 5502-3, 5502-4, 5502-5, 5502-6, 5502-7, 5503-1, 5503-2, 5503-3, 5503-4, 5503-5, and 5503-6 shall not exceed 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month. The total emission rate shall not exceed 0.0030 lb PM/PM10 per bushel. This production limitation is equivalent to total emissions of less than or equal to 44.396 tons of PM/PM10 per year.

Reason revised:

The production limit has been revised based on the results from stack tests completed on September 5th and 6th 2001. The revised production limitation does not result in an increase in allowable emissions because the equivalent emissions associated with the limit has not changed. In addition, a short term PM/PM10 emission rate limit has been added to ensure that the production limit is practically enforceable.

- (g) Condition 11 from CP 097-00042-99-01, issued June 11, 1999:
The PM emissions from unit 40-3 shall not exceed 0.016 gr/dscf and 42.3 tons per year. Unit 40-3 shall demonstrate compliance with these limits, and render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable, by the calculation of PM/PM10 emissions (in ton/month) using the following formula:

$$\text{PM/PM10 emissions (ton/month)} = \frac{\text{Production rate (ton/hr)} \times \text{Emission Factor from testing (lb PM/PM10/ton)} \times \text{Hours of operation (hr/month)} \times 1/2000 \text{ (ton/lb)}}{1}$$

Revised condition:

The starch produced from unit 40-3 shall not exceed 145,610 tons per twelve consecutive month period with compliance determined at the end of each month and the emission rate shall not exceed 0.581 lb PM/PM10 per ton of starch. This limitation is equivalent to PM/PM10 emissions of less than 42.3 tons per year. Compliance with this limit will satisfy the requirements of 326 IAC 6-1-12 and render the requirements of 326 IAC 2-2 not applicable.

Reason revised:

As directed by Condition 7 of CP 097-00042-99-01, issued June 11, 1999, the source tested unit 40-3 on September 2, 1999. Taking into account the test results and the maximum capacity of unit 40-3, the PM/PM10 emissions from unit 40-3 could be in violation of 326 IAC 6-1-12, and subject to the requirements of 326 IAC 2-2, if it operated at maximum capacity. Therefore, a production limit has been placed on unit 40-3.

- (h) Condition D.1.1(a) from SSM 097-11362-00042, issued August 31, 2000 as it applies to unit 5549-20:
The PM/PM10 emissions from unit 5549-20 (Line 1 South Packer) shall not exceed 0.01 gr/dscf and 0.24 lb/hr.

Revised condition:

The PM/PM10 emissions from unit 5549-20 (#2 Fugitive Dust Collector) shall not exceed 0.01 gr/dscf, 0.93 lb/hr, and 4.05 tpy.

Reason revised:

The Line 1 South Packer has been changed to #2 Fugitive Dust Collector. The change in service requires an increase in airflow and therefore an increase in emissions. The

increase in emissions associated with this change is 3.0 tons per year of PM/PM10. The net change in emissions (documented in the PSD netting analysis) associated with SSM 097-11362-00042, issued August 31, 2000, was -19.6 and -14.8 tons per year PM and PM10, respectively. The increase in emissions associated with the change of service of unit 5549-20 revises the net emissions associated with SSM 097-11362-00042, issued August 31, 2000, to -16.6 and -13.8 tons per year PM and PM10, respectively. As a result, the net change in emissions remains below the relevant PSD thresholds. This change was documented in a letter to IDEM, OAQ, and OES dated December 3, 2001.

- (i) Condition D.1.1(a) from SSM 097-11362-00042, issued August 31, 2000 as it applies to units 577-5 through 577-10:
The PM/PM10 emissions from units 577-5 through 577-10 shall not exceed 0.01 gr/dscf.

Revised condition:

The PM/PM10 emissions from units 577-5 through 577-10 shall not exceed 0.009 gr/dscf.

Reason revised:

The allowable PM/PM10 emission limits from units 577-5 through 577-10 have been lowered to ensure compliance with the respective ton per year limits for these facilities.

- (j) Condition D.1.1 from SSM 097-11362-00042, issued August 31, 2000:
Units 5549-16 through 5549-21, 5549-26, and 5549-28 shall not exceed the following gr/dscf and lb/hr limitations...

Revised condition:

Units 5549-16 through 5549-21, 5549-26, and 5549-28 shall not exceed the following gr/dscf, lb/hr, and ton/yr limitations...

Reason revised:

The emissions from units 5549-16 through 5549-21, 5549-26, and 5549-28 were limited as part of a 326 IAC 2-2 netting analysis, pursuant to SSM 097-11362-00042, issued August 31, 2000, to render the requirements of 326 IAC 2-2 not applicable. Condition D.1.1 of SSM 097-11362-00042, issued August 31, 2000, did not specify ton per year limits with the gr/dscf and lb/hr limits. The ton per year figures, used in the 326 IAC 2-2 netting analysis, are federally enforceable and have therefore been included with the other limits.

The following terms and conditions from previous approvals have been determined to be no longer applicable; therefore, the following were not incorporated into this Part 70 permit:

- (a) All construction conditions from all previously issued permits.

Reason not incorporated: All previously permitted facilities have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

- (b) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from the boiler ash conveying system (20-1) shall not exceed 0.51 lb/hr, and 1.13 tons per year.

Reason not incorporated:

Unit 20-1 has been removed from the source.

- (c) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from boiler 20-2 shall not exceed 0.32 lb/MMBtu, 18.05 lb/hr, and 47 tons per year. The SO₂ emissions from boiler 20-2 shall not exceed 916.49 tons per year. The NO_x emissions from boiler 20-2 shall not exceed 34.33 lb/hr and 150.37

tpy. The CO emissions from boiler 20-2 shall not exceed 12.26 lb/hr and 53.7 tpy. The VOC emissions from boiler 20-2 shall not exceed 0.17 lb/hr and 0.75 tpy.

Reason not incorporated:
Boiler 20-2 has been removed from the source.

- (d) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from boiler 20-4 shall not exceed 0.32 lb/MMBtu, 18.05 lb/hr, and 47 tons per year. The SO₂ emissions from boiler 20-4 shall not exceed 916.49 tons per year. The NO_x emissions from boiler 20-4 shall not exceed 34.33 lb/hr and 150.37 tpy. The CO emissions from boiler 20-4 shall not exceed 12.26 lb/hr and 53.7 tpy. The VOC emissions from boiler 20-4 shall not exceed 0.17 lb/hr and 0.75 tpy.

Reason not incorporated:
Boiler 20-4 has been removed from the source.

- (e) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from boiler 20-6 shall not exceed 0.32 lb/MMBtu, 36 lb/hr, and 94.1 tons per year. The SO₂ emissions from boiler 20-6 shall not exceed 1828.1 tons per year. The NO_x emissions from boiler 20-6 shall not exceed 68.48 lb/hr and 299.93 tpy. The CO emissions from boiler 20-6 shall not exceed 24.46 lb/hr and 107.12 tpy. The VOC emissions from boiler 20-6 shall not exceed 0.34 lb/hr and 1.5 tpy.

Reason not incorporated:
Boiler 20-6 has been removed from the source.

- (f) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from boiler 20-8 shall not exceed 0.15 lb/MMBtu, 16.43 lb/hr, and 3.4 tons per year. The SO₂ emissions from boiler 20-8 shall not exceed 2.0 lb/MMBtu, 219 lb/hr, and 45.33 tpy. The NO_x emissions from boiler 20-8 shall not exceed 40.15 lb/hr and 70.68 tpy. The CO emissions from boiler 20-8 shall not exceed 4.03 lb/hr and 17.67 tpy. The VOC emissions from boiler 20-8 shall not exceed 0.32 lb/hr and 0.49 tpy.

Reason not incorporated:
Boiler 20-8 has been removed from the source.

- (g) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from boiler 20-10 shall not exceed 0.47 lb/MMBtu, 9.14 lb/hr, and 26.2 tons per year. The SO₂ emissions from boiler 20-10 shall not exceed 3,160.59 tons per year. The NO_x emissions from boiler 20-10 shall not exceed 118.39 lb/hr and 518.55 tpy. The CO emissions from boiler 20-10 shall not exceed 42.28 lb/hr and 185.2 tpy. The VOC emissions from boiler 20-10 shall not exceed 0.59 lb/hr and 2.59 tpy.

Reason not incorporated:
Boiler 20-10 has been removed from the source.

- (h) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 20-11 shall not exceed 0.03 gr/dscf, 0.51 lb/hr, and 2.23 tons per year.

Reason not incorporated:
Unit 20-11 has been removed from the source.

- (i) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 40-2 shall not exceed 10.54 lb/hr and 44.1 tons per year. The SO₂ emissions from unit 40-2 shall not exceed 0.01 lb/MMBtu, 0.36 lb/hr, and 1.58 tons per year. The NO_x emissions from unit 40-2 shall not exceed 1.08 lb/hr and

4.73 tpy. The CO emissions from unit 40-2 shall not exceed 1.33 lb/hr and 5.81 tpy. The VOC emissions from unit 40-2 shall not exceed 0.11 lb/hr and 0.46 tpy.

Reason not incorporated:

The aforementioned particulate, SO₂, VOC, NO_x, and CO emissions limitations from CP 097-00042-91-01, issued November 13, 1991, for unit 40-2 are not required to ensure compliance with any applicable state or federal rule. As a result, the particulate, SO₂, VOC, NO_x, and CO emission limitations for 40-2 from OP 097-00042-91-01, issued November 13, 1991, have not been transferred to this Part 70 permit. Note that the 0.02 gr/dscf emission limitation from CP 097-00042-91-01, issued November 13, 1991 has been included in this Part 70 permit to satisfy the requirements of 326 IAC 6-1-12. See the State Rule Applicability section of this document for other applicable emission limitations.

- (j) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from 40-3 shall not exceed 10.73 lb/hr and 37.3 tons per year.

Reason not incorporated:

The pound per hour and ton per year particulate emission limitations from OP 097-00042-91-01, issued November 13, 1991, for unit 40-3 are not required to ensure compliance with any applicable state or federal rule. As a result, these emission limitations from OP 097-00042-91-01, issued November 13, 1991, have not been transferred to this Part 70 permit. Note that the 0.016 gr/dscf emission limitation from CP 097-00042-99-01, issued June 11, 1999, has been included in this Part 70 permit to satisfy the requirements of 326 IAC 6-1-12. See the State Rule Applicability section of this document for other applicable emission limitations.

- (k) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from 40-4 shall not exceed 7.41 lb/hr and 31.9 tons per year.
The SO₂ emissions from unit 40-4 shall not exceed 0.01 lb/MMBtu, 0.3 lb/hr, and 1.31 tpy.

Reason not incorporated:

The pound per hour particulate and SO₂ emissions limitations from OP 097-00042-91-01, issued November 13, 1991, for unit 40-4 are not required to ensure compliance with any applicable state or federal rule. As a result, these emission limitations from OP 097-00042-91-01, issued November 13, 1991, have not been transferred to this Part 70 permit. Note that the 0.02 gr/dscf emission limitation from OP 097-00042-91-01, issued November 13, 1991, has been included in this Part 70 permit to satisfy the requirements of 326 IAC 6-1-12. See the State Rule Applicability section of this document for other applicable emission limitations.

- (l) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 42-4 shall not exceed 1.04 lb/hr and 4.6 tpy.

Reason not incorporated:

The pound per hour and ton per year particulate emissions limitations from OP 097-00042-91-01, issued November 13, 1991, for unit 42-4 are not required to ensure compliance with any applicable state or federal rule. As a result, these emission limitations from OP 097-00042-91-01, have not been transferred to this Part 70 permit. Note that the 0.029 gr/dscf emission limitation from OP 097-00042-91-01, issued November 13, 1991, has been included in this Part 70 permit to satisfy the requirements of 326 IAC 6-1-12. See the State Rule Applicability section of this document for other applicable emission limitations and non-applicability determinations pertaining to this unit.

- (m) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 42-5 shall not exceed 0.03 gr/dscf, 0.19 lb/hr, and 0.84 tpy.

Reason not incorporated:
Unit 42-5 has been removed from the source.

- (n) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 42-10 shall not exceed 1.29 lb/hr and 3.70 tpy.

Reason not incorporated:
The pound per hour and ton per year particulate emissions limitations from OP 097-00042-91-01, issued November 13, 1991, for unit 42-10 are not required to ensure compliance with any applicable state or federal rule. As a result, these emission limitations from OP 097-00042-91-01, have not been transferred to this Part 70 permit. Note that the 0.03 gr/dscf emission limitation from OP 097-00042-91-01, issued November 13, 1991, has been included in this Part 70 permit to satisfy the requirements of 326 IAC 6-1-12. See the State Rule Applicability section of this document for other applicable emission limitations and non-applicability determinations pertaining to this unit.

- (o) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 51-3 shall not exceed 0.03 gr/dscf, 0.62 lb/hr, and 2.7 tpy.

Reason not incorporated:
Unit 51-3 has been removed from the source.

- (p) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 51-5 shall not exceed 0.03 gr/dscf, 1.85 lb/hr, and 8.11 tpy.

Reason not incorporated:
Unit 51-5 has been removed from the source.

- (q) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 54-1 shall not exceed 1.5 lb/hr and 4.2 tpy.

Reason not incorporated:
The pound per hour and ton per year particulate emissions limitations from OP 097-00042-91-01, issued November 13, 1991, for unit 54.1 are not required to ensure compliance with any applicable state or federal rule. As a result, these emission limitations from OP 097-00042-91-01, have not been transferred to this Part 70 permit. See the State Rule Applicability section of this document for the applicable emission limitations and non-applicability determinations pertaining to this unit.

- (r) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 56-3 shall not exceed 0.03 gr/dscf, 5.14 lb/hr, and 5.8 tpy.

Reason not incorporated:
Unit 56-3 has been removed from the source.

- (s) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 56-4 shall not exceed 0.03 gr/dscf, 0.82 lb/hr, and 1.1 tpy.

Reason not incorporated:
Unit 56-4 has been removed from the source.

- (t) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 61-3 shall not exceed 1.14 lb/hr and 1.05 tpy.

Reason not incorporated:

The pound per hour and ton per year particulate emissions limitations from OP 097-00042-91-01, issued November 13, 1991, for unit 61-3 are not required to ensure compliance with any applicable state or federal rule. As a result, these emission limitations from OP 097-00042-91-01, have not been transferred to this Part 70 permit. Note that the 0.03 gr/dscf emission limitation from OP 097-00042-91-01, issued November 13, 1991, has been included in this Part 70 permit to satisfy the requirements of 326 IAC 6-1-2. See the State Rule Applicability section of this document for other applicable emission limitations and non-applicability determinations pertaining to this unit.

- (u) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 61-9 shall not exceed 1.03 lb/hr.

Reason not incorporated:

The pound per hour particulate emission limitation from OP 097-00042-91-01, issued November 13, 1991, for unit 61-9 is not required to ensure compliance with any applicable state or federal rule. As a result, these emission limitations from OP 097-00042-91-01, have not been transferred to this Part 70 permit. Note that the 0.016 gr/dscf emission limitation from OP 097-00042-91-01, issued November 13, 1991, has been included in this Part 70 permit to satisfy the requirements of 326 IAC 6-1-12. See the State Rule Applicability section of this document for other applicable emission limitations and non-applicability determinations pertaining to this unit.

- (v) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 61-15 shall not exceed 1.29 lb/hr, and 0.91 tpy.

Reason not incorporated:

The pound per hour and ton per year particulate emissions limitations from OP 097-00042-91-01, issued November 13, 1991, are not required to ensure compliance with any applicable state or federal rule. As a result, these emission limitations from OP 097-00042-91-01, have not been transferred to this Part 70 permit. Note that the 0.03 gr/dscf emission limitation from OP 097-00042-91-01, issued November 13, 1991, has been included in this Part 70 permit to satisfy the requirements of 326 IAC 6-1-2. See the State Rule Applicability section of this document for other applicable emission limitations and non-applicability determinations pertaining to this unit.

- (w) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from units 61-22 and 61-23 shall not exceed 1.14 lb/hr and 1.45 tpy each.

Reason not incorporated:

The pound per hour and ton per year particulate emissions limitations from OP 097-00042-91-01, issued November 13, 1991, for units 61-22 and 61-23 are not required to ensure compliance with any applicable state or federal rule. As a result, these emission limitations from OP 097-00042-91-01, have not been transferred to this Part 70 permit. Note that the 0.03 gr/dscf emission limitation from OP 097-00042-91-01, issued November 13, 1991, has been included in this Part 70 permit to satisfy the requirements of 326 IAC 6-1-2. See the State Rule Applicability section of this document for other applicable emission limitations and non-applicability determinations pertaining to this unit.

- (x) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 62-2 shall not exceed 0.03 gr/dscf, 10.93 lb/hr, and 23.28 tpy.

Reason not incorporated:

Unit 62-2 has been removed from the source.

- (y) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:

The particulate emissions from unit 63-7 shall not exceed 0.03 gr/dscf, 0.15 lb/hr, and 0.36 tpy.

Reason not incorporated:
Unit 63-7 has been removed from the source.

- (z) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 63-11 shall not exceed 0.03 gr/dscf, 0.11 lb/hr, and 0.02 tpy.

Reason not incorporated:
Unit 63-11 has been removed from the source.

- (aa) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 63-14 shall not exceed 0.03 gr/dscf, 0.15 lb/hr, and 0.23 tpy.

Reason not incorporated:
Unit 63-14 has been removed from the source.

- (bb) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 63-19 shall not exceed 0.16 lb/hr, and 0.58 tpy.

Reason not incorporated:
Unit 63-19 has been removed from the source.

- (cc) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 64-1 shall not exceed 0.03 gr/dscf, 2.83 lb/hr, and 6.93 tpy.

Reason not incorporated:
Unit 64-1 has been removed from the source.

- (dd) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 64-2 shall not exceed 0.03 gr/dscf, 0.04 lb/hr, and 0.01 tpy.

Reason not incorporated:
Unit 64-2 has been removed from the source.

- (ee) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 64-3 shall not exceed 0.03 gr/dscf, 0.51 lb/hr, and 0.64 tpy.

Reason not incorporated:
Unit 64-3 has been removed from the source.

- (ff) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 64-4 shall not exceed 0.5 lb/hr, and 0.42 tpy.

Reason not incorporated:
Unit 64-4 has been removed from the source.

- (gg) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 64-5 shall not exceed 0.03 gr/dscf, 0.04 lb/hr, and 0.01 tpy.

Reason not incorporated:

Unit 64-5 has been removed from the source.

- (hh) Condition 3(a) and 3(f) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions (from the process) from unit 67-1A shall not exceed 0.03 gr/dscf and 51.6 tpy. The particulate emissions (from combustion) from unit 67-1A shall not exceed 0.15 lb/MMBtu and 7.39 tpy. The SO₂ emissions from unit 67-1A shall not exceed 2.0 lb/MMBtu and 98.58 tpy. The NO_x emissions from unit 67-1A shall not exceed 23.64 lb/hr and 43.33 tpy. The CO emissions from unit 67-1A shall not exceed 2.47 lb/hr and 10.83 tpy. The VOC emissions from unit 67-1A shall not exceed 0.2 lb/hr and 0.87 tpy. The fuel oil fed to from unit 67-1A is limited such that the unit shall operate no more than 1550 full load hours per year.

Reason not incorporated:
Unit 67-1A has been removed from the source.

- (ii) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 67-7 shall not exceed 0.015 gr/dscf, 13.5 lb/hr, and 25.2 tpy.

Reason not incorporated:
Unit 67-7 has been removed from the source.

- (jj) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The total particulate emissions from unit 67-12A and 67-12B shall not exceed 0.03 gr/dscf, 1.03 lb/hr, and 4.4 tpy.

Reason not incorporated:
Units 67-12A and 67-12B have been removed from the source.

- (kk) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 67-13 shall not exceed 0.03 gr/dscf, 1.2 lb/hr, and 5.2 tpy.

Reason not incorporated:
Unit 67-13 has been removed from the source.

- (ll) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 67-14 shall not exceed 0.03 gr/dscf, 0.55 lb/hr, and 1.98 tpy.

Reason not incorporated:
Unit 67-14 has been removed from the source.

- (mm) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 67-17 shall not exceed 0.02 gr/dscf, 3.5 lb/hr, and 12.6 tpy. Visible emissions shall not exceed 20% opacity.

Reason not incorporated:
Unit 67-17 has been removed from the source.

- (nn) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 67-17A shall not exceed 0.02 gr/dscf, 3.5 lb/hr, and 12.6 tpy. Visible emissions shall not exceed 20% opacity.

Reason not incorporated:
Unit 67-17A has been removed from the source.

- (oo) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:

The particulate emissions (from the process) from unit 67-19 shall not exceed 0.03 gr/dscf and 26.3 tpy. The particulate emissions (from combustion) from unit 67-19 shall not exceed 0.15 lb/MMBtu and 7.29 tpy. The SO₂ emissions from unit 67-19 shall not exceed 2.0 lb/MMBtu and 97.2 tpy. The NO_x emissions from unit 67-19 shall not exceed 8.03 lb/hr and 3.68 tpy. The VOC emissions from unit 67-19 shall not exceed 0.07 lb/hr and 0.29 tpy. The CO emissions from unit 67-19 shall not exceed 0.84 lb/hr and 3.68 tpy. The fuel oil fed to from unit 67-19 is limited such that the unit shall operate no more than 4500 full load hours per year.

Reason not incorporated:
Unit 67-19 has been removed from the source.

- (pp) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 69-6 shall not exceed 2.1 lb/hr, and 7.56 tpy.

Reason not incorporated:
Unit 69-6 has been removed from the source.

- (qq) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from units 71-4B, 71-4C, and 71-4D shall not exceed 0.026 gr/dscf, and 0.3 tpy each pursuant to 326 IAC 6-1-12.

Reason not incorporated:
Units 71-4B, 71-4C, and 71-4D have been removed from the source.

- (rr) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 575-1 shall not exceed 12.58 lb/hr. The SO₂ emissions from unit 575-1 shall not exceed 0.01 lb/MMBtu, 0.43 lb/hr, and 1.88 tpy. The NO_x emissions from unit 575-1 shall not exceed 1.29 lb/hr and 5.65 tpy. The VOC emissions from unit 575-1 shall not exceed 0.13 lb/hr and 0.59 tpy. The CO emissions from unit 575-1 shall not exceed 1.67 lb/hr and 7.32 tpy.

Reason not incorporated:
The particulate, SO₂, VOC, NO_x, and CO emissions limitations from CP 097-00042-91-01, issued November 13, 1991, for unit 575-1 are not required to ensure compliance with any applicable state or federal rule. As a result, the particulate, SO₂, VOC, NO_x, and CO emission limitations for 575-1 from OP 097-00042-91-01, issued November 13, 1991, have not been transferred to this Part 70 permit. Note that the 0.018 gr/dscf and 32.4 tpy emission limitations from CP 097-00042-91-01, issued November 13, 1991 have been included in this Part 70 permit to satisfy the requirements of 326 IAC 6-1-12. See the State Rule Applicability section of this document for other applicable emission limitations and non-applicability determinations pertaining to this unit.

- (ss) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from stack 69-3 (exhausting emissions from 69-3A, 69-3B, and 69-3C) shall not exceed 0.026 gr/dscf, 1.23 lb/hr, and 3.7 tpy.

Reason not incorporated:
Units 69-3A, 69-3B, and 69-3C have been removed from the source.

- (tt) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 71-7 shall not exceed 2.83 lb/h, and 1.27 tpy.

Reason not incorporated:
The pound per hour and ton per year particulate emissions limitations from OP 097-00042-91-01, issued November 13, 1991, for unit 71-7 are not required to ensure compliance with any applicable state or federal rule. As a result, these emission limitations from OP 097-00042-91-01, have not been transferred to this Part 70 permit.

Note that the 0.03 gr/dscf emission limitation from OP 097-00042-91-01, issued November 13, 1991, has been included in this Part 70 permit to satisfy the requirements of 326 IAC 6-1-2.

- (uu) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from 577-2 shall not exceed 0.03 gr/dscf, 0.98 lb/hr, and 4.29 tons per year.

Reason not incorporated:

The particulate emissions from 577-2 were revised in SSM 097-11362-00042, issued August 31, 2000, as part of a Prevention of Significant Deterioration and Emission Offset netting analysis. As stated in this permit, the particulate emissions from 577-2 are limited to 0.01 gr/dscf and 5.65 tpy to render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable. See the State Rule Applicability section of this document for other applicable emission limitations and non-applicability determinations pertaining to this unit.

- (vv) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 577-3 shall not exceed 2.57 lb/hr and 5.01 tpy.

Reason not incorporated:

The pound per hour and ton per year particulate emissions limitations from OP 097-00042-91-01, issued November 13, 1991, for unit 577-3 are not required to ensure compliance with any applicable state or federal rule. As a result, these emission limitations from OP 097-00042-91-01, have not been transferred to this Part 70 permit. Note that the 0.03 gr/dscf emission limitation from OP 097-00042-91-01, issued November 13, 1991, has been included in this Part 70 permit to satisfy the requirements of 326 IAC 6-1-2. See the State Rule Applicability section of this document for other applicable emission limitations and non-applicability determinations pertaining to this unit.

- (ww) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 578-1 shall not exceed 1.03 lb/hr and 4.51 tpy.

Reason not incorporated:

The pound per hour and ton per year particulate emissions limitations from OP 097-00042-91-01, issued November 13, 1991, for unit 578-1 are not required to ensure compliance with any applicable state or federal rule. As a result, these emission limitations from OP 097-00042-91-01, have not been transferred to this Part 70 permit. Note that the 0.03 gr/dscf emission limitation from OP 097-00042-91-01, issued November 13, 1991, has been included in this Part 70 permit to satisfy the requirements of 326 IAC 6-1-2. See the State Rule Applicability section of this document for other applicable emission limitations and non-applicability determinations pertaining to this unit.

- (xx) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 578-3 shall not exceed 1.54 lb/hr and 3.7 tpy.

Reason not incorporated:

The pound per hour and ton per year particulate emissions limitations from OP 097-00042-91-01, issued November 13, 1991, for unit 578-3 are not required to ensure compliance with any applicable state or federal rule. As a result, these emission limitations from OP 097-00042-91-01, have not been transferred to this Part 70 permit. Note that the 0.03 gr/dscf emission limitation from OP 097-00042-91-01, issued November 13, 1991, has been included in this Part 70 permit to satisfy the requirements of 326 IAC 6-1-2. See the State Rule Applicability section of this document for other applicable emission limitations and non-applicability determinations pertaining to this unit.

- (yy) Condition 3(a) from OP 097-00042-91-01, issued November 13, 1991:
The particulate emissions from unit 581-2 shall not exceed 2.96 lb/hr and 3.11 tpy.

Reason not incorporated:

The pound per hour and ton per year particulate emissions limitations from OP 097-00042-91-01, issued November 13, 1991, for unit 581-2 are not required to ensure compliance with any applicable state or federal rule. As a result, these emission limitations from OP 097-00042-91-01, have not been transferred to this Part 70 permit. Note that the 0.03 gr/dscf emission limitation from OP 097-00042-91-01, issued November 13, 1991, has been included in this Part 70 permit to satisfy the requirements of 326 IAC 6-1-2. See the State Rule Applicability section of this document for other applicable emission limitations and non-applicability determinations pertaining to this unit.

- (zz) Condition 3 from CP 097-00042-93-01, issued May 10, 1993:
The particulate emissions from unit 575-3 shall not exceed 0.02 gr/dscf, 13.71 lb/hr, and 60.07 tpy.

Reason not incorporated:

The particulate emissions from 575-3 were revised in CP 097-00042-97-01, issued March 24, 1997, as part of a Prevention of Significant Deterioration and Emission Offset netting analysis. As stated in this permit, the particulate emissions from 575-3 are limited to 0.012 gr/dscf and 30.82 tpy; see State Rule Applicability - 326 IAC 2-2 of this document for more information.

- (aaa) Condition 3 from CP 097-00042-93-01, issued May 10, 1993:
The SO₂ emissions from unit 575-3 shall not exceed 0.01 lb/MMBtu/hr, 0.4 lb/hr and 1.75 tpy. The NO_x emissions from unit 575-3 shall not exceed 5.9 lb/hr and 25.84 tpy. The VOC emissions from unit 575-3 shall not exceed 0.121 lb/hr and 0.52 tpy. The CO emissions from unit 575-3 shall not exceed 1.47 lb/hr and 6.44 tpy.

Reason not incorporated:

The SO₂, VOC, and CO emissions limitations from CP 097-00042-93-01 are not required to ensure compliance with any applicable state or federal rule. The limited NO_x emissions (25.84 tpy) from unit 575-3 were used in the Emission Offset netting analysis completed with CP 097-00042-93-01, issued May 10, 1993. However, the unrestricted NO_x PTE of unit 575-3 is equal to 17.2 tpy; less than the allowable emissions per CP 097-00042-93-01. As a result, the SO₂, VOC, NO_x, and CO emission limitations for 575-3 from CP 097-00042-93-01, issued May 10, 1993, have not been included in this Part 70 permit. See the State Rule Applicability section of this document for the applicable emission limitations and non-applicability determinations pertaining to this unit.

- (bbb) Condition 3 from CP 097-00042-93-01, issued May 10, 1993:
The particulate emissions from units 577-5 through 577-10 shall not exceed 0.03 gr/dscf, 1.16 lb/hr, and 5.07 tpy each.

Reason not incorporated:

The allowable particulate emissions from units 577-5 through 577-10 were revised in CP 097-00042-97-01, issued March 24, 1997 as part of a Prevention of Significant Deterioration and Emission Offset netting analysis. As stated in this permit, the particulate emissions from units 577-5 through 577-10 are limited to 0.009 gr/dscf and 1.52 tpy each to render the requirements of 326 IAC 2-2 not applicable; see State Rule Applicability - 326 IAC 2-2 of this document for more information.

- (ccc) Condition 3 from CP 097-00042-93-01, issued May 10, 1993:
The particulate emissions from 5549-1 and 5549-2 shall not exceed 0.03 gr/dscf, 5.45 lb/hr, and 23.87 tons per year each.

Reason not incorporated:

The allowable particulate emissions from 5549-1 and 5549-2 were revised in CP 097-00042-97-01, issued March 24, 1997, as part of a Prevention of Significant Deterioration and Emission Offset netting analysis. As stated in this permit, the particulate emissions

from 5549-1 and 5549-2 are limited to 0.02 gr/dscf and 17.57 tpy each; see State Rule Applicability - 326 IAC 2-2 of this document for more information.

- (ddd) Condition 3 from CP 097-00042-93-01, issued May 10, 1993:
The SO₂ emissions from unit 5549-1 and 5549-2 shall not exceed 0.01 lb/MMBtu/hr, 0.25 lb/hr and 1.1 tpy each. The NO_x emissions from unit 5549-1 and 5549-2 shall not exceed 3.7 lb/hr and 16.21 tpy each. The VOC emissions from unit 5549-1 and 5549-2 shall not exceed 0.07 lb/hr and 0.31 tpy each. The CO emissions from unit 5549-1 and 5549-2 shall not exceed 0.92 lb/hr and 4.03 tpy each.

Reason not incorporated:

The SO₂, VOC, and CO emissions limitations from CP 097-00042-93-01 are not required to ensure compliance with any applicable state or federal rule. The total limited NO_x emissions (32.42 tpy) from units 5549-1 and 5549-2 were used in the Emission Offset netting analysis completed with CP 097-00042-93-01, issued May 10, 1993. However, the total unrestricted NO_x PTE of units 5549-1 and 5549-2 is equal to 21.5 tpy; less than the allowable emissions per CP 097-00042-93-01. As a result, the SO₂, VOC, NO_x, and CO emission limitations for unit 5549-1 and 5549-2 from CP 097-00042-93-01, issued May 10, 1993, have not been included in this Part 70 permit. See the State Rule Applicability section of this document for the applicable emission limitations and non-applicability determinations pertaining to this unit.

- (eee) Part of Condition 14 from CP 097-00042-97-01, issued March 24, 1997:
The combined input of corn grind to units 40-3, 40-4, 575-2, 575-3, 577-5, 577-6, 577-7, 577-8, 577-9, and 577-10 shall not exceed 24,500,000 bushels per twelve consecutive month period with compliance determined at the end of each month. The total emission rate shall not exceed 0.0037 lb PM per bushel and 0.0032 lb PM10 per bushel. This production limitation is equivalent to total emissions of less than 45.68 and 39.51 tons of PM and PM10 per year, respectively.

Reason not incorporated:

This input limit is superfluous. A 29,584,000 bushel per year corn grind input limit (included as Condition D.1.1(a)(1) of this permit) restricts the amount of corn processed by the entire source. In addition, the sum of the individual PM/PM10 emission limits (see Conditions D.1.1 and D.2.1 of this permit) for all of the units associated with the 24,500,000 bushel limit is less than the emissions (45.68 and 39.51 tpy PM and PM10, respectively) associated with the 24,500,000 bushel limit. As a result, the removal of this limit does not change the allowable emissions from this source.

- (fff) Condition 3 from CP 097-00042-93-01, issued May 10, 1993;
The particulate emissions from unit 5549-5 shall not exceed 0.03 gr/dscf, 0.44 lb/hr, and 1.91 tpy.

Reason not incorporated:

Unit 5549-5 has been removed from the source.

- (ggg) Condition 3 from CP 097-00042-93-01, issued May 10, 1993;
The particulate emissions from unit 5549-6 shall not exceed 0.03 gr/dscf, 1.03 lb/hr, and 4.51 tpy.

Reason not incorporated:

Unit 5549-6 has been removed from the source.

- (hhh) Condition 3 from CP 097-00042-93-01, issued May 10, 1993:
The particulate emissions from 5549-3 shall not exceed 0.03 gr/dscf, 0.44 lb/hr, and 1.91 tpy.

Reason not incorporated:

The allowable particulate emissions from 5549-3 were revised in CP 097-00042-97-01, issued March 24, 1997, as part of a Prevention of Significant Deterioration and Emission Offset netting analysis. As stated in this permit, the particulate emissions from 5549-3 are limited to 0.01 gr/dscf and 0.64 tpy to render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable; see State Rule Applicability - 326 IAC 2-2 of this document for more information.

- (iii) Condition 3 from CP 097-00042-93-01, issued May 10, 1993:
The particulate emissions from 5549-7 through 5549-10 shall not exceed 0.03 gr/dscf, 0.12 lb/hr, and 0.51 tpy each.

Reason not incorporated:

The allowable particulate emissions from 5549-7 through 5549-10 were revised in CP 097-00042-97-01, issued March 24, 1997, as part of a Prevention of Significant Deterioration and Emission Offset netting analysis. As stated in this permit, the particulate emissions from 5549-7 through 5549-10 are limited to 0.01 gr/dscf and 0.17 tpy each to render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable; see State Rule Applicability - 326 IAC 2-2 of this document for more information.

- (jjj) Condition 3 from CP 097-00042-93-01, issued May 10, 1993:
The particulate emissions from 5549-11 shall not exceed 0.03 gr/dscf and 0.51 tpy.

Part of Condition 14, as it pertains to 5549-11, from CP 097-00042-97-01, issued March 24 1997:

The particulate emissions from 5549-11 shall not exceed 0.01 gr/dscf and 0.38 tpy.

Reason not incorporated:

Unit 5549-11 has been removed from the source.

- (kkk) Condition 3 from CP 097-00042-93-01, issued May 10, 1993:
The particulate emissions from 5549-12 shall not exceed 0.02 gr/dscf and 1.15 tpy.

Reason not incorporated:

The allowable particulate emissions from 5549-12 were revised in CP 097-00042-97-01, issued March 24, 1997, as part of a Prevention of Significant Deterioration and Emission Offset netting analysis. As stated in this permit, the particulate emissions from 5549-12 are limited to 0.01 gr/dscf and 0.57 tpy; see State Rule Applicability - 326 IAC 2-2 of this document for more information.

- (lll) Condition 3 from CP 097-00042-93-01, issued May 10, 1993:
The particulate emissions from 5549-13 shall not exceed 0.02 gr/dscf and 9.39 tpy.

Reason not incorporated:

The allowable particulate emissions from 5549-13 were revised in CP 097-00042-97-01, issued March 24, 1997, as part of a Prevention of Significant Deterioration and Emission Offset netting analysis. As stated in this permit, the particulate emissions from 5549-13 are limited to 0.01 gr/dscf and 4.29 tpy; see State Rule Applicability - 326 IAC 2-2 of this document for more information.

- (mmm) Condition 3 from CP 097-00042-93-01, issued May 10, 1993:
The particulate emissions from 5549-14 shall not exceed 0.02 gr/dscf and 2.13 tpy.

Reason not incorporated:

The allowable particulate emissions from 5549-14 were revised in CP 097-00042-97-01, issued March 24, 1997, as part of a Prevention of Significant Deterioration and Emission Offset netting analysis. As stated in this permit, the particulate emissions from 5549-14 are limited to 0.01 gr/dscf and 1.07 tpy; see State Rule Applicability - 326 IAC 2-2 of this document for more information.

- (nnn) Condition 3 from CP 097-00042-94-01, issued August 29, 1994:
The particulate emissions from unit 40-3 shall not exceed 0.25 lb/hr and 1.07 tpy. The SO₂ emissions from unit 40-3 shall not exceed 0.36 lb/hr and 1.58 tpy. The NO_x emissions from unit 40-3 shall not exceed 3.79 lb/hr and 16.6 tpy. The VOC emissions from unit 40-3 shall not exceed 0.11 lb/hr and 0.49 tpy. The CO emissions from unit 40-3 shall not exceed 1.38 lb/hr and 6.06 tpy.

Reason not incorporated:

The particulate, SO₂, VOC, NO_x, and CO emissions limitations from CP 097-00042-94-01, issued August 24, 1994, are not required to ensure compliance with any applicable state or federal rule. As a result, the particulate, SO₂, VOC, NO_x, and CO emission limitations for 40-3 from CP 097-00042-94-01, issued August 29, 1994, have not been transferred to this Part 70 permit. See the State Rule Applicability section of this document for the applicable emission limitations and non-applicability determinations pertaining to this unit.

- (ooo) Condition 3 from CP 097-00042-94-01, issued August 29, 1994:
The particulate emissions from unit 40-4 shall not exceed 0.01 gr/dscf, 0.37 lb/hr and 1.64 tpy. The SO₂ emissions from unit 40-4 shall not exceed 0.01 lb/MMBtu, 0.3 lb/hr and 1.31 tpy. The NO_x emissions from unit 40-4 shall not exceed 3.16 lb/hr and 13.84 tpy. The VOC emissions from unit 40-4 shall not exceed 0.09 lb/hr and 0.4 tpy. The CO emissions from unit 40-4 shall not exceed 1.15 lb/hr and 5.05 tpy.

Reason not incorporated:

The particulate, SO₂, VOC, NO_x, and CO emissions limitations from CP 097-00042-94-01 are not required to ensure compliance with any applicable state or federal rule. As a result, the particulate, SO₂, VOC, NO_x, and CO emission limitations for 40-4 from CP 097-00042-94-01, issued August 29, 1994, have not been transferred to this Part 70 permit. See the State Rule Applicability section of this document for the applicable emission limitations and non-applicability determinations pertaining to this unit.

- (ppp) Condition 3 from CP 097-00042-95-02, issued March 8, 1995:
The SO₂ emissions from 575-2 shall not exceed 0.01 lb/MMBtu and 0.1 tons per year.

Reason not incorporated:

The SO₂ emissions from 575-2 are not required to ensure compliance with any applicable state or federal rule. As a result, the SO₂ emission limitations for 575-2 from CP 097-00042-95-02, issued March 8, 1995, have not been transferred to this Part 70 permit. See the State Rule Applicability section of this document for the applicable emission limitations and non-applicability determinations pertaining to this unit.

- (qqq) Condition 12 from CP 097-00042-97-01, issued March 24, 1997:
The allowable particulate emissions from 5502-3 shall not exceed 2.84 tpy.

Reason not incorporated:

The allowable particulate emissions from 5502-3 were revised in M 097-00042-99-01, issued February 25, 1999, and included in a Prevention of Significant Deterioration and Emission Offset netting analysis. As stated in this permit, the particulate emissions from 5502-3 are limited to 0.01 gr/dscf and 4.212 tpy; see State Rule Applicability - 326 IAC 2-2 of this document for more information.

- (rrr) Condition 12 from CP 097-00042-97-01, issued March 24, 1997:
The allowable particulate emissions from 5502-4 shall not exceed 0.7 tpy.

Reason not incorporated:

The allowable particulate emissions from 5502-4 were revised in M 097-00042-99-01, issued February 25, 1999, and included in a Prevention of Significant Deterioration and Emission Offset netting analysis. As stated in this permit, the particulate emissions from

5502-4 are limited to 0.01 gr/dscf and 0.068 tpy; see State Rule Applicability - 326 IAC 2-2 of this document for more information.

- (sss) Condition 12 from CP 097-00042-97-01, issued March 24, 1997:
The allowable particulate emissions from 5502-5 shall not exceed 4.37 tpy.

Reason not incorporated:

The allowable particulate emissions from 5502-5 were revised in M 097-00042-99-01, issued February 25, 1999, and included in a Prevention of Significant Deterioration and Emission Offset netting analysis. As stated in this permit, the particulate emissions from 5502-5 are limited to 0.01 gr/dscf and 4.964 tpy; see State Rule Applicability - 326 IAC 2-2 of this document for more information.

- (ttt) Condition 14, as it pertains to 40-3, 40-4, and 575-2, from CP 097-00042-97-01, issued March 24, 1997:
The PM/PM10 emissions from the combustion sources on units 40-3, 40-4, and 575-2 shall not exceed 1.99, 1.66, and 2.1 tons per year respectively.

Reason not incorporated:

The combustion and process emissions from each unit (40-3, 40-4, and 575-2) exhaust to the same stacks. Units 40-3, 40-4, and 575-2 are, and have been, subject to the requirements of 326 IAC 6-1-12 and comply with that rule with the use of wet scrubbers. The source has not requested to revise the 326 IAC 6-1-12 limitations (in gr/dscf and tpy) which were in place prior to the issuance of CP 097-00042-97-01. Therefore, compliance with 326 IAC 6-1-12 will ensure compliance with the aforementioned limits from CP 097-00042-97-01.

- (uuu) Condition D.1.1(b) from SSM 097-11362-00042, issued August 31, 2000:
National Starch and Chemical Company requires the use of netting credits to avoid PSD review for PM and PM10. Contemporaneous creditable emission decreases are obtained from the shut down of the following units. The following units shall be permanently placed out of service: 62-1A, 67-7, 67-12, 67-13, 67-14, 67-17, 67-17A, 67-19, 69-3, 62-1C, 62-1D, 62-2, 63-3, 63-10, 64-1, 64-2, 64-3, 64-4, and 64-5.

Reason not incorporated:

All of these units have been shut down and removed from the source. Therefore, these units are not included in this Part 70 permit and therefore can not be operated without prior approval from IDEM, OAQ.

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 13, 1996.

There was no notice of completeness letter mailed to the source.

Emission Calculations

The source did not provide any emission calculations with the permit application. IDEM, OAQ did not complete any calculations because they are not necessary to determine the applicability of a state or federal rule.

Unrestricted 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 and limits. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. This information is based on the information provided in previous permits and approvals.

Pollutant	Potential To Emit (tons/year)
PM	greater than 250
PM-10	greater than 250
SO ₂	less than 100
VOC	less than 100
CO	greater than 100 but less than 250
NO _x	greater than 100 but less than 250

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

HAP's	Potential To Emit (tons/year)
Propylene Oxide	less than 10
Methanol	greater than 25
all other HAPs	less than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM₁₀, CO, and NO_x, are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (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 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2000 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	not reported
PM-10	123.24
SO ₂	22.7

VOC	2.38
CO	31.94
NO _x	74.59
HAP	not reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
40-4	44.1 ^(a)	44.1 ^(a)	0.1	0.7	11.0	13.1	Negl.
40-3	42.3 ^{(a)(k)}	42.3 ^{(a)(k)}	0.1	0.9	13.2	15.8	Negl.
40-2	31.9 ^(a)	31.9 ^(a)	0.1	0.9	13.2	15.8	Negl.
575-1	32.4 ^(a)	32.4 ^(a)	0.1	1.0	15.8	18.8	Negl.
575-3	30.82 ^(d)	24.65 ^(d)	0.1	1.0	14.4	17.2	Negl.
5549-1	17.57 ^(d)	14.06 ^(d)	0.1	0.6	9.0	10.7	Negl.
5549-2	17.57 ^(d)	14.06 ^(d)	0.1	0.6	9.0	10.7	Negl.
575-2	32.4 ^(a)	32.4 ^(a)	0.1	<25 ^(g)	13.7	16.3	24.99
5502-1A/B/C/D	19.86 ^(j)	19.86 ^(j)	35.3 ^(h)	2.8	42.2	39 ⁽ⁱ⁾	Negl.
71-7	(b)	(b)	0	0	0	0	0
577-2	5.65 ^(c)	5.65 ^(c)	0	0	0	0	0
42-10	2.4 ^(a)	2.4	0	0	0	0	0
54-1	(b)	(b)	0	0	0	0	0
577-5	1.52 ^(d)	1.52 ^(d)	0	0	0	0	0
577-6	1.52 ^(d)	1.52 ^(d)	0	0	0	0	0
577-7	1.52 ^(d)	1.52 ^(d)	0	0	0	0	0
577-8	1.52 ^(d)	1.52 ^(d)	0	0	0	0	0
577-9	1.52 ^(d)	1.52 ^(d)	0	0	0	0	0
577-10	1.52 ^(d)	1.52 ^(d)	0	0	0	0	0
5549-3	0.64 ^(d)	0.64 ^(d)	0	0	0	0	0
5549-4	0.64 ^(d)	0.64 ^(d)	0	0	0	0	0
5549-7	0.17 ^(d)	0.17 ^(d)	0	0	0	0	0
5549-8	0.17 ^(d)	0.17 ^(d)	0	0	0	0	0
5549-9	0.17 ^(d)	0.17 ^(d)	0	0	0	0	0
5549-10	0.17 ^(d)	0.17 ^(d)	0	0	0	0	0
71-1	0.9 ^(a)	0.9	0	0	0	0	0
5549-12	0.57 ^(d)	0.57 ^(d)	0	0	0	0	0

Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
5549-13	4.29 ^(d)	4.29 ^(d)	0	0	0	0	0
5549-14	1.07 ^(d)	1.07 ^(d)	0	0	0	0	0
5502-3	4.21 ^(d)	4.21 ^(d)	0	0	0	0	0
5502-4	0.068 ^(d)	0.068 ^(d)	0	0	0	0	0
5502-5 (stack 5502-5)	4.96 ^(d)	4.96 ^(d)	0	0	0	0	0
5502-5 (stack 5502-6)	4.35 ^(d)	4.35 ^(d)	0	0	0	0	0
5503-1	6.69 ^(d)	6.69 ^(d)	0	0	0	0	0
5503-2 through 5503-5	3.11 ^(d)	3.11 ^(d)	0	0	0	0	0
5503-6	1.15 ^(d)	1.15 ^(d)	0	0	0	0	0
5549-16	0.08 ^(e)	0.08 ^(e)	0	0	0	0	0
5549-17	0.15 ^(e)	0.15 ^(e)	0	0	0	0	0
5549-18	1.21 ^(e)	1.21 ^(e)	0	0	0	0	0
5549-19	1.04 ^(e)	1.04 ^(e)	0	0	0	0	0
5549-20	4.05 ^(e)	4.05 ^(e)	0	0	0	0	0
5549-21	5.27 ^(e)	5.27 ^(e)	0	0	0	0	0
5549-26	1.16 ^(e)	1.16 ^(e)	0	0	0	0	0
5549-28	42.24 ^(e)	42.24 ^(e)	0	0	0	0	0
71-9	0.57 ^(d)	0.57 ^(d)	0	0	0	0	0
5552-1	0.13 ^(d)	0.13 ^(d)	0	0	0	0	0
5552-2	0.9 ^(d)	0.9 ^(d)	0	0	0	0	0
56-1	7.02 ^(a)	7.02 ^(a)	0	0	0	0	0
Insignificant Activities	(a)(b)	(a)(b)	Negl.	4.0 ^(f)	Negl.	Negl.	4.0 ^(f)
Total Emissions	greater than 250	greater than 250	37.0	37.5	141.5	157.4	29.0

Negl. - Negligible; emissions less than 0.01 tons per year.

Note that unless otherwise stated, the emissions presented in the table above are equal to the uncontrolled potential to emit.

(a) Pursuant to 326 IAC 6-1-12, the particulate matter emissions from these facilities are limited as indicated. See section D.3 of the permit for the exact limits for the insignificant activities.

(b) Pursuant to 326 IAC 6-1-2, the particulate matter emissions from these facilities shall not exceed 0.03 gr/dscf.

(c) Pursuant to SSM 097-11362-00042, issued August 31, 2000, the PM/PM10 emissions from unit 577-2 are limited, as indicated, to render the requirements of 326 IAC 2-2 not applicable.

(d) Pursuant to CP 097-00042-97-01, issued March 24, 1997, M 097-00042-99-01, issued February 25, 1999, and SSM 097-11362-00042, issued August 31, 2000, the PM/PM10 emissions from these facilities are limited, as indicated, to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

(e) Pursuant to CP 097-00042-97-01, issued March 24, 1997, M 097-00042-99-01, issued February 25, 1999, and SSM 097-11362-00042, issued August 31, 2000, the PM/PM10 emissions from these facilities shall not exceed to 0.01 gr/dscf and various pound per hour limits in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. The ton per year emissions presented in the table are the lb per hour emission equivalents based on 8760 hours per year.

(f) The source estimates that the VOC/HAP emissions from various insignificant activities are approximately 4.0 tons per year.

(g) Pursuant to CP 097-00042-95-03, issued October 6, 1995, the VOC (methanol, a HAP) emissions from unit 575-2 shall not exceed 24.99 tons per year in order to render the requirements of 326 IAC 8-1-6 not applicable.

(h) Pursuant to CP 097-00042-97-01, issued March 24, 1997, the SO₂ emissions from 5502-1A, 5502-1B, 5502-1C, and 5502-1D shall not exceed a total of 8.05 pounds per hour (equivalent to 35.3 tons per year) in order to render the requirements of 326 IAC 2-2 not applicable.

(i) Pursuant to CP 097-00042-97-01, issued March 24, 1997, the NO_x emissions from 5502-1A, 5502-1B, 5502-1C, and 5502-1D shall not exceed a total of 39 tons per year in order to render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable.

(j) Pursuant to M 097-00042-99-01, issued February 25, 1999, the PM/PM₁₀ emissions from stack 5502-7 (exhausting emissions from 5502-1A, 5502-1B, 5502-1C, and 5502-1D) shall not exceed 0.0114 gr/dscf and a total of 19.86 tons per year in order to render the requirements of 326 IAC 2-2 not applicable.

(k) Pursuant to CP 097-00042-99-01, issued June 11, 1999, the PM/PM₁₀ emissions from 40-3 shall not exceed 0.016 gr/dscf and 42.3 tons per year.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO ₂	maintenance attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	maintenance attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marion County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
Since this type of operation is 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) This source is not subject to the requirements of the New Source Performance Standard (NSPS), 326 IAC 12, 40 CFR Part 60 Subpart DD (Standards of Performance for Grain Elevators), because the grain elevator, unit 56-2, has a storage capacity of less than 1.0 million U.S. bushels.

- (b) This source is not subject to the requirements of the New Source Performance Standard (NSPS), 326 IAC 12, 40 CFR Part 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels, including Petroleum Liquid Storage Vessels, For Which Construction, Reconstruction, or Modification Commenced After July 23, 1984) because all of the tanks located at the source that store volatile organic liquids have a capacity less than 40 m³ and were constructed prior to July 23, 1984.
- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, 40 CFR Part 63, Subpart T, because the source does not operate any degreasers that use any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.
- (d) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source does not include one or more units that belong to one or more source categories affected by the Section 112(j) MACT Hammer date of May 15, 2002.
- (e) This source is subject to the provisions of 40 CFR Part 64, Compliance Assurance Monitoring. In order for this rule to apply, a pollutant-specific-emissions-unit at a source that requires a Part 70 or Part 71 permit must meet three criteria for a given pollutant: 1) the unit is subject to an applicable emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and 3) the unit has the potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source. This source contains a number of facilities that have a pre-control potential to emit PM greater than 100 tons per year, are subject to an emission limitation for PM, and use a PM control device to achieve compliance with the respective limitation. Pursuant to 40 CFR 64.5(b), the Permittee is required to submit the information required under 40 CFR 64.4 as part of the Part 70 renewal application.

State Rule Applicability - Entire Source

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

The source submitted a Preventive Maintenance Plan (PMP) in May, 2002.

326 IAC 2-3 (Emission Offset)

This source is located in Marion county. Marion county was previously classified as a non-attainment area for TSP and ozone. As a result, several limits from past permits were required to render the requirements of 326 IAC 2-3 not applicable. Now that Marion county is no longer classified as a non-attainment area for any criteria pollutant, the requirements of 326 IAC 2-3 do not apply for any new modifications. All federally enforceable TSP/PM and NO_x limits from past permits, pursuant to 326 IAC 2-3, have been incorporated into this Part 70 permit under 40 CFR 52.21 and 326 IAC 2-2 (PSD). The PSD summary below includes references to 326 IAC 2-3 to clarify the chronological NSR history. References to 326 IAC 2-3 are not included in the corresponding permit conditions.

326 IAC 2-2 (Prevention of Significant Deterioration)

This source was originally constructed in the 1960s. The source was an existing major source upon promulgation of the PSD rules. There is very little information regarding the source's permitting history from the time it was constructed until the issuance of OP 097-00042-91-01, issued November 13, 1991. However, according to that permit, each unit constructed after the promulgation of the PSD rules and prior to the issuance of OP 097-00042-91-01, has allowable emissions less than the relevant PSD thresholds. OP 097-00042-91-01, issued November 13, 1991, is considered to be a comprehensive document that accurately details all of the necessary requirements for the facilities located at the source at that time. As a result, the following PSD

summary begins with the issuance of OP 097-00042-91-01, issued November 13, 1991 (Note that the source does not belong to 1 of the 28 PSD source categories with a major source threshold of 100 tons per year):

On November 13, 1991, the source was issued OP 097-00042-91-01, which included emission limitations for numerous facilities that existed at that time. The source was a major source for both PSD and Emission Offset rules at the time this permit was issued.

On June 15, 1992, the source was issued CP 097-00042-92-01. This permit was superseded by CP 097-00042-93-01, issued May 10, 1993.

On May 10, 1993, the source was issued CP 097-00042-93-01 for the construction of: dryers 575-3, 5549-1, and 5549-2; a number of hoppers; and other supporting equipment. At the time of the modification, Marion County was designated as a non-attainment area for TSP and ozone. The following netting analysis was completed such that the modification was not subject to the requirements of 326 IAC 2-2, 40 CFR 52.21 (PSD), and 326 IAC 2-3 (Emission Offset).

Pollutant	TSP	PM ₁₀	SO ₂	VOC	CO	NO _x
PTE of Modification	160.44	138.88	-	-	-	58.26
Contemporaneous emission increases	0	0	-	-	-	0
Contemporaneous emission decreases (from the shutdown of boilers 20-2, 20-4, 20-6, and 20-10)	187.36	128.12	-	-	-	656.10
Net Change in Emissions	-26.92	10.76	-	-	-	-597.84
PSD/EO Significance Level	25	15	40	40	100	40

Pursuant to CP 097-00042-93-01, issued May 10, 1993, the particulate emissions from 575-3, 577-5 through 577-10, 5549-1, 5549-2, 5549-3, and 5549-7 through 5549-11 were limited to render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable. The specific limitations from CP 097-00042-93-01, issued May 10, 1993 have not been included here as these limitations have been replaced by those contained in CP 097-00042-97-01, issued March 24, 1997. See the *Existing Approvals* section of this document for the specific conditions that were revised.

On August 29, 1994, the source was issued CP 097-00042-94-01 to modify unit 40-3. The potential to emit of the modification was less than relevant PSD and Emission Offset thresholds so the requirements of 40 CFR 52.21 and 326 IAC 2-2 did not apply.

On October 26, 1994, the source was issued CP 097-00042-94-02 to modify unit 40-4. The potential to emit of the modification was less than relevant PSD and Emission Offset thresholds so the requirements of 40 CFR 52.21 and 326 IAC 2-2 did not apply.

On February 15, 1995, the source was issued CP 097-00042-95-01 to construct units 5549-4, 5549-12, 5549-13, and 5549-14. Pursuant to CP 097-00042-95-01, issued February 15, 1995, the PM and PM10 emissions from 5549-4, 5549-12, 5549-13, and 5549-14 were limited to render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable. The specific limitations from CP 097-00042-95-01, issued February 15, 1995 have not been included here as these limitations have been replaced by those contained in CP 097-00042-97-01, issued March 24, 1997; see the review of CP 097-00042-97-01, issued March 24, 1997, below for more information. See the *Existing Approvals* section of this document for the specific conditions that were revised.

On March 8, 1995, the source was issued CP 097-00042-95-02 to replace dryer 575-2 which was originally constructed in 1979. The increase in PM emissions from the replacement was 4.61 tpy; less than the relevant PSD thresholds so unit 575-2 is not subject to the requirements of 40 CFR 52.21 and 326 IAC 2-2.

On October 6, 1995, the source was issued CP 097-00042-95-03 to limit the VOC emissions from 575-2. The VOC emissions were limited to less than 25 tons per year in order to render the requirements of 326 IAC 8-1-6 not applicable. As a result, the PTE of the modification was less than the relevant PSD thresholds and unit 575-2 is not subject to the requirements of 40 CFR 52.21 and 326 IAC 2-2.

On October 24, 1996, the source was issued CP 097-00042-96-01 to modify 42-1 and 42-9. Pursuant to OP 097-00042-91-01, issued November 13, 1991, the PM emissions from units 42-1 and 42-9 shall not exceed 0.9 tons per year, each. These limits were incorporated by CP 097-00042-96-01. As a result, the PTE of the modification was less than the relevant PSD thresholds and units 42-1 and 42-9 are not subject to the requirements of 40 CFR 52.21 and 326 IAC 2-2.

On October 24, 1996, the source was issued CP 097-00042-96-02 to modify 56-1. Pursuant to OP 097-00042-91-01, issued November 11, 1991, and 326 IAC 6-1-12, the PM emissions from unit 56-1 shall not exceed 0.02 gr/dscf and 7.02 tpy. These limits were included in CP 097-00042-96-02. As a result, the PTE of the modification was less than the relevant PSD thresholds and unit 56-1 is not subject to the requirements of 40 CFR 52-21 and 326 IAC 2-2.

On March 24, 1997, the source was issued CP 097-00042-97-01, referred to as the "By-Products Rebuild Project" for the: 1) construction of units 5502-1A, 5502-1B, 5502-1C, 5502-1D, 5502-3, 5502-4, 5502-5, 5503-1, and 5503-2 through 5503-5, and 2) increase the allowable emissions of numerous existing units. At the time of the modification, Marion County was designated as a non-attainment area for TSP. The following netting analysis was completed such that the modification was not subject to the requirements of 326 IAC 2-2, 40 CFR 52.21 (PSD), and 326 IAC 2-3 (Emission Offset).

Pollutant	TSP	PM ₁₀	SO ₂	VOC	CO	NO _x
PTE of Modification	37.20	32.37	39	0.15	1.83	39
Contemporaneous emission increases	90.69	77.5	-	-	-	-
Contemporaneous emission decreases (from the shutdown and removal of numerous units)	124.71	104.07	-	-	-	-
Net Change in Emissions	3.18	5.80	39	0.15	1.83	39
PSD Significance Level	25	15	40	40	100	40

Pursuant to CP 097-00042-97-01, issued March 24, 1997, the following units are limited as indicated in the table below in order to render the requirements of 40 CFR 52.21, 326 IAC 2-2 (PSD), and 326 IAC 2-3 (Emission Offset) not applicable:

Unit ID	PM/PM10 limit (gr/dscf)	PM/PM10 limit (lb/hr)	PM/PM10 limit (ton/yr)
5503-1	0.01	1.53	6.69
5503-2 through 5503-5	0.01	0.99	4.32
71-9	0.01	0.13	0.57
577-5	0.009	0.35	1.52
577-6	0.009	0.35	1.52
577-8	0.009	0.35	1.52
577-9	0.009	0.35	1.52
577-10	0.009	0.35	1.52

Unit ID	PM/PM10 limit (gr/dscf)	PM/PM10 limit (lb/hr)	PM/PM10 limit (ton/yr)
5549-3	0.01	0.15	0.64
5549-7	0.01	0.039	0.17
5549-8	0.01	0.039	0.17
5549-9	0.01	0.039	0.17
5549-10	0.01	0.039	0.17
5549-4	0.01	0.15	0.64
5549-12	0.01	0.13	0.57
5549-13	0.01	0.98	4.29
5549-14	0.01	0.24	1.07
5552-1	0.01	0.03	0.13
5552-2	0.01	0.21	0.9

The emission limitations for units 5502-1A, 5502-1B, 5502-1C, 5502-1D, 5502-3, 5502-4, and 5502-5 are not included because these limitations were replaced pursuant to SSM 097-11362-00042, issued August 31, 2000. See the Existing Approvals section of this document for the specific conditions that were revised.

Pursuant to CP 097-00042-97-01, issued March 24, 1997, and A 097-00042-98-01, issued April 15, 1998 (and revised by this permit; see Existing Approvals section):

- (1) The combined input of corn grind to units 5502-1A, 5502-1B, 5502-1D, 5502-3, 5502-4, 5502-5, 5502-6, 5502-7, 5503-1, 5503-2, 5503-3, 5503-4, 5503-5, and 5503-6 shall not exceed 29,584,000 bushels per twelve consecutive month period with compliance determined at the end of each month and the total emission rate shall not exceed 0.0030 lb PM/PM10 per bushel. Compliance with this limit is equivalent to total PM/PM10 emissions of less than or equal to 44.396 tons per year.
- (2) The combined input of starch for units 5549-1 and 5549-2 shall not exceed 22,500 tons per twelve consecutive month period with compliance determined at the end of each month and the total emission rate shall not exceed 2.50 lb PM/PM10 per ton of starch. Compliance with this limit is equivalent to total PM/PM10 emissions of less than 28.11 tons per year and will render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset) not applicable.
- (3) The input of starch for unit 5549-13 shall not exceed 14,010 tons per twelve consecutive month period with compliance determined at the end of each month. The emission rate shall not exceed 0.61 lb PM/PM10 per tons of starch. This production limitation is equivalent to PM/PM10 emissions of less than 4.29 tons per year. Compliance with this limitation will render the requirements of 40 CFR 52.21, 326 IAC 2-2 (PSD), and 326 IAC 2-3 (Emission Offset) not applicable.
- (4) The SO₂ emissions from units 5502-1A, 5502-1B, 5502-1C, and 5502-1D, shall not exceed 8.05 pounds per hour (equivalent to 35.26 tons per year). The scrubber shall be operated at all times 5502-1C is in operation to ensure compliance with this limit. Compliance with this limitation will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (PSD) not applicable.
- (5) The combined input of natural gas to 5502-1A, 5502-1B, 5502-1C, and 5502-1D shall not exceed 1,851 million cubic feet (MMcf) per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit is equivalent to NO_x emissions of less than or equal to 39 tons per twelve consecutive month period.

The natural gas limitation for 5502-1A, 5502-1B, 5502-1C, and 5502-1D was determined based on the following equation and the results of tests completed September 5-6, 2001:

$$E = 78,000 / [(B \times C) / D]$$

Where:

- B = NO_x concentration in exhaust gas from most recent stack test (lb/dscf)
- C = Dry standard exhaust flowrate during most recent stack test (dscf/hr)
- D = Natural gas usage during the most recent stack test (MMCF/hr)
- E = Allowable natural gas usage for units 5502-1A, 5502-1B, 5502-1C, 5502-1D (MMCF per twelve consecutive month period)

Compliance with this limitation will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (PSD) not applicable.

- (6) Pursuant to CP 097-00042-97-01, issued March 24, 1997, SSM 097-11362-00042, issued August 31, 1996, and in order to render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable, the following facilities are limited as indicated in the table below:

Unit/ Stack ID	PM/PM10 Limit (gr/dscf)	PM/PM10 Limit (lb/hr)	PM/PM10 Limit (ton/yr)
575-3	0.012	5.63	24.65
5549-1	0.02	-	14.06
5549-2	0.02	-	14.06
5549-28	0.025	9.64	42.24

Compliance with the aforementioned (Item 2 above) production and lb/ton emission limits will ensure compliance with the ton/yr limits for units 5549-1 and 5549-2. Therefore, an additional lb/hr limit is not necessary for units 5549-1 and 5549-2.

On February 25, 1999, the source was issued M 097-00042-99-01 to add several emission points and change the emission limitations of several facilities originally limited by CP 097-00042-97-01, issued March 24, 1997. A netting analysis was completed with M 097-00042-99-01 and the net emissions increase of the modification was less than the relevant PSD thresholds so the requirements of 40 CFR 52.21 and 326 IAC 2-2 were not applicable. See the Existing Approvals section, under the subsection regarding revised conditions, paragraph (e), for an explanation of the removal of the limits on stack 5502-1 and the revision to the limits on stack 5502-7. Pursuant to M 097-00042-99-01, issued February 25, 1999, the following facilities are limited as indicated in the table below in order to render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable:

Unit ID	PM/PM10 limit (gr/dscf)	PM/PM10 Limit (lb/hr)	PM/PM10 limit (ton/yr)
5502-3	0.01	0.96	4.212
5502-4	0.01	0.016	0.068
5502-5	0.01	1.13	4.964
5502-6	0.01	0.99	4.349
5502-7	0.0114	4.53	19.856

Unit ID	PM/PM10 limit (gr/dscf)	PM/PM10 Limit (lb/hr)	PM/PM10 limit (ton/yr)
5503-1	0.01	1.53	6.69
5503-2	0.01	0.71	3.11
5503-6	0.01	0.26	1.148

Note that 5502-1D exhausts to either the inlet of 5502-1C or stack 5502-7.

On June 11, 1999, the source was issued CP 097-00042-99-01 to increase the production capacity of, increase the exhaust flow rate of, and install a higher efficiency scrubber on, unit 40-3. The potential to emit of the modification was greater than the relevant PSD thresholds so the following netting analysis was completed such that the net emissions increase of the modification was not subject to the requirements of 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration).

Pollutant	PM	PM ₁₀	SO ₂	VOC	CO	NO _x
PTE of Modification	25.75	25.75	-	-	-	-
Contemporaneous emission increases	50.00	48.06	-	-	-	-
Contemporaneous emission decreases (from the shutdown and removal of numerous units)	114.36	95.80	-	-	-	-
Net Change in Emissions	-38.61	-21.99	-	-	-	-
PSD Significance Level	25	15	40	40	100	40

Pursuant to CP 097-00042-99-01, issued June 11, 1999, the starch produced from unit 40-3 shall not exceed 145,610 tons per twelve consecutive month period with compliance determined at the end of each month and the emission rate shall not exceed 0.581 lb PM/PM10 per ton of starch. This limitation is equivalent to PM/PM10 emissions of less than 42.3 tons per year. Compliance with this limit shall render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable and ensure compliance with 326 IAC 6-1-12. See the Existing Approvals section, under the subsection regarding revised conditions, of this document for more information.

On March 10, 2000, the source was issued MSM 097-11764-00042 to increase the exhaust flow rate and replace the baghouse controlling emissions from unit 577-2. The potential to emit of the modification was less than the relevant PSD thresholds so the requirements of 40 CFR 52.21 and 326 IAC 2-2 were not applicable.

On August 31, 2000, the source was issued SSM 097-11362-00042 for the construction of a spray agglomeration process. The following netting analysis was completed such that the modification was not subject to the requirements of 326 IAC 2-2 and 40 CFR 52.21.

Pollutant	PM	PM ₁₀	SO ₂	VOC	CO	NO _x
PTE of Modification	52.22	52.22	0.06	0.52	7.9	10.95
Credited contemporaneous emission increases	55.65	55.65	-	-	-	-
Credited contemporaneous emission decreases (from the shutdown and removal of numerous units)	127.47	116.36	-	-	-	-
Net Change in Emissions	-19.60	-8.49	0.06	0.6	7.9	10.95
PSD Significance Level	25	15	40	40	100	40

Pursuant to SSM 097-11362-00042, issued August 31, 2000, and as revised by this permit (see Existing Approvals for details), the following facilities are limited as indicated in the table below in order to render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable:

Unit ID	PM/PM10 Limit (gr/dscf)	PM/PM10 Limit (lb/hr)	PM/PM10 Limit (ton/yr)
5549-16	0.01	0.02	0.08
5549-17	0.01	0.04	0.15
5549-18	0.01	0.28	1.21
5549-19	0.01	0.24	1.04
5549-20	0.01	0.93	4.05
5549-21	0.01	1.2	5.27
5549-26	0.01	0.26	1.16
5549-28	0.025	9.64	42.24
577-2	0.01	1.29	5.65

Based on results from testing (required pursuant to SSM 097-11362-00042, issued August 31, 2000) completed June 24, 2002, units 5549-20 and 5549-28 are in compliance with their respective limits.

In addition, the following charts summarize the aggregate allowable emissions from all permits issued in any twelve consecutive month period in order to determine the PSD applicability of the permits issued during that time. Each table represents a different twelve consecutive month period.

permit	issuance date	Total Allowable PTE Associated with the Permit					
		PM	PM10	SO2	VOC	NOx	CO
CP 94-01	8/29/94	1.07	1.07	1.58	0.49	16.6	6.06
CP 94-02	10/26/94	0.98	0.98	1.31	0.4	13.8	5.05
CP 95-01	2/15/95	6.33	6.33	0	0	0	0
CP 95-02	3/8/95	NA	NA	NA	NA	NA	NA
Totals		8.38	8.38	0.1	0.89	30.24	11.11
PSD threshold		25	15	40	40	40	100

Note that the emissions from CP 95-02 (issued 3/8/95) are not included in this table because it permitted the replacement of dryer 575-2. The replacement of dryer 575-2 is exempt from PSD considerations.

permit	issuance date	Total Allowable PTE Associated with the Permit					
		PM	PM10	SO2	VOC	NOx	CO
CP 95-01	2/15/95	12.86	12.86	0	0	0	0
CP 95-02	3/8/95	NA	NA	NA	NA	NA	NA
CP 95-03	10/6/95	0	0	0	<25	0	0
Totals		12.86	12.86	0	<25	0	0

PSD threshold	25	15	40	40	40	100
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Note that the emissions from CP 95-02 (issued 3/8/95) are not included in this table because it permitted the replacement of dryer 575-2. The replacement of dryer 575-2 is exempt from PSD considerations.

permit	issuance date	Total Allowable PTE Associated with the Permit					
		PM	PM10	SO2	VOC	NOx	CO
E 96-01	10/24/96	1.8	1.8	0	0	0	0
E 96-02	10/25/96	0.2	0.2	0	0	0	0
CP 97-01	3/24/97	3.18	3.18	<39	0.15	<39	1.83
Totals		5.18	5.18	<39	0.15	<39	1.83
PSD threshold		25	15	40	40	40	100

permit	issuance date	Total Allowable PTE Associated with the Permit					
		PM	PM10	SO2	VOC	NOx	CO
M 99-01	2/25/99	12.99	12.99	0	0	0	0
CP 99-01	6/11/99	-38.61	-21.99	0	0	0	0
Totals		-25.62	9.0	0	0	0	0
PSD threshold		25	15	40	40	40	100

permit	issuance date	Total Allowable PTE Associated with the Permit					
		PM	PM10	SO2	VOC	NOx	CO
MSM 11764	3/10/00	12.59	12.59	0	0	0	0
SSM 11362	8/31/00	-30.69	-14.08	0	0	0	0
Totals		-18.1	-1.49	0	0	0	0
PSD threshold		25	15	40	40	40	100

As the previous charts illustrate, any units permitted within a twelve consecutive month period were properly limited in order to render the requirements of 326 IAC 2-2 (PSD) not applicable.

326 IAC 2-4.1 (Hazardous Air Pollutants)

None of the facilities located at this source are subject to the requirements of 326 IAC 2-4.1 because each facility has the potential to emit less than 10 tons per year of any single HAP, and less than 25 tons per year of any combination of HAPs, or was constructed before July 27, 1997.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Marion County and has the potential to emit more than ten (10) tons per year of 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 April 15 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 thirty percent (30%) 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.

326 IAC 6-4 (Fugitive Dust Emissions)

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 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is located in the Center Township of Marion county. The source's potential to emit fugitive PM from vehicular traffic on paved and unpaved roads is 15.4 tons per year. Therefore, the source is not subject to the requirements of 326 IAC 6-5.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is not subject to the requirements of 326 IAC 8-6 because the source's total potential to emit VOC is less than 100 tons per year.

State Rule Applicability - Units 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1, 5549-2, 575-2, 5502-1A, 5502-1B, 5502-1C, 5502-1D, and 5549-28

326 IAC 6-1-2 (Particulate Matter)

Facilities 575-3, 5549-1, 5549-2, 5502-1A, 5502-1B, 5502-1C, and 5502-1D are subject to the requirements of 326 IAC 6-1-2 because the source has a potential to emit greater than 100 tons per year, the source is located in Marion County, and each facility is not specifically listed in 326 IAC 6-1-12.

Pursuant to 326 IAC 6-1-2, the particulate matter emissions from each facility shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

326 IAC 6-1-12 (Particulate Matter in Marion County)

Facilities 40-4, 40-3, 40-2, 575-1, and 575-2 are subject to the requirements of 326 IAC 6-1-12 because they are specifically listed in the rule. Pursuant to 326 IAC 6-1-12, facilities 40-4, 40-3, 40-2, 575-1, and 575-2 are limited as indicated in the table below:

Facility	PM Limit (gr/dscf)	PM Limit (ton/yr)
40-4	0.02	44.1
40-3	0.016	42.3
40-2	0.02	31.9
575-1	0.018	32.4
575-2	0.011	32.4

In order to ensure compliance with 326 IAC 6-1-12, the source as voluntarily accepted lower gr/dscf limits for units 40-2 and 575-1. As a result, the compliance with the following limits will ensure compliance with 326 IAC 6-1-12:

Facility	PM Limit (gr/dscf)	PM Limit (ton/yr)
40-4	0.02	44.1
40-3	0.016	42.3
40-2	0.016	31.9
575-1	0.011	32.4
575-2	0.011	32.4

Pursuant to CP 097-00042-95-02, issued March 8, 1995, the amount of dry product processed by unit 575-2 shall not exceed 123,300 tons per twelve month consecutive period with compliance determined at the end of each month. This limit is equivalent to PM emissions of less than or equal to 32.4 tons per year. Compliance with this limit will satisfy the requirements of 326 IAC 6-1-12.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1, none of the facilities located at this source are subject to the requirements of 326 IAC 6-3-2 because the source is subject to the requirements of 326 IAC 6-1.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Units 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1, 5549-2, 575-2, 5502-1A, 5502-1B, 5502-1C, and 5502-1D are not subject to the requirements of 326 IAC 7-1.1 because each facility has the potential to emit SO₂ less than 25 tons per year.

326 IAC 8-1-6 (Volatile Organic Compounds - BACT)

Pursuant to CP 097-00042-95-03, issued October 6, 1995, the amount of methanol emitting corn starch produced from unit 575-2 shall not exceed 11,995,200 pounds per twelve consecutive month period with compliance determined at the end of each month and the emission rate shall not exceed 0.0041 lb VOC per lb of starch produced. Compliance with this limit is equivalent to VOC emissions of less than 25 tons per year and will render the requirements of 326 IAC 8-1-6 not applicable.

Based on results from testing completed April 18, 1996, unit 575-2 is in compliance with this limit.

State Rule Applicability - All other significant emission units

326 IAC 6-1-2 (Particulate Matter)

Facilities 71-7, 577-2, 54-1, 577-5 through 577-10, 5549-3, 5549-7 through 5549-10, 5549-12, 5549-13, 5549-14, 42-9, 5502-3, 5502-4, 5502-5, 5503-1, 5503-2 through 5503-5, the spray agglomerator process (consisting of units 5549-16 through 5549-21, and 5549-26), 71-9, 5552-1, and 5552-2 are subject to the requirements of 326 IAC 6-1-2 because the source has a potential to emit greater than 100 tons per year, the source is located in Marion County, and each facility is not specifically listed in 326 IAC 6-1-12.

Pursuant to 326 IAC 6-1-2, the particulate matter emissions from each facility shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

326 IAC 6-1-12 (Particulate Matter in Marion County)

Facilities 42-10, 56-1, and 71-1 are subject to the requirements of 326 IAC 6-1-12 because they are specifically listed in the rule.

- (a) Pursuant to 326 IAC 6-1-12, the particulate matter emissions from facility 42-10 shall not exceed 0.03 gr/dscf and 2.4 tons per year.

- (b) Pursuant to 326 IAC 6-1-12, the particulate matter emissions from facility 56-1 shall not exceed 0.02 gr/dscf and 7.02 tons per year.
- (c) Pursuant to 326 IAC 6-1-12, the particulate matter emissions from facility 71-1 shall not exceed 0.03 gr/dscf and 0.9 tons per year.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1, none of the facilities located at this source are subject to the requirements of 326 IAC 6-3-2 because the source is subject to the requirements of 326 IAC 6-1.

State Rule Applicability - Storage tank (unit 40-5)

326 IAC 8 (Volatile Organic Compounds)

Unit 40-5 is not subject to the requirements of 326 IAC 8-1-6 because it was constructed prior to January 1, 1980.

Unit 40-5 is not subject to the requirements of 326 IAC 8-4-3 because unit 40-5 is not a petroleum liquid storage vessel.

Unit 40-5 is not subject to the requirements of 326 IAC 8-9 because it is not located at a source located in Clark, Floyd, Lake, or Porter county.

State Rule Applicability - Specifically Regulated Insignificant Activities

326 IAC 6-1-2 (Particulate Matter)

All insignificant activities which have a potential to emit PM, that are not subject to the requirements of 326 IAC 6-1-12, are subject to the requirements of 326 IAC 6-1-2 because the source has a potential to emit greater than 100 tons per year and the source is located in Marion County.

Pursuant to 326 IAC 6-1-2, the particulate matter emissions from each facility shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

326 IAC 6-1-12 (Particulate Matter in Marion County)

The insignificant units listed in the table below are subject to the requirements of 326 IAC 6-1-12 because they are specifically listed in the rule. Pursuant to 326 IAC 6-1-12, the following facilities are limited as indicated in the table below:

Facility	PM Limit (gr/dscf)	PM Limit (ton/yr)
56-2	0.01	11.3
71-2	0.03	2.6
61-6	0.03	0.1
61-14A	0.029	0.6
61-14	0.028	1.2
42-4	0.029	2.3
61-9	0.016	4.1
42-1	0.03	0.9
42-8	0.03	4.2
42-7A	0.032	1.7
42-7B	0.032	1.7

Facility	PM Limit (gr/dscf)	PM Limit (ton/yr)
42-7C	0.032	1.7
42-3A	0.032	1.8
42-3B	0.032	1.8
42-3C	0.032	1.8
42-3D	0.032	1.8
42-3E	0.032	1.8
42-3F	0.032	1.8
71-5A	0.026	0.3
71-5B	0.026	0.3
71-5C	0.026	0.3
71-5D	0.026	0.3
71-5E	0.026	0.3
71-5F	0.026	0.3
71-5G	0.026	0.3
71-5H	0.026	0.3
71-5I	0.026	0.3
71-5J	0.026	0.3
71-5K	0.026	0.3
71-5L	0.026	0.3

326 IAC 8-3-2 (Volatile Organic Compounds)

This source is located in Marion county. The insignificant degreasing operations (M1 through M4 and RSP shop) are cold cleaner degreasers constructed after January 1, 1980. Therefore, these insignificant degreasing operations are subject to the requirements of 326 IAC 8-3-2.

Pursuant to 326 IAC 8-3-2, the insignificant degreasing operations (M1 through M4) are subject to the requirements of this rule. The owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Volatile Organic Compounds)

The insignificant degreasing operations (M1 through M4) conducted at this source, located in Marion County, were constructed prior to July 1, 1990. Therefore, the insignificant degreasing operations are subject to the requirements of this rule.

Pursuant to 326 IAC 8-3-5, the owner or operator shall ensure that the following requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (6) Close the cover whenever articles are not being handled in the degreaser.
- (7) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (8) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

PM/PM10 testing is not required for any facilities located at this source because the PM emissions from any one facility do not account for a significant portion of the source's potential to emit PM/PM10. All PM/PM10 tests required in previous permits have been completed. Compliance with 326 IAC 2-2, 326 IAC 6-1-2, and 326 IAC 6-1-12 limitations is expected with the use of the baghouses and scrubbers. Compliance monitoring of the control devices will ensure compliance with the limitations.

VOC testing is not required for any facilities located at this source because no facilities utilize a control device and VOC is not a major pollutant.

SO₂ testing is not required for any facilities located at this source because SO₂ is not a major pollutant.

NO_x testing is not required for any facilities located at this source because each facility accounts for less than the majority of the source's potential to emit NO_x.

CO testing is not required for any facilities located at this source because each facility accounts for less than the majority of the source's potential to emit CO.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, and OES, 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. Units 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1, 5549-2, 575-2, 5502-1A, 5502-1B, 5502-1C, and 5549-28 have applicable compliance monitoring conditions as specified below:
 - (a) Visible emission notations of exhaust from stacks 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1, 5549-2, 575-2, 5502-7, and 5549-28 shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -

Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

- (b) The Permittee shall monitor the pH and flow rate of the of the liquid through the nozzles of the scrubber at least once per week of the scrubber used to control particulate and SO₂ emissions from units 5502-1A through 5502-1C. When, for any one reading, the pH of the liquid used in the scrubber is less than 5.5, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. When, for any one reading, the flow rate through the nozzles of the scrubber is outside the range of 110 to 145 gallons per minute, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pH or flow rate reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (c) The Permittee shall monitor the exhaust air stream pressure drop across the scrubber, and scrubber recirculation rate at least once per week from the scrubbers controlling emissions from units 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1, 5549-2, and 575-2. When, for any one reading, the pressure drop across the scrubber, is outside the range of 6.0 to 12.0 inches of water, or a range established during the last stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. When, for any one reading, the recirculation rate is less than the manufacturer's specifications, or a rate established during the most recent stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure drop or recirculation rate reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit. The instruments used for determining the pH, pressure drop, or flow rate shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated, maintained, and operated according to the manufacturer's specifications.
- (d) Pursuant to SSM 097-11362-00042, issued August 31, 2000, the Permittee shall monitor the total static pressure drop across the scrubber at least once daily from the scrubber controlling emissions from unit 5549-28 when 5549-28 is in operation. When, for any one reading, the pressure drop across the scrubber is outside the normal range of 6.0 and 12.0 inches of water, or a range that indicates proper operation of the unit, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit. The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated, maintained, and operated according to the manufacturer's specifications.
- (e) Pursuant to SSM 097-11362-00042, issued August 31, 2000, an inspection of the scrubber controlling emissions from 5549-28 shall be performed semi-annually. Repairs or replacement of defective components shall be performed in

accordance with the Preventive Maintenance Plan. Inspections required by this condition shall not be performed in consecutive months.

- (f) An inspection of each scrubber, controlling emissions from units 5502-1A through 5502-1C, 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1, 5549-2, and 575-2, shall be performed each calendar quarter. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.

These monitoring conditions are necessary because the scrubbers must operate properly to ensure compliance with 326 IAC 6-1-2 and 326 IAC 6-1-12, and render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable.

- 2. Facilities 577-2, 5549-16 through 5549-21, 5549-26, 577-5 through 577-10, 5549-3 through 5549-14, 5502-3, 5502-4, 5502-5, 5503-1, and 5503-2 through 5503-5 have applicable compliance monitoring conditions as specified below:
 - (a) Visible emission notations of the exhaust from stacks 577-2, 5549-16 through 5549-21, 5549-26, 5549-28, 577-5 through 577-10, 5549-3 through 5549-14, 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2, and 5503-6, shall be performed once per shift during normal daylight operations when the respective facilities are in operation. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
 - (b) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with facilities 577-2, 5549-16 through 5549-21, 5549-26, 577-5 through 577-10, 5549-3 through 5549-14, 5502-3, 5502-4, 5502-5, 5503-1, and 5503-2 through 5503-5, at least once per shift when the respective facilities are in operation. When, for any one reading, the pressure drop across the baghouses are outside the normal range of 0.0 and 6.0 inches of water or a range established during the last stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit. The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
 - (c) An inspection shall be performed each calendar quarter of all bags controlling the particulate emissions from facilities 577-2, 577-5 through 577-10, 5549-3 through 5549-14, 5502-3, 5502-4, 5502-5, 5503-1, 5503-2 through 5503-5, 5549-16 through 5549-21, and 5549-26. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

These monitoring conditions are necessary because the baghouses must operate properly to ensure compliance with 326 IAC 6-1-2 and 326 IAC 6-1-12, and render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable.

3. Facility 5502-5 has applicable compliance monitoring conditions as specified below:

An inspection shall be performed each calendar quarter of the cyclone controlling the emissions from facility 5502-5. Inspections required by this condition shall not be performed in consecutive months. In the event that cyclone failure has been observed: Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Note that emissions from the cyclone are never exhausted indoors.

These monitoring conditions are necessary because the cyclone must operate properly to ensure compliance with 326 IAC 6-1-2 and render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable.

Facilities 61-15, 42-4, 61-3, 61-9, 61-22, 61-23, 71-7, 578-1, 578-3, 581-2, 577-3, 42-10, 54-1, 63-4, 63-5, 71-1, 42-1, 42-9, and 56-1 use baghouses for particulate control. Compliance monitoring is not required for these facilities because each facility's allowable particulate emission rate is sufficiently low.

Conclusion

The operation of this stationary wet corn milling plant which produces feed, gluten meal, germ meal, and heavy steepwater shall be subject to the conditions of the attached proposed Part 70 Permit No. T097-7714-00042.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name: National Starch and Chemical Company
 Source Location: 1515 South Drover Street, Indianapolis, IN 46221
 County: Marion
 SIC Code: 2046
 Operation Permit No.: T097-7714-00042
 Permit Reviewer: ERG/BS

On July 26, 2003, the Office of Air Quality (OAQ) and City of Indianapolis, Office of Environmental Services (OES) had a notice published at the Warren Library located at 9701 East 21st Street, Indianapolis, IN 46229 stating that National Starch and Chemical Company (“National Starch”) had applied for a Title V Part 70 Operating Permit to operate stationary wet corn milling plant which produces feed, gluten meal, germ meal, and heavy steepwater. The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On August 13, 2003, National Starch submitted comments on the proposed Part 70 permit. The following is a summary of the comments and responses to those comments. Added text is shown as bold and deleted text is shown as ~~strikeout~~. The Table Of Contents has been modified, if applicable, to reflect any changes.

Comment 1:

In Section A.1, please move “Not 1 of 28 source categories” after “Major Source under PSD rules.”

Response to Comment 1:

The following changes were made to the permit:

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 wet corn milling plant which produces feed, gluten meal, germ meal, and heavy steepwater.

Source Location Status: Attainment for all criteria pollutants
 Source Status: Part 70 Permit Program
 Major Source, under PSD Rules
Not 1 of 28 Source Categories
 Major Source, Section 112 of the Clean Air Act
~~Not 1 of 28 Source Categories~~

Comment 2:

Please revise Section A.2 to clarify that 5502-6 is not an emission point for unit 5502-5, but rather a separate emission unit. Please add the following emission unit to Section A.2(v): One (1) Germ

Cooler, constructed in 1997, identified as unit 5502-6, with emissions controlled by a high efficiency cyclone, and exhausting to stack 5502-6.

Response to Comment 2:

The following changes were made to the permit:

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

- (v) One (1) Pellet Cooler **and one (1) Germ Cooler**, identified as units **5502-5 and 5502-6, respectively, each** constructed in 1997, with emissions controlled by a high efficiency cyclone (~~exhausting to stack 5502-6~~), and exhausting to stacks **5502-5 and 5502-6 respectively.**

SECTION D.2 FACILITY OPERATION CONDITIONS

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

...

- (v) One (1) Pellet Cooler **and one (1) Germ Cooler**, identified as units **5502-5 and 5502-6, respectively, each** constructed in 1997, with emissions controlled by a high efficiency cyclone (~~exhausting to stack 5502-6~~), and exhausting to stacks **5502-5 and 5502-6 respectively.**

...

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

(Note that the emission limitations and requirements for emission point 5502-6 do not change as a result of this comment.)

Comment 3:

Condition D.1.1(a)(2) sufficiently restricts the emissions from units 5549-1 and 5549-2 by limiting the: 1) combined input (tons per 12 consecutive month period) of starch to those units, and 2) maximum emission rate of PM/PM10 per ton of starch produced. Compliance with these limits will ensure compliance with the applicable rules on both a short-term and long-term basis. Condition D.1.1(b), which incorporates the limitations of CP 097-00042-97-01, issued March 24, 1997, needlessly adds ton/yr emission limits which were not a part of the original permit. The emission limits from CP 097-00042-97-01, issued March 24, 1997, were structured to provide operational flexibility and minimize emissions because National Starch balances the load on each unit to minimize start-up and shutdown frequencies, which reduces emissions and energy use. As a result, the individual 14.06 tpy limits are superfluous. Please remove the individual ton/yr PM/PM10 limits on 5549-1 and 5549-2 in Condition D.1.1(b).

Response to Comment 3:

The following changes were made to the permit:

D.1.1 Prevention of Significant Deterioration [326 IAC 2-2]

- (b) Pursuant to CP 097-00042-97-01, issued March 24, 1997, SSM 097-11362-00042, issued August 31, 1996, and in order to render the requirements of 40 CFR 52.21 and 326 IAC 2-2 not applicable, the following facilities are limited as indicated in the table below:

Unit/ Stack ID	PM/PM10 Limit (gr/dscf)	PM/PM10 Limit (lb/hr)	PM/PM10 Limit (ton/yr)
575-3	0.012	5.63	24.65
5549-1	0.02	--	14.06 --
5549-2	0.02	--	14.06 --
5549-28	0.025	9.64	42.24

~~Compliance with Condition D.1.1(a)(2) will ensure compliance with the ton/yr limits for units 5549-1 and 5549-2.~~

Comment 4:

Conditions D.1.8(d) and D.2.7(b) state that “the instruments be calibrated, maintained, and operated according to the manufacturer’s specifications.” Please change this language to state that the instruments must be calibrated, maintained, and operated according to the Preventive Maintenance Plan, which is required by Conditions D.1.5 and D.2.4.

Response to Comment 4:

The following changes were made to the permit:

D.1.8 Parametric Monitoring for Scrubbers

- (d) The instruments used for determining the pH, pressure drop, or flow rate shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated, maintained, and operated according to the ~~manufacturer’s specifications~~ **Preventive Maintenance Plan**.

D.2.7 Parametric Monitoring for Baghouses

- (d) The instrument used for the pressure drop shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated, maintained, and operated according to the ~~manufacturer’s specifications~~ **Preventive Maintenance Plan**.

Comment 5:

Specifically regulated insignificant activities (a)(2) through (a)(7), (a)(9) through (a)(15), (a)(39), and (a)(45) should be moved from the “Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and ...” description (Section D.3(a)) to the “Emission units or activities with potential uncontrolled PM10 emissions of less than 5 pounds per hour or 25 pounds per day” description (Section D.3(d)).

Response to Comment 5:

Sections A.3 and D.3 (Specifically Regulated Insignificant Activities) have been revised as follows:

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) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.

~~(1) One (1) sodium sulfate conveying system, identified as unit 40-1; [326 IAC 6-1-2]~~

~~(2) One (1) DSE Hopper #9, identified as unit 42-3A; [326 IAC 6-1-12]~~

~~(3) One (1) DSE Hopper #10, identified as unit 42-3B; [326 IAC 6-1-12]~~

~~(4) One (1) DSE Hopper #11, identified as unit 42-3C; [326 IAC 6-1-12]~~

~~(5) One (1) DSE Hopper #12, identified as unit 42-3D; [326 IAC 6-1-12]~~

~~(6) One (1) DSE Hopper #13, identified as unit 42-3E; [326 IAC 6-1-12]~~

~~(7) One (1) DSE Hopper #14, identified as unit 42-3F; [326 IAC 6-1-12]~~

~~(8) One (1) DSE Negative Receiver, identified as unit 42-6; [326 IAC 6-1-12]~~

~~(9) One (1) DSE Hopper #2, identified as unit 42-7A; [326 IAC 6-1-12]~~

~~(10) One (1) DSE Hopper #4, identified as unit 42-7B; [326 IAC 6-1-12]~~

~~(11) One (1) DSE Hopper #6, identified as unit 42-7C; [326 IAC 6-1-12]~~

~~(12) One (1) DSE Hopper #1, identified as unit 42-8A; [326 IAC 6-1-2]~~

~~(13) One (1) DSE Hopper #3, identified as unit 42-8B; [326 IAC 6-1-2]~~

~~(14) One (1) DSE Hopper #5, identified as unit 42-8C; [326 IAC 6-1-2]~~

~~(15) One (1) DSE Hopper #7, identified as unit 42-8D; [326 IAC 6-1-2]~~

(14) One (1) CWS #8 Mill Receiver; identified as unit 63-1A; [326 IAC 6-1-2]

(15) One (1) CWS Mill; identified as unit 63-17; [326 IAC 6-1-2]

(16) One (1) Starch Filter/Receiver 2 Bld 852, identified as unit 152-7; [326 IAC 6-1-2]

(17) One (1) Starch Mixer 4 Bld 852A Filter Receiver, identified as unit 152-8; [326 IAC 6-1-2]

(18) One (1) Starch Mixer 4 Bld 852A, identified as unit 152-9; [326 IAC 6-1-2]

(19) One (1) Starch Mixer 3 Bld 852A Filter Receiver, identified as unit 152-10; [326 IAC 6-1-2]

(20) One (1) Starch Mixer 3 Bld 852A, identified as unit 152-11; [326 IAC 6-1-2]

~~(16) One (1) CWS Packing Hopper; identified as unit 578-2; [326 IAC 6-1-2]~~

~~(17) One (1) Starch Hopper D/C, identified as unit 128-3; [326 IAC 6-1-2]~~

- (18) — One (1) DSE Railcar Loading - East Track, identified as unit 42-11; [326 IAC 6-1-2]
- (19) — One (1) DSE Railcar Loading - West Track, identified as unit 42-12; [326 IAC 6-1-2]
- (20) — One (1) RSP Bulk Loading Fugitive Dust Collector, identified as unit 577-4A; [326 IAC 6-1-2]
- (21) — One (1) Grain Elevator, identified as unit 56-2; [326 IAC 6-1-12]
- (22) — One (1) Dextrin #1 System Mixer, identified as unit 61-1; [326 IAC 6-1-2]
- (23) — One (1) Dextrin #1 System Cookers, identified as unit 61-2; [326 IAC 6-1-2]
- (24) — One (1) Dextrin #2 System Mixer, identified as unit 61-6; [326 IAC 6-1-12]
- (25) — Two (2) Dextrin #2 System East and West Tanks, identified as unit 61-7; [326 IAC 6-1-2]
- (26) — One (1) Starch Storage Silo #3 Receiver, identified as unit 61-11; [326 IAC 6-1-2]
- (27) — One (1) Starch Storage Silo #1 Receiver, identified as unit 61-12; [326 IAC 6-1-2]
- (28) — One (1) Starch Storage Silo #1, identified as unit 61-13; [326 IAC 6-1-2]
- (29) — One (1) Dextrin #1 System Packer, identified as unit 61-14; [326 IAC 6-1-12]
- (30) — One (1) DSW Chemical Blender Tank; identified as unit 61-14A; [326 IAC 6-1-12]
- (31) — One (1) Dextrin System Acidifiers; identified as unit 61-16; [326 IAC 6-1-2]
- (32) — One (1) Dextrin #2 System Cooler; identified as unit 61-18; [326 IAC 6-1-2]
- (33) — One (1) Dextrin #3 System Cookers; identified as unit 61-19; [326 IAC 6-1-2]
- (34) — One (1) Starch Storage Silo #2; identified as unit 61-20; [326 IAC 6-1-2]
- (35) — One (1) Starch Storage Silo #2 Receiver; identified as unit 61-21; [326 IAC 6-1-2]
- (36) — One (1) Dextrin #3 System Mixer; identified as unit 61-24; [326 IAC 6-1-2]
- (37) — One (1) Dextrin #3 System West Tank; identified as unit 61-25; [326 IAC 6-1-2]
- (38) — One (1) Dextrin #3 System East Tank; identified as unit 61-26; [326 IAC 6-1-2]
- (39) — One (1) CWS #8 Mill Receiver; identified as unit 63-1A; [326 IAC 6-1-2]
- (40) — One (1) CWS #7 Dryer Receiver; identified as unit 63-3; [326 IAC 6-1-2]
- (41) — One (1) CWS Packer; identified as unit 63-9; [326 IAC 6-1-2]
- (42) — One (1) Liquid Glue Bag Dump; identified as unit 63-12; [326 IAC 6-1-2]

- ~~(43) — One (1) CWS #9 and #10 Dryers Receiver; identified as unit 63-15; [326 IAC 6-1-2]~~
- ~~(44) — One (1) CWS #11, #12, and #13 Dryers; identified as unit 63-16; [326 IAC 6-1-2]~~
- ~~(45) — One (1) CWS Mill; identified as unit 63-17; [326 IAC 6-1-2]~~
- ~~(46) — One (1) CWS South Raw Material Dump; identified as unit 63-18; [326 IAC 6-1-2]~~
- ~~(47) — One (1) DSW Negative Receiver; identified as unit 63-20; [326 IAC 6-1-2]~~
- ~~(48) — Two (2) DSW Hoppers #17 and #18; identified as unit 71-2; [326 IAC 6-1-12]~~
- ~~(49) — One (1) Dextrin Packer; identified as unit 71-3; [326 IAC 6-1-2]~~
- ~~(50) — One (1) DSW Hopper #13; identified as unit 71-4A; [326 IAC 6-1-12]~~
- ~~(51) — One (1) DSW Hopper #1; identified as unit 71-5A; [326 IAC 6-1-12]~~
- ~~(52) — One (1) DSW Hopper #2; identified as unit 71-5B; [326 IAC 6-1-12]~~
- ~~(53) — One (1) DSW Hopper #3; identified as unit 71-5C; [326 IAC 6-1-12]~~
- ~~(54) — One (1) DSW Hopper #4; identified as unit 71-5D; [326 IAC 6-1-12]~~
- ~~(55) — One (1) DSW Hopper #5; identified as unit 71-5E; [326 IAC 6-1-12]~~
- ~~(56) — One (1) DSW Hopper #6; identified as unit 71-5F; [326 IAC 6-1-12]~~
- ~~(57) — One (1) DSW Hopper #7; identified as unit 71-5G; [326 IAC 6-1-12]~~
- ~~(58) — One (1) DSW Hopper #8; identified as unit 71-5H; [326 IAC 6-1-12]~~
- ~~(59) — One (1) DSW Hopper #9; identified as unit 71-5I; [326 IAC 6-1-12]~~
- ~~(60) — One (1) DSW Hopper #10; identified as unit 71-5J; [326 IAC 6-1-12]~~
- ~~(61) — One (1) DSW Hopper #11; identified as unit 71-5K; [326 IAC 6-1-12]~~
- ~~(62) — One (1) DSW Hopper #12; identified as unit 71-5L; [326 IAC 6-1-12]~~
- ~~(63) — One (1) DSW Bulk Car Loading; identified as unit 71-8; [326 IAC 6-1-2]~~
- ~~(64) — One (1) RSP Bulk Bag Packing; identified as unit 577-1; [326 IAC 6-1-2]~~
- ~~(65) — One (1) RSP Bulk Loading System A; identified as unit 577-4; [326 IAC 6-1-2]~~
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: operations M1 through M4 and RSP shop. [326 IAC 8-3-3]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Emission units or activities with potential uncontrolled PM10 emissions of less than 5 pounds per hour or 25 pounds per day.
 - (1) One (1) 152-1 Filter Receiver; [326 IAC 6-1-2]

- (2) One (1) 152-2 Mixer baghouse; [326 IAC 6-1-2]
- (3) One (1) 152-3 Starch Cooler Filter Receiver Bld 852; [326 IAC 6-1-2]
- (4) One (1) 152-4 Starch Mixer 2 Filter/Receiver Bld 852A; [326 IAC 6-1-2]
- (5) One (1) 152-5 Starch Mixer 2 Bld 852A; [326 IAC 6-1-2]
- (6) One (1) 152-6 Starch Storage Hopper; [326 IAC 6-1-2]
- (7) One (1) 128-3 Starch Hopper D/C; [326 IAC 6-1-2]
- (8) One (1) DSW Chemical Blender Bag Slitter, identified as unit 61-15; [326 IAC 6-1-2]
- (9) One (1) DSE Hopper #8, identified as unit 42-4; [326 IAC 6-1-12]
- (10) One (1) Dextrin #1 System Cooler Conveyor, identified as unit 61-3; [326 IAC 6-1-2]
- (11) One (1) Dextrin Flash Dryer, identified as unit 61-9; [326 IAC 6-1-12]
- (12) One (1) Dextrin #3 System Cooler, identified as unit 61-22; [326 IAC 6-1-2]
- (13) One (1) Dextrin #2 System Cooler Conveyor, identified as unit 61-23; [326 IAC 6-1-2]
- (14) One (1) CWS South Conveying, identified as unit 63-4; [326 IAC 6-1-2]**
- (15) One (1) CWS North Conveying, identified as unit 63-5; [326 IAC 6-1-2]**
- (16) One (1) DSE North Packer, identified as unit 42-1; [326 IAC 6-1-12]**
- (17) One (1) DSE South Packer, identified as unit 42-9; [326 IAC 6-1-2]**
- (18) One (1) sodium sulfate conveying system, identified as unit 40-1; [326 IAC 6-1-2]**
- (19) One (1) DSE Negative Receiver, identified as unit 42-6; [326 IAC 6-1-12]**
- (20) One (1) DSE Railcar Loading - East Track, identified as unit 42-11; [326 IAC 6-1-2]**
- (21) One (1) DSE Railcar Loading - West Track, identified as unit 42-12; [326 IAC 6-1-2]**
- (22) One (1) Dextrin #1 System Mixer, identified as unit 61-1; [326 IAC 6-1-2]**
- (23) One (1) Dextrin #1 System Cookers, identified as unit 61-2; [326 IAC 6-1-2]**
- (24) One (1) Dextrin #2 System Mixer, identified as unit 61-6; [326 IAC 6-1-12]**
- (25) Two (2) Dextrin #2 System East and West Tanks, identified as unit 61-7; [326 IAC 6-1-2]**

- (26) One (1) Starch Storage Silo #3 Receiver, identified as unit 61-11; [326 IAC 6-1-2]**
- (27) One (1) Starch Storage Silo #1 Receiver, identified as unit 61-12; [326 IAC 6-1-2]**
- (28) One (1) Starch Storage Silo #1, identified as unit 61-13; [326 IAC 6-1-2]**
- (29) One (1) Dextrin #1 System Packer, identified as unit 61-14; [326 IAC 6-1-12]**
- (30) One (1) DSW Chemical Blender Tank; identified as unit 61-14A; [326 IAC 6-1-12]**
- (31) One (1) Dextrin System Acidifiers; identified as unit 61-16; [326 IAC 6-1-2]**
- (32) One (1) Dextrin #2 System Cooler; identified as unit 61-18; [326 IAC 6-1-2]**
- (33) One (1) Dextrin #3 System Cookers; identified as unit 61-19; [326 IAC 6-1-2]**
- (34) One (1) Starch Storage Silo #2; identified as unit 61-20; [326 IAC 6-1-2]**
- (35) One (1) Starch Storage Silo #2 Receiver; identified as unit 61-21; [326 IAC 6-1-2]**
- (36) One (1) Dextrin #3 System Mixer; identified as unit 61-24; [326 IAC 6-1-2]**
- (37) One (1) Dextrin #3 System West Tank; identified as unit 61-25; [326 IAC 6-1-2]**
- (38) One (1) Dextrin #3 System East Tank; identified as unit 61-26; [326 IAC 6-1-2]**
- (39) One (1) Grain Elevator, identified as unit 56-2; [326 IAC 6-1-12]**
- (40) One (1) CWS #7 Dryer Receiver; identified as unit 63-3; [326 IAC 6-1-2]**
- (41) One (1) CWS Packer; identified as unit 63-9; [326 IAC 6-1-2]**
- (42) One (1) Liquid Glue Bag Dump; identified as unit 63-12; [326 IAC 6-1-2]**
- (43) One (1) CWS #9 and #10 Dryers Receiver; identified as unit 63-15; [326 IAC 6-1-2]**
- (44) One (1) CWS #11, #12, and #13 Dryers; identified as unit 63-16; [326 IAC 6-1-2]**
- (45) One (1) Starch Hopper D/C, identified as unit 128-3; [326 IAC 6-1-2]**
- (46) One (1) CWS South Raw Material Dump; identified as unit 63-18; [326 IAC 6-1-2]**
- (47) One (1) DSW Negative Receiver; identified as unit 63-20; [326 IAC 6-1-2]**
- (48) Two (2) DSW Hoppers #17 and #18; identified as unit 71-2; [326 IAC 6-1-12]**

- (49) One (1) Dextrin Packer; identified as unit 71-3; [326 IAC 6-1-2]**
- (50) One (1) DSW Hopper #13, identified as unit 71-4A; [326 IAC 6-1-12]**
- (51) One (1) DSW Hopper #1; identified as unit 71-5A; [326 IAC 6-1-12]**
- (52) One (1) DSW Hopper #2; identified as unit 71-5B; [326 IAC 6-1-12]**
- (53) One (1) DSW Hopper #3; identified as unit 71-5C; [326 IAC 6-1-12]**
- (54) One (1) DSW Hopper #4; identified as unit 71-5D; [326 IAC 6-1-12]**
- (55) One (1) DSW Hopper #5; identified as unit 71-5E; [326 IAC 6-1-12]**
- (56) One (1) DSW Hopper #6; identified as unit 71-5F; [326 IAC 6-1-12]**
- (57) One (1) DSW Hopper #7; identified as unit 71-5G; [326 IAC 6-1-12]**
- (58) One (1) DSW Hopper #8; identified as unit 71-5H; [326 IAC 6-1-12]**
- (59) One (1) DSW Hopper #9; identified as unit 71-5I; [326 IAC 6-1-12]**
- (60) One (1) DSW Hopper #10; identified as unit 71-5J; [326 IAC 6-1-12]**
- (61) One (1) DSW Hopper #11; identified as unit 71-5K; [326 IAC 6-1-12]**
- (62) One (1) DSW Hopper #12; identified as unit 71-5L; [326 IAC 6-1-12]**
- (63) One (1) DSW Bulk Car Loading; identified as unit 71-8; [326 IAC 6-1-2]**
- (64) One (1) RSP Bulk Bag Packing; identified as unit 577-1; [326 IAC 6-1-2]**
- (65) One (1) RSP Bulk Loading System A; identified as unit 577-4; [326 IAC 6-1-2]**
- (66) One (1) RSP Bulk Loading Fugitive Dust Collector; identified as unit 577-4A; [326 IAC 6-1-2]**
- (67) One (1) CWS Packing Hopper; identified as unit 578-2; [326 IAC 6-1-2]**
- ~~(68) One (1) CWS Bagging Line, identified as unit 578-1; [326 IAC 6-1-2]~~
- ~~(69) One (1) CWS Milling System, identified as unit 578-3; [326 IAC 6-1-2]~~
- ~~(70) One (1) CATO Cooling and Conveying, identified as unit 581-2; [326 IAC 6-1-2]~~
- ~~(71) One (1) RSP South Packing Line, identified as unit 577-3; [326 IAC 6-1-2]~~
- ~~(18) One (1) CWS South Conveying, identified as unit 63-4; [326 IAC 6-1-2]~~
- ~~(19) One (1) CWS North Conveying, identified as unit 63-5; [326 IAC 6-1-2]~~
- ~~(20) One (1) DSE North Packer, identified as unit 42-1; [326 IAC 6-1-12]~~
- ~~(21) One (1) DSE South Packer, identified as unit 42-9; [326 IAC 6-1-2]~~

SECTION D.3

FACILITY OPERATION CONDITIONS

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

(a) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.

~~(1) One (1) sodium sulfate conveying system, identified as unit 40-1; [326 IAC 6-1-2]~~

~~(2) One (1) DSE Hopper #9, identified as unit 42-3A; [326 IAC 6-1-12]~~

~~(3) One (1) DSE Hopper #10, identified as unit 42-3B; [326 IAC 6-1-12]~~

~~(4) One (1) DSE Hopper #11, identified as unit 42-3C; [326 IAC 6-1-12]~~

~~(5) One (1) DSE Hopper #12, identified as unit 42-3D; [326 IAC 6-1-12]~~

~~(6) One (1) DSE Hopper #13, identified as unit 42-3E; [326 IAC 6-1-12]~~

~~(7) One (1) DSE Hopper #14, identified as unit 42-3F; [326 IAC 6-1-12]~~

~~(8) One (1) DSE Negative Receiver, identified as unit 42-6; [326 IAC 6-1-12]~~

~~(9) One (1) DSE Hopper #2, identified as unit 42-7A; [326 IAC 6-1-12]~~

~~(10) One (1) DSE Hopper #4, identified as unit 42-7B; [326 IAC 6-1-12]~~

~~(11) One (1) DSE Hopper #6, identified as unit 42-7C; [326 IAC 6-1-12]~~

~~(12) One (1) DSE Hopper #1, identified as unit 42-8A; [326 IAC 6-1-2]~~

~~(13) One (1) DSE Hopper #3, identified as unit 42-8B; [326 IAC 6-1-2]~~

~~(14) One (1) DSE Hopper #5, identified as unit 42-8C; [326 IAC 6-1-2]~~

~~(15) One (1) DSE Hopper #7, identified as unit 42-8D; [326 IAC 6-1-2]~~

(14) One (1) CWS #8 Mill Receiver; identified as unit 63-1A; [326 IAC 6-1-2]

(15) One (1) CWS Mill; identified as unit 63-17; [326 IAC 6-1-2]

(16) One (1) Starch Filter/Receiver 2 Bld 852, identified as unit 152-7; [326 IAC 6-1-2]

(17) One (1) Starch Mixer 4 Bld 852A Filter Receiver, identified as unit 152-8; [326 IAC 6-1-2]

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

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

- (18) One (1) Starch Mixer 4 Bld 852A, identified as unit 152-9; [326 IAC 6-1-2]**
- (19) One (1) Starch Mixer 3 Bld 852A Filter Receiver, identified as unit 152-10; [326 IAC 6-1-2]**
- (20) One (1) Starch Mixer 3 Bld 852A, identified as unit 152-11; [326 IAC 6-1-2]**
- ~~(16) One (1) CWS Packing Hopper, identified as unit 578-2; [326 IAC 6-1-2]~~
- ~~(17) One (1) Starch Hopper D/C, identified as unit 128-3; [326 IAC 6-1-2]~~
- ~~(18) One (1) DSE Railcar Loading - East Track, identified as unit 42-11; [326 IAC 6-1-2]~~
- ~~(19) One (1) DSE Railcar Loading - West Track, identified as unit 42-12; [326 IAC 6-1-2]~~
- ~~(20) One (1) RSP Bulk Loading Fugitive Dust Collector, identified as unit 577-4A; [326 IAC 6-1-2]~~
- ~~(21) One (1) Grain Elevator, identified as unit 56-2; [326 IAC 6-1-12]~~
- ~~(22) One (1) Dextrin #1 System Mixer, identified as unit 61-1; [326 IAC 6-1-2]~~
- ~~(23) One (1) Dextrin #1 System Cookers, identified as unit 61-2; [326 IAC 6-1-2]~~
- ~~(24) One (1) Dextrin #2 System Mixer, identified as unit 61-6; [326 IAC 6-1-12]~~
- ~~(25) Two (2) Dextrin #2 System East and West Tanks, identified as unit 61-7; [326 IAC 6-1-2]~~
- ~~(26) One (1) Starch Storage Silo #3 Receiver, identified as unit 61-11; [326 IAC 6-1-2]~~
- ~~(27) One (1) Starch Storage Silo #1 Receiver, identified as unit 61-12; [326 IAC 6-1-2]~~
- ~~(28) One (1) Starch Storage Silo #1, identified as unit 61-13; [326 IAC 6-1-2]~~
- ~~(29) One (1) Dextrin #1 System Packer, identified as unit 61-14; [326 IAC 6-1-12]~~
- ~~(30) One (1) DSW Chemical Blender Tank; identified as unit 61-14A; [326 IAC 6-1-12]~~
- ~~(31) One (1) Dextrin System Acidifiers; identified as unit 61-16; [326 IAC 6-1-2]~~
- ~~(32) One (1) Dextrin #2 System Cooler; identified as unit 61-18; [326 IAC 6-1-2]~~
- ~~(33) One (1) Dextrin #3 System Cookers; identified as unit 61-19; [326 IAC 6-1-2]~~
- ~~(34) One (1) Starch Storage Silo #2; identified as unit 61-20; [326 IAC 6-1-2]~~

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

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

- (35) — One (1) Starch Storage Silo #2 Receiver; identified as unit 61-21; [326 IAC 6-1-2]
- (36) — One (1) Dextrin #3 System Mixer; identified as unit 61-24; [326 IAC 6-1-2]
- (37) — One (1) Dextrin #3 System West Tank; identified as unit 61-25; [326 IAC 6-1-2]
- (38) — One (1) Dextrin #3 System East Tank; identified as unit 61-26; [326 IAC 6-1-2]
- (39) — One (1) CWS #8 Mill Receiver; identified as unit 63-1A; [326 IAC 6-1-2]
- (40) — One (1) CWS #7 Dryer Receiver; identified as unit 63-3; [326 IAC 6-1-2]
- (41) — One (1) CWS Packer; identified as unit 63-9; [326 IAC 6-1-2]
- (42) — One (1) Liquid Glue Bag Dump; identified as unit 63-12; [326 IAC 6-1-2]
- (43) — One (1) CWS #9 and #10 Dryers Receiver; identified as unit 63-15; [326 IAC 6-1-2]
- (44) — One (1) CWS #11, #12, and #13 Dryers; identified as unit 63-16; [326 IAC 6-1-2]
- (45) — One (1) CWS Mill; identified as unit 63-17; [326 IAC 6-1-2]
- (46) — One (1) CWS South Raw Material Dump; identified as unit 63-18; [326 IAC 6-1-2]
- (47) — One (1) DSW Negative Receiver; identified as unit 63-20; [326 IAC 6-1-2]
- (48) — Two (2) DSW Hoppers #17 and #18; identified as unit 71-2; [326 IAC 6-1-12]
- (49) — One (1) Dextrin Packer; identified as unit 71-3; [326 IAC 6-1-2]
- (50) — One (1) DSW Hopper #13; identified as unit 71-4A; [326 IAC 6-1-12]
- (51) — One (1) DSW Hopper #1; identified as unit 71-5A; [326 IAC 6-1-12]
- (52) — One (1) DSW Hopper #2; identified as unit 71-5B; [326 IAC 6-1-12]
- (53) — One (1) DSW Hopper #3; identified as unit 71-5C; [326 IAC 6-1-12]
- (54) — One (1) DSW Hopper #4; identified as unit 71-5D; [326 IAC 6-1-12]
- (55) — One (1) DSW Hopper #5; identified as unit 71-5E; [326 IAC 6-1-12]
- (56) — One (1) DSW Hopper #6; identified as unit 71-5F; [326 IAC 6-1-12]
- (57) — One (1) DSW Hopper #7; identified as unit 71-5G; [326 IAC 6-1-12]

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

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

- ~~(58) — One (1) DSW Hopper #8; identified as unit 71-5I; [326 IAC 6-1-12]~~
- ~~(59) — One (1) DSW Hopper #9; identified as unit 71-5I; [326 IAC 6-1-12]~~
- ~~(60) — One (1) DSW Hopper #10; identified as unit 71-5J; [326 IAC 6-1-12]~~
- ~~(61) — One (1) DSW Hopper #11; identified as unit 71-5K; [326 IAC 6-1-12]~~
- ~~(62) — One (1) DSW Hopper #12; identified as unit 71-5L; [326 IAC 6-1-12]~~
- ~~(63) — One (1) DSW Bulk Car Loading; identified as unit 71-8; [326 IAC 6-1-2]~~
- ~~(64) — One (1) RSP Bulk Bag Packing; identified as unit 577-1; [326 IAC 6-1-2]~~
- ~~(65) — One (1) RSP Bulk Loading System A; identified as unit 577-4; [326 IAC 6-1-2]~~
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: operations M1 through M4 and RSP shop. [326 IAC 8-3-3]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Emission units or activities with potential uncontrolled PM10 emissions of less than 5 pounds per hour or 25 pounds per day.
 - (1) One (1) 152-1 Filter Receiver; [326 IAC 6-1-2]
 - (2) One (1) 152-2 Mixer baghouse; [326 IAC 6-1-2]
 - (3) One (1) 152-3 Starch Cooler Filter Receiver Bld 852; [326 IAC 6-1-2]
 - (4) One (1) 152-4 Starch Mixer 2 Filter/Receiver Bld 852A; [326 IAC 6-1-2]
 - (5) One (1) 152-5 Starch Mixer 2 Bld 852A; [326 IAC 6-1-2]
 - (6) One (1) 152-6 Starch Storage Hopper; [326 IAC 6-1-2]
 - (7) One (1) 128-3 Starch Hopper D/C; [326 IAC 6-1-2]
 - (8) One (1) DSW Chemical Blender Bag Slitter, identified as unit 61-15; [326 IAC 6-1-2]
 - (9) One (1) DSE Hopper #8, identified as unit 42-4; [326 IAC 6-1-12]
 - (10) One (1) Dextrin #1 System Cooler Conveyor, identified as unit 61-3; [326 IAC 6-1-2]
 - (11) One (1) Dextrin Flash Dryer, identified as unit 61-9; [326 IAC 6-1-12]
 - (12) One (1) Dextrin #3 System Cooler, identified as unit 61-22; [326 IAC 6-1-2]

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

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

- (13) One (1) Dextrin #2 System Cooler Conveyor, identified as unit 61-23; [326 IAC 6-1-2]
- (14) One (1) CWS South Conveying, identified as unit 63-4; [326 IAC 6-1-2]
- (15) One (1) CWS North Conveying, identified as unit 63-5; [326 IAC 6-1-2]
- (16) One (1) DSE North Packer, identified as unit 42-1; [326 IAC 6-1-12]
- (17) One (1) DSE South Packer, identified as unit 42-9; [326 IAC 6-1-2]
- (18) One (1) sodium sulfate conveying system, identified as unit 40-1; [326 IAC 6-1-2]
- (19) One (1) DSE Negative Receiver, identified as unit 42-6; [326 IAC 6-1-12]
- (20) One (1) DSE Railcar Loading - East Track, identified as unit 42-11; [326 IAC 6-1-2]
- (21) One (1) DSE Railcar Loading - West Track, identified as unit 42-12; [326 IAC 6-1-2]
- (22) One (1) Dextrin #1 System Mixer, identified as unit 61-1; [326 IAC 6-1-2]
- (23) One (1) Dextrin #1 System Cookers, identified as unit 61-2; [326 IAC 6-1-2]
- (24) One (1) Dextrin #2 System Mixer, identified as unit 61-6; [326 IAC 6-1-12]
- (25) Two (2) Dextrin #2 System East and West Tanks, identified as unit 61-7; [326 IAC 6-1-2]
- (26) One (1) Starch Storage Silo #3 Receiver, identified as unit 61-11; [326 IAC 6-1-2]
- (27) One (1) Starch Storage Silo #1 Receiver, identified as unit 61-12; [326 IAC 6-1-2]
- (28) One (1) Starch Storage Silo #1, identified as unit 61-13; [326 IAC 6-1-2]
- (29) One (1) Dextrin #1 System Packer, identified as unit 61-14; [326 IAC 6-1-12]
- (30) One (1) DSW Chemical Blender Tank; identified as unit 61-14A; [326 IAC 6-1-12]
- (31) One (1) Dextrin System Acidifiers; identified as unit 61-16; [326 IAC 6-1-2]
- (32) One (1) Dextrin #2 System Cooler; identified as unit 61-18; [326 IAC 6-1-2]
- (33) One (1) Dextrin #3 System Cookers; identified as unit 61-19; [326 IAC 6-1-2]
- (34) One (1) Starch Storage Silo #2; identified as unit 61-20; [326 IAC 6-1-2]
- (35) One (1) Starch Storage Silo #2 Receiver; identified as unit 61-21; [326 IAC 6-1-2]

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

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

- (36) One (1) Dextrin #3 System Mixer; identified as unit 61-24; [326 IAC 6-1-2]**
- (37) One (1) Dextrin #3 System West Tank; identified as unit 61-25; [326 IAC 6-1-2]**
- (38) One (1) Dextrin #3 System East Tank; identified as unit 61-26; [326 IAC 6-1-2]**
- (39) One (1) Grain Elevator, identified as unit 56-2; [326 IAC 6-1-12]**
- (40) One (1) CWS #7 Dryer Receiver; identified as unit 63-3; [326 IAC 6-1-2]**
- (41) One (1) CWS Packer; identified as unit 63-9; [326 IAC 6-1-2]**
- (42) One (1) Liquid Glue Bag Dump; identified as unit 63-12; [326 IAC 6-1-2]**
- (43) One (1) CWS #9 and #10 Dryers Receiver; identified as unit 63-15; [326 IAC 6-1-2]**
- (44) One (1) CWS #11, #12, and #13 Dryers; identified as unit 63-16; [326 IAC 6-1-2]**
- (45) One (1) Starch Hopper D/C, identified as unit 128-3; [326 IAC 6-1-2]**
- (46) One (1) CWS South Raw Material Dump; identified as unit 63-18; [326 IAC 6-1-2]**
- (47) One (1) DSW Negative Receiver; identified as unit 63-20; [326 IAC 6-1-2]**
- (48) Two (2) DSW Hoppers #17 and #18; identified as unit 71-2; [326 IAC 6-1-12]**
- (49) One (1) Dextrin Packer; identified as unit 71-3; [326 IAC 6-1-2]**
- (50) One (1) DSW Hopper #13, identified as unit 71-4A; [326 IAC 6-1-12]**
- (51) One (1) DSW Hopper #1; identified as unit 71-5A; [326 IAC 6-1-12]**
- (52) One (1) DSW Hopper #2; identified as unit 71-5B; [326 IAC 6-1-12]**
- (53) One (1) DSW Hopper #3; identified as unit 71-5C; [326 IAC 6-1-12]**
- (54) One (1) DSW Hopper #4; identified as unit 71-5D; [326 IAC 6-1-12]**
- (55) One (1) DSW Hopper #5; identified as unit 71-5E; [326 IAC 6-1-12]**
- (56) One (1) DSW Hopper #6; identified as unit 71-5F; [326 IAC 6-1-12]**
- (57) One (1) DSW Hopper #7; identified as unit 71-5G; [326 IAC 6-1-12]**
- (58) One (1) DSW Hopper #8; identified as unit 71-5H; [326 IAC 6-1-12]**
- (59) One (1) DSW Hopper #9; identified as unit 71-5I; [326 IAC 6-1-12]**

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

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

- (60) One (1) DSW Hopper #10; identified as unit 71-5J; [326 IAC 6-1-12]
- (61) One (1) DSW Hopper #11; identified as unit 71-5K; [326 IAC 6-1-12]
- (62) One (1) DSW Hopper #12; identified as unit 71-5L; [326 IAC 6-1-12]
- (63) One (1) DSW Bulk Car Loading; identified as unit 71-8; [326 IAC 6-1-2]
- (64) One (1) RSP Bulk Bag Packing; identified as unit 577-1; [326 IAC 6-1-2]
- (65) One (1) RSP Bulk Loading System A; identified as unit 577-4; [326 IAC 6-1-2]
- (66) One (1) RSP Bulk Loading Fugitive Dust Collector; identified as unit 577-4A; [326 IAC 6-1-2]
- (67) One (1) CWS Packing Hopper; identified as unit 578-2; [326 IAC 6-1-2]
- (14 68) One (1) CWS Bagging Line, identified as unit 578-1; [326 IAC 6-1-2]
- (15 69) One (1) CWS Milling System, identified as unit 578-3; [326 IAC 6-1-2]
- (16 70) One (1) CATO Cooling and Conveying, identified as unit 581-2; [326 IAC 6-1-2]
- (17 71) One (1) RSP South Packing Line, identified as unit 577-3; [326 IAC 6-1-2]
- ~~(18) One (1) CWS South Conveying, identified as unit 63-4; [326 IAC 6-1-2]~~
- ~~(19) One (1) CWS North Conveying, identified as unit 63-5; [326 IAC 6-1-2]~~
- ~~(20) One (1) DSE North Packer, identified as unit 42-1; [326 IAC 6-1-12]~~
- ~~(21) One (1) DSE South Packer, identified as unit 42-9; [326 IAC 6-1-2]~~

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

Comment 6:

National Starch has operated the scrubber controlling emissions from unit 5549-28 for over a year. Examination of its normal operation indicates that the normal range is between 1.0 and 12.0 inches of water. Please change Condition D.1.8(c) accordingly.

Response to Comment 6:

The following change was made to the permit to correct the pressure drop range across the scrubber:

D.1.8 Parametric Monitoring for Scrubbers

- (c) The Permittee shall monitor the total static pressure drop across the scrubber at least once daily from the scrubber controlling emissions from unit 5549-28 when 5549-28 is in operation. When, for any one reading, the pressure drop across the scrubber is outside the normal range of ~~6-0~~**1.0** and 12.0 inches of water, or a range that indicates proper

operation of the unit, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

Comment 7:

It is the understanding of National Starch that, pursuant to 326 IAC 1-6-2(a)(5), if a malfunction of any scrubber occurs, then it must shut down the respective corresponding operation. As a result, it is in National Starch's best economic interest to repair any malfunctioned scrubber as expeditiously as possible so that the operation can be restarted as soon as possible. As a result, please remove Condition D.1.10(b), which requires corrective actions following the observance of scrubber malfunction.

Response to Comment 7:

Note that 326 IAC 2-7-16, not 326 IAC 1-6-2(a)(5) (Records; Notice of Malfunction), applies to Part 70 sources. The applicable provisions (326 IAC 2-7-16) do not necessarily require shut down of the operation. Since Condition D.1.10(b) directs the Permittee to expeditiously address any potential problems found during an inspection in order to prevent a malfunction, it has been moved to Condition D.1.9. The following changes were made to the permit in response to this comment:

D.1.9 Scrubber Inspections

- (a) An inspection of each scrubber, controlling emissions from units 5502-1A through 5502-1C, 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1, 5549-2, and 575-2, shall be performed each calendar quarter. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.
- (b) An inspection of the scrubber controlling emissions from 5549-28 shall be performed semi-annually. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.
- (c) **Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.**

D.1.10 Scrubber Malfunction

In the event that a scrubber malfunction has been observed: **, the affected unit will be shut down immediately in accordance with safe operating procedures until the failed unit has been repaired or the appropriate components replaced.**

- ~~(a) The affected unit will be shut down immediately in accordance with safe operating procedures until the failed unit has been repaired or the appropriate components replaced.~~
- ~~(b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.~~

Comment 8:

Pursuant to M 097-00042-99-01, issued February 25, 1999, the PM/PM10 emissions from unit 5503-6 are limited to 1.43 lb/hr. Condition D.2.1(a) states that the PM/PM10 emissions from unit 5503-6 are limited to 0.26 lb/hr and references that approval. Please correct the emission limitation in Condition D.2.1(a) for unit 5503-6.

Response to Comment 8:

At no point in M 097-00042-99-01, issued February 25, 1999, is unit 5503-6 specifically limited to 1.43 lb/hr PM/PM10. However, Appendix A of M 097-00042-99-01, issued February 25, 1999, indicates that the 1.148 ton/yr limit on 5503-6 assumed only 1,602 hours of operation per year. As a result, the following changes have been made to the permit in response to this comment:

D.2.1 Prevention of Significant Deterioration: PM and PM10 Limitations [40 CFR 52.21] [326 IAC 2-2]

(a) Pursuant to CP 097-0042-97-01, issued March 24, 1997, M 097-00042-99-01, issued February 25, 1999, MSM 097-11764-00042, issued March 10, 2000, and SSM 097-11362-00042, issued August 31, 2000, the following facilities are limited as indicated in the table below:

Unit/ Stack ID	PM/PM ₁₀ Limit (gr/dscf)	PM/PM ₁₀ Limit (lb/hr)	PM/PM ₁₀ Limit (ton/yr)
...			
5503-2 through 5503-5	0.01	0.99	3.11
5503-6 (stack 5503-6)	0.01	0.26 1.43	1.148
...			

(c) The input of starch to unit 5549-13 shall not exceed 14,010 tons per twelve consecutive month period with compliance determined at the end of each month. The emission rate shall not exceed 0.61 lb PM/PM10 per ton of starch. Compliance with this limit is equivalent to PM/PM10 emissions of less than 4.29 tons per year.

(d) Facility 5503-6 shall not operate more that 1,602 hours per twelve consecutive month period with compliance determined at the end of each month.

Compliance with these limits will render the requirements of 40 CFR 52.21 and 326 IAC 2-2 (Prevention Significant Deterioration) not applicable.

D.2.12 Record Keeping Requirements

(a) To document compliance with Condition D.2.1(d c), the Permittee shall maintain monthly records of the input of starch for unit 5549-13.

(b) To document compliance with Condition D.2.1(d), the Permittee shall maintain records of the operating schedule for facility 5503-6.

(b c) To document compliance with Condition D.2.6, the Permittee shall maintain records of the once per shift visible emission notations of the stack exhaust.

(e d) To document compliance with Condition D.2.7, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation.

- (d e) To document compliance with Conditions D.2.8 and D.2.10, the Permittee shall maintain records of the results of the inspections.
- (e f) To document compliance with Condition D.2.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (f g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

The records used to document compliance with Conditions D.1.1 are sufficient to document compliance with Conditions D.2.1(b) and D.2.1(c). See Condition D.1.13.

D.2.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1(c), (b), and (d) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(new reporting form)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 Compliance Data Section
 and
 City of Indianapolis
 Office of Environmental Services**

Part 70 Quarterly Report

Source Name: National Starch and Chemical Company
 Source Address: 1515 South Drover Street, Indianapolis, IN 46221
 Mailing Address: 1515 South Drover Street, Indianapolis, IN 46221
 Part 70 Permit No.: T097-7714-00042
 Facility: 5503-6
 Parameter: Hours of operation
 Limit: Facility 5503-6 shall not operate more that 1,602 hours per twelve consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Operating hours	Operating hours	Operating hours
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			

Month 3			
---------	--	--	--

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Comment 9:

5503-6 and 5502-6 are subject to the requirements of 326 IAC 6-1-2; however they are not listed in Condition D.2.2. Please change Conditions D.2.2, D.2.4, and D.2.5(b) accordingly.

Response to Comment 9:

The following changes were made to the permit to clarify that units 5503-6 and 5502-6 are subject to the requirements of 326 IAC 6-1-2:

D.2.2 Particulate Matter [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the particulate matter emissions from facilities 71-7, 577-2, 54-1, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-10, 5549-12, 5549-13, 5549-14, 5502-3, 5502-4, 5502-5, **5502-6**, 5503-1, 5503-2 through 5503-5, **5503-6**, the spray agglomeration process (consisting of units 5549-16 through 5549-21, and 5549-26), 71-9, 5552-1, and 5552-2 shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

Compliance with the limits in Condition D.2.1 for facilities 71-7, 577-2, 54-1, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-10, 5549-12, 5549-13, 5549-14, 5502-3, 5502-4, 5502-5, **5502-6**, 5503-1, 5503-2 through 5503-5, **5503-6**, the spray agglomeration process (consisting of units 5549-16 through 5549-21, and 5549-26), 71-9, 5552-1, and 5552-2 will ensure compliance with the requirements of 326 IAC 6-1-2.

D.2.4 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 facilities 577-2, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-14, 5502-3, 5502-4, 5502-5, **5502-6**, 5503-1, 5503-2 through 5503-5, **5503-6**, 5549-16 through 5549-21, 5549-26, 71-9, 5552-1, and 5552-2 and their respective control devices.

D.2.5 Particulate Control

- (b) In order to comply with Conditions D.2.1 and D.2.2, the high efficiency cyclones for particulate control shall be in operation and control particulate emissions from ~~facility~~ **facilities 5502-5 and 5502-6** at all times ~~that facility is the respective facilities are~~ **facilities are** in operation.

Comment 10:

The emissions from facility 5502-5 are controlled by a cyclone, not a baghouse. Please correct Condition D.2.7(a) accordingly.

Response to Comment 10:

The following changes were made to the permit:

D.2.7 Parametric Monitoring for Baghouses

- (a) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with facilities 577-2, 5549-16 through 5549-21, 5549-26, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-14, 5502-3, 5502-4, 5502-5, 5503-1, 5503-2 through 5503-5, 71-9, 5552-1, and 5552-2 at least once per shift when the respective facilities are in operation. When, for any one reading, the pressure drop across the baghouses are outside the normal range of 0.0 and 6.0 inches of water or a range established during the last stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

D.2.10 Cyclone Inspections

An inspection shall be performed each calendar quarter of the cyclone controlling the emissions from facilities 5502-5 and 5502-6. Inspections required by this condition shall not be performed in consecutive months.

Comment 11:

National Starch proposes that an additional condition be inserted as Condition D.1.7(f). This condition is necessary to allow for bakeout periods of the RTO (which is used for particulate and opacity control) or equivalent device. These periods are needed periodically (though infrequently) for proper operation of the control device. National Starch is essentially requesting a temporary alternative opacity limit for the infrequent bakeout periods since visible emissions during such periods could result in elevated, short term, opacity observations that exceed 30% opacity. Note that since the installation of the RTO in 1999, it has been necessary to bakeout the unit only once. The need to bakeout the RTO is based on the pressure drop across the unit. The following language is proposed for Condition D.1.7(f):

- (f) Visible emissions notations of exhaust from stack 5502-7 are not required during scheduled, routine bakeout events involving the natural gas-fired Regenerative Thermal Oxidizer (RTO), or equivalent control device, used for particulate and opacity control, provided that the Permittee meets the following conditions:
- (1) The Permittee notifies the OAQ and OES at least twenty-four (24) hours in advance of a bakeout event;
 - (2) The Permittee follows specific bakeout procedures outlined in the Preventive Maintenance Plan (PMP), thereby minimizing emissions during the bakeout event. Deviations from the procedures in the PMP during bakeout events will require that changes are made to the PMP;
 - (3) The Permittee completes bakeout events in an expeditious manner;
 - (4) The Permittee documents that bakeout event do not exceed three percent (3%) of the annual operating time of the RTO, or equivalent device; and

- (5) The Permittee keeps records of the date and duration of each bakeout event.

Provided that these conditions are met, the Permittee is allowed a temporary alternative opacity limitation during bakeout events such that opacity shall not exceed sixty percent (60%) for more than a cumulative total of 14 hours in any twenty-four (24) period.

Response to Comment 11:

In order to request a temporary alternative opacity limit (TAOL), National Starch must comply with requirements of 326 IAC 5-1-3. Pursuant to 326 IAC 5-1-3(d), National Starch must demonstrate that the TAOL is needed and justifiable, and the limited information provided during the public comment period does not sufficiently demonstrate or justify the need for a TAOL. In addition, sources requesting a TAOL (that are subject to 326 IAC 2-7) must include a petition for a SIP revision with the initial permit application, permit revision application, or permit renewal application. IDEM has not received any such petition.

Comment 12:

Visible emission notations are difficult to obtain during adverse weather conditions. Please change Condition D.1.7(a) and D.2.6(a) from "... during normal daylight operations when the respective facilities are in operation" to "... during normal daylight operations when the respective facilities are in operation and when weather conditions allow."

Response to Comment 12:

National Starch should be able to perform visible emissions notations each day of operation of the facility. Since Method 9 opacity readings are not required, the observer should be able to determine whether the visible emissions are "normal" or "abnormal" regardless of the weather.

As Condition D.1.7 states, 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. This training does not need to include the training to become a certified opacity reader nor does the training need to be done by a certified opacity reader. The purpose of specifying that a trained employee perform the visible emissions notations is to make sure that the employee would know the difference between "normal" and "abnormal" visible emissions from the particular process. The OAQ believes that the definition of a trained employee is clear in the permit and such an employee is capable of making visible emissions observations regardless of weather.

No changes have been made to the permit in response to this comment.

Comment 13:

Conditions D.1.7 and D.2.6 state that the Permittee shall comply with the provisions of the Compliance Response Plan when abnormal visible emission notations are observed and that only failure to take the necessary response step is considered a violation/deviation of this permit. However, those conditions do not clarify that the notation of abnormal visible emissions is not a deviation from the permit. As a result, please modify Conditions D.1.7(a) and D.2.6(a) to clarify that the notation of abnormal visible emissions is not a deviation from the permit.

Response to Comment 13:

The following changes have been made to the permit:

D.1.7 Visible Emissions Notations

- (a) Visible emission notations of exhaust from stacks 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1,

5549-2, 575-2, 5502-7, and 5549-28 shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. **A notation of abnormal visible emissions is not a deviation from this permit.**

D.2.6 Visible Emissions Notations

- (a) Visible emission notations of the exhaust from stacks 577-2, 5549-16 through 5549-21, 5549-26, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-14, 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2, 5503-6, 71-9, 5552-1, and 5552-2 shall be performed once per shift during normal daylight operations when the respective facilities are in operation. A trained employee shall record whether emissions are normal or abnormal. **A notation of abnormal visible emissions is not a deviation from this permit.**

Comment 14:

Condition D.1.7 requires visible emission notations from stacks 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1, 5549-2, 575-2, and 5502-7 to be performed once per shift during normal daylight operations. The frequency of observation has been increased from the once per day schedule as required by the construction permits for these facilities. As stated in the TSD, IDEM believes that visible emissions notations on a once per shift basis will better demonstrate continuous compliance with the permit requirements. National Starch believes that the once per shift observation frequency is overly burdensome for units and control devices that are covered by a Preventive Maintenance Plan as required by Condition D.1.5. Therefore, National Starch proposes a reduced observation frequency schedule for units that regularly demonstrate good performance and have infrequent observance of abnormal emissions. National Starch requests that the following language be placed into Condition D.1.7 of the permit:

“The visible emission notation frequency may be reduced to once per day if no abnormal emissions are observed for a period of one month or more. If abnormal emissions are detected, the once per shift visible emission notation frequency will be resumed.”

Accordingly, National Starch proposes that Condition D.1.11(h) be revised as follows:

“To document compliance with Condition D.1.7, the Permittee shall maintain records of the once per shift (or once per day, if applicable) visible emission notations of the stack exhaust.”

Response to Comment 14:

Visible emissions notations are used to determine compliance with 326 IAC 5-1, 326 IAC 6, and render the requirements of 326 IAC 2-2 not applicable. This monitoring requirement is designed: 1) as a trigger for the source to perform some corrective action on the facility if visible emissions are abnormal, and 2) to ensure continuous compliance with the respective emission limitations. IDEM believes that once per shift notations are reasonable, adequate, and necessary to demonstrate continuous compliance with permit requirements. In addition, scrubber failure can occur suddenly and during any shift. Once per shift, as opposed to once per day, monitoring can minimize lag time in addressing control failure. National Starch has not provided sufficient information to demonstrate that daily visible emission notations will ensure continuous compliance. Therefore, when more than one shift occurs during daylight hours, visible emissions notations shall be made during each shift.

No changes were made to the permit as a result of this comment.

Comment 15:

Condition D.2.6 requires visible emission notations from various stacks at the plant to be

performed once per shift during normal daylight operations. In addition, Condition D.2.7 requires total static pressure drop across the respective baghouses at the plant to be recorded at least once per shift during unit operation. The frequency of recording has been increased from the once per day schedule as required by the construction permits for these facilities. As stated in the TSD, IDEM believes that visible emissions notations and parametric monitoring on a once per shift basis will better demonstrate continuous compliance with the permit requirements.

National Starch believes that the requirements to monitor visible emissions as well as pressure drop across the baghouses on a once per shift basis is duplicative and overly burdensome. National Starch maintains that the initial and primary indicator of a bag failure would occur during a visible emissions notation since the facilities process "white" starch. In addition, these units are covered by a Preventive Maintenance Plan to minimize the occurrence of bag failure as required by Condition D.2.4. Therefore, National Starch proposes that the OAQ and OES remove all pressure drop monitoring of Condition D.2.7 and the corresponding recordkeeping requirements in Condition D.2.15(c).

National Starch is currently doing daily static pressure drop reading on stacks 5549-20 and 5549-21. During an entire week of operation, the pressure drop across these units will not vary more than 0.6 inches of water. This is typical of most baghouses at National Starch.

In addition, many of the baghouses/cyclones of Section D.2 of the draft permit are integral to the process and recover valuable product. This equipment is maintained and operated to achieve high recovery efficiency rates in order to increase product recovery. National Starch proposes that the visible emissions notation frequency for these units be reduced to once per month based on the inherent process value of the baghouses and the economic incentives tied to maintaining well functioning equipment through a preventative maintenance program.

Facilities 5549-14 and 5549-20 have controlled potential emissions less than 25 lb/day and 4.56 tpy, each. National Starch proposes that the frequency of visible emissions notations be reduced to a once per week frequency for these small particulate-emitting units.

National Starch proposes to reduce the visible emissions observation frequency schedule for the remaining non-integral units of Section D.2 if they regularly demonstrate good performance and have infrequent observances of abnormal emissions. National Starch requests that the following language be placed into Condition D.2.6(a):

"The visible emission notations frequency of facility 5549-21 may be reduced to once per day if no abnormal emissions are observed for a period of one month or more. If abnormal emissions should be detected, the once per shift visible emission notation frequency will be resumed."

National Starch also requests that the baghouse inspection frequency be reduced from a quarterly basis to a semi-annual basis in Condition D.2.8. As stated above, many of these baghouses are integral to the process and are covered by a Preventative Maintenance Plan. In addition, the supplier of the bags has warned that the bags are easily damaged during removal once they have been put into service. Therefore, any inspection involving removal of the bags is not recommended. National Starch maintains that a semi-annual inspection of the baghouse internals on the clean side along with the visible emissions monitoring will assure good working order of the baghouse.

Response to Comment 15:

National Starch has provided information on their baghouses that supports once per day monitoring. This information includes: the air stream/exhaust temperature is less than 120 °F, and the bagfilter captures nearly 100% of the particulate emissions generated by the respective facility.

Changes have also been made to reflect that: 1) a number of facilities utilize integral baghouses, and 2) the correct pressure drop range for the baghouses is between 3.0 and 6.0 inches of water.

As a result, the following changes have been made to the permit:

D.2.6 Visible Emissions Notations

- (a) ~~Visible emission notations of the exhaust from stacks 577-2, 5549-16 through 5549-21, 5549-26, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-14, 5502-3, 5502-4, 5502-5, 5502-6, 5503-1, 5503-2, 5503-5, 5503-6, and 5549-13-71-9, 5552-1, and 5552-2 shall be performed once per shift during normal daylight operations when the respective facilities are in operation. A trained employee shall record whether emissions are normal or abnormal.~~
- (b) **Visible emission notations of the exhaust from stacks 71-9, 5552-1, 5552-2, 5503-2, 5503-3, 5503-4, 577-2, 5503-1, 5502-4, 5502-3, 577-5 through 577-10, 5549-7 through 5549-10, 5549-12, 5549-14, 5549-16 through 5549-21, and 5549-26 shall be performed once per day during normal daylight operations when the respective facilities are in operation. A trained employee shall record whether emissions are normal or abnormal.**
- (b c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e f) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

D.2.7 Parametric Monitoring for Baghouses

- (a) ~~The Permittee shall record the total static pressure drop across the baghouses used in conjunction with facilities 5503-5, 5503-6, and 5549-13 577-2, 5549-16 through 5549-20, 5549-21, 5549-26, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-13, 5549-14, 5502-3, 5502-4, 5502-5, 5503-1, 5503-2 through 5503-5, 71-9, 5552-1, and 5552-2 at least once per shift when the respective facilities are in operation. When, for any one reading, the pressure drop across the baghouses are outside the normal range of 0.0 and 6.0 inches of water or a range established during the last stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.~~
- (b) **The Permittee shall record the total static pressure drop across the baghouses used in conjunction with facilities 577-2, 5549-20, 5549-21, 5503-2, 5503-3, and 5503-4 at least once per day when the respective facilities are in operation.**

- (c) **When, for any one reading, the pressure drop across the baghouses are outside the normal range of 3.0 and 6.0 inches of water or a range established during the last stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.**
- (b d) The instrument used for **measuring** the pressure drop shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated, maintained, and operated according to the manufacturer's specifications.

D.2.8 Baghouse Inspections

~~An inspection shall be performed each calendar quarter of all bags controlling the particulate emissions from facilities 577-2, 577-5 through 577-10, 5549-3, 5549-4, 5549-7 through 5549-14, 5502-3, 5502-4, 5502-5, 5503-1, 5503-2 through 5503-5, 5549-16 through 5549-21, 5549-26, 71-9, 5552-1, and 5552-2. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

- (a) **An inspection of all bags controlling particulate emissions from facilities 577-2, 5549-20, 5549-21, 5503-2, 5503-3, and 5503-4 shall be performed at least once per calendar year. Inspections required by this condition shall not be performed in consecutive months. Inspections shall also be performed whenever the respective baghouse is out of service for more than 24 consecutive hours. All defective bags shall be replaced.**
- (b) **An inspection shall be performed each calendar quarter of all bags controlling the particulate emissions from facilities 5503-5, 5503-6, and 5549-13. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.**

Comment 16:

National Starch requests that the citation listed next to each insignificant activity in Section A.3 and D.3 be deleted. Regulatory applicability for these insignificant unit is not limited to the citations listed.

Response to Comment 16:

The 326 IAC citations are included next to each specifically regulated insignificant activity to clarify which 326 IAC rule specifically apply to those insignificant activities. Nowhere in the permit is there a statement that implies, either directly or implicitly, that the inclusion of the citations indicates that regulatory applicability for those units is limited to those rules. Furthermore, Section D.3 specifically states "(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)"

No changes have been made to the permit in response to this comment.

Comment 17:

Please include the 326 IAC insignificant citation next to each category of insignificant activities listed in the permit.

Response to Comment 17:

The following changes were made to Sections A.3 and D.3: (See the response to Comment No. 5 for the full showing of all changes made to A.3 and D.3.)

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) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations: **[326 IAC 2-7-1(21)(G)(xxiii)]**

...
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: operations M1 through M4 and RSP shop. **[326 IAC 2-7-1(21)(G)(vi)(CC)]**
[326 IAC 8-3-3]
- (c) Paved and unpaved roads and parking lots with public access. **[326 IAC 2-7-1(21)(G)(xiii)]** [326 IAC 6-4]
- (d) Emission units or activities with potential uncontrolled PM10 emissions of less than 5 pounds per hour or 25 pounds per day: **[326 IAC 2-7-1(21)(B)]**

...

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations: **[326 IAC 2-7-1(21)(G)(xxiii)]**

...
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: operations M1 through M4 and RSP shop. **[326 IAC 2-7-1(21)(G)(vi)(CC)]** [326 IAC 8-3-3]
- (c) Paved and unpaved roads and parking lots with public access. **[326 IAC 2-7-1(21)(G)(xiii)]** [326 IAC 6-4]
- (d) Emission units or activities with potential uncontrolled PM10 emissions of less than 5 pounds per hour or 25 pounds per day: **[326 IAC 2-7-1(21)(B)]**

...

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes.

1. Condition B.8, Compliance with Permit Conditions, has been moved to the front page of the permit.

~~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, 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) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.~~
- ~~(c) 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.~~
- ~~(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.~~

(front page of permit)

**PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY
and
City of Indianapolis
Office of Environmental Services**

**National Starch and Chemical Company
1515 South Drover Street
Indianapolis, IN 46221**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination,

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

This permit also addresses certain New Source Review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

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.

2. The notification requirement in C.15 has been modified to apply only to situations where the emissions unit will continue to operate for an extended time while the compliance monitoring parameter is out of range. This provides IDEM, OAQ and opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with applicable requirements.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-7-5] [326 IAC 2-7-6]

...

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

...

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

3. To be consistent with current IDEM, OAQ language, Conditions D.1.7, D.1.8 and D.1.10 have been updated as shown below:

D.1.7 Visible Emissions Notations

...

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

D.1.8 Parametric Monitoring for Scrubbers

- (a) The Permittee shall monitor the pH and flow rate of the of the liquid through the nozzles

of the scrubber at least once per week of the scrubber used to control particulate and SO₂ emissions from units 5502-1A through 5502-1C. When, for any one reading, the pH of the liquid used in the scrubber is less than 5.5, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. When, for any one reading, the flow rate through the nozzles of the scrubber is outside the range of 110 to 145 gallons per minute, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pH or flow rate reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

- (b) The Permittee shall monitor the exhaust air stream pressure drop across the scrubber, and scrubber recirculation rate at least once per week from the scrubbers controlling emissions from units 40-4, 40-3, 40-2, 575-1, 575-3, 5549-1, 5549-2, and 575-2. When, for any one reading, the pressure drop across the scrubber, is outside the range of 6.0 to 12.0 inches of water, or a range established during the last stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. When, for any one reading, the recirculation rate is less than the manufacturer's specifications, or a rate established during the most recent stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure drop or recirculation rate reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.
- (c) The Permittee shall monitor the total static pressure drop across the scrubber at least once daily from the scrubber controlling emissions from unit 5549-28 when 5549-28 is in operation. When, for any one reading, the pressure drop across the scrubber is outside the normal range of 4.0 and 12.0 inches of water, or a range that indicates proper operation of the unit, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

D.2.6 Visible Emissions Notations

...

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

D.2.11 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C -

Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

4. Condition D.2.9 has been modified to require the Permittee to notify IDEM, OAQ when a broken bag will not be fixed within 10 days and when it will be fixed.

D.2.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). **If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

5. For clarification an additional rule cite has been added to Condition B.21, Inspection and Entry.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [[IC 13-30-3-1] **[IC 13-17-3-2]**

6. For consistency and clarification purposes the name "source" has been changed to "Permittee" in the following three C Conditions:

C.8 Performance Testing [326 IAC 3-6]

...

- (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~~ **Permittee** submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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

7. The emission statement 326 IAC 2-6 rule language has been updated as follows:

C.17 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~~. **This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3** by April 15 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 regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. 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

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The emission statement does require the certification by the "responsible official" as defined by 326 IAC ~~2-7-1(34)~~**2-1.1-1(1)**.

~~(e)~~**(b)** 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, and the OES on or before the date it is due.