

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Azteca Milling, L.P.
15700 Highway 41 North
Evansville, Indiana 47711**

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

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

Operation Permit No.: T163-7995-00107	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary wet corn milling operation producing corn flour at a maximum rate of 160,000 metric tons per year.

Responsible Official:	Antonio Carrillo
Source Address:	15700 Highway 41 North, Evansville, Indiana 47711
Mailing Address:	P.O. Box 23550, Evansville, Indiana 47724
SIC Code:	2046
County Location:	Vanderburgh
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules;

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) two (2) natural gas-fired steam boilers, identified as Unit 1 Boiler and Unit 2 Boiler, constructed in 1995 and 1996 respectively, each rated at 10.46 million (MM) British thermal units (Btu) per hour, each exhausting through one (1) stack (ID Stacks 7 and 107), respectively;
- (b) one (1) corn receiving pit, identified as Corn Receiving Pit C, constructed in 1995, located in an enclosed building, with a maximum capacity of 80 metric tons per hour, with a baghouse (ID B1) for particulate matter control, exhausting through one (1) stack (ID Stack 6);
- (c) two (2) corn screeners, identified as Unit 1 Screener and Unit 2 Screener, constructed in 1995 and 1996 respectively, each with a maximum capacity of 30 metric tons per hour, with a baghouse (ID B1) for particulate matter control, exhausting through one (1) stack (ID Stack 6);
- (d) one (1) lime bin system, constructed in 1995, with a maximum throughput capacity of 22.5 metric tons per hour, using a baghouse (ID B2) for particulate matter control, exhausting through one (1) stack (ID Stack 9);
- (e) one (1) drying line, identified as C101, constructed in 1995, with a maximum capacity of 9.13 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as "Unit 1, Drying First Circuit Cyclone", and heat recovery system for particulate matter control, exhausting through one (1) stack (ID Stack 10);
- (f) one (1) drying line, identified as C102, constructed in 1996, with a maximum capacity of 9.13 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as "Unit 2, Drying First Circuit Cyclone", and heat recovery system for particulate matter control, exhausting through one (1) stack (ID Stack 110);

- (g) one (1) drying line, identified as C201, constructed in 1995, with a maximum capacity of 9.13 metric tons per hour, with a cyclone, identified as "Unit 1, Drying Second Circuit Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 11);
- (h) one (1) drying line, identified as C202, constructed in 1996, with a maximum capacity of 9.13 metric tons per hour, with a cyclone, identified as "Unit 2, Drying Second Circuit Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 111);
- (i) one (1) flour cooler, identified as FC1, constructed in 1995, with a maximum capacity of 9.13 metric tons per hour, with a cyclone, identified as "Flour Cooler Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 12);
- (j) one (1) flour cooler, identified as FC2, constructed 1996, with a maximum capacity of 9.13 metric tons per hour, with a cyclone, identified as "Flour Cooler Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 112);
- (k) one (1) flour sifter system, identified as FS1, constructed in 1995, with a maximum capacity of 9.13 metric tons per hour, using a baghouse (ID B3) for particulate matter control, exhausting through one (1) stack (ID Stack 13);
- (l) one (1) flour sifter system, identified as FS2, constructed in 1996, with a maximum capacity of 9.13 metric tons per hour, using a baghouse (ID B4) for particulate matter control, exhausting through one (1) stack (ID Stack 113);
- (m) one (1) milled and dried flour unit, identified as MDF1, constructed in 1995, with a maximum capacity of 9.13 metric tons per hour, using a baghouse (ID B5) for particulate matter control, exhausting through one (1) stack (ID Stack 14);
- (n) one (1) milled and dried flour unit, identified as MDF2, constructed in 1996, with a maximum capacity of 9.13 metric tons per hour, using a baghouse (ID B6) for particulate matter control, exhausting through one (1) stack (ID Stack 114);
- (o) one (1) corn skin separator, identified as CSS1, constructed in 1995, with a maximum capacity of 0.647 ton per hour, using a baghouse (ID B8) for particulate matter control, exhausting through one (1) stack (ID Stack 40);
- (p) one (1) pair of corn skin separators, identified as CSS2N and CSS2S, constructed in 1996, each with a maximum capacity of 0.323 ton per hour, each using a baghouse (ID B9N and B9S, respectively) for particulate matter control, each exhausting through one (1) stack (ID Stacks 140N and 140S, respectively);
- (q) one (1) corn skin storage system, constructed in 1995, with a maximum capacity of 1.294 metric tons per hour, using a baghouse (ID B9) for PM control, exhausting through one (1) stack (ID Stack 15); and
- (r) one (1) rail loading system, constructed in 1995, with a maximum capacity of 21.77 metric tons per hour, using a cartridge filter (ID B10) for particulate matter control, exhausting through one (1) stack (ID Stack 49).

Note: The previous construction permit (CP-163-4433-00107) issued to this source on June 30, 1995, included six (6) grain dryers, three (3) corn receiving pits and corn scalping. The source has stated that construction of the grain dryers, two (2) of the corn receiving pits, and the corn scalpers never occurred and the project was postponed indefinitely.

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) Other categories with PM emissions below insignificant thresholds:
 - (1) twenty-four (24) flour storage bins, each with one (1) baghouse for PM emissions control, each exhausting through one stack (ID Stacks 16 through 39). [326 IAC 6-3-2]
 - (2) a pneumatic conveying system for collection of flour from storage bins, with six (6) baghouses for PM emissions control, exhausting through six (6) stacks (ID Stacks 43 through 48), respectively . [326 IAC 6-3-2]
 - (3) two (2) rework bins, each with one (1) baghouse for PM emissions control, each exhausting through one (1) stack (ID Stacks 41 and 42). [326 IAC 6-3-2]
 - (4) one (1) ingredients hopper, with one (1) baghouse for PM emissions control exhausting through one (1) stack (ID Stack 53). [326 IAC 6-3-2]
 - (5) two (2) packaging machines, with one (1) baghouse for PM emissions control, exhausting through one (1) stack (ID Stack 50). [326 IAC 6-3-2]
 - (6) sack dumping, exhausting indoors through one (1) stack (ID Stack 54). [326 IAC 6-3-2]
 - (7) two (2) lime hoppers, each with a maximum throughput capacity of 8.3 metric tons per hour, each exhausting through one (1) stack (ID Stacks 8 and 108). [326 IAC 6-3-2]

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

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

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

SECTION B

GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

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

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

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

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U.S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

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

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

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

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventative maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

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

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

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). The permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) In addition to the non-applicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:
- (1) The requirement from CP 163-4433-00107, Operating Condition 6, listing requirements of a grain processing weight limit so that 326 IAC 2-2 and 40 CFR 52.21 would not apply, is not applicable because IDEM, OAQ has determined that based on the current maximum throughput of 80 metric tons per hour of corn grain to the source, the potential PM emissions are below the PSD threshold level of 250 tons per year.
- (d) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (e) 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.
- (f) 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.
- (g) 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).
- (h) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (i) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

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

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

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

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

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

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

B.16 Permit Modification, Reopening, Revocation and Re-issuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) **Right to Operate After Application for Renewal** [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) **United States Environmental Protection Agency Authority** [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

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

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

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

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

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

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

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

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

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.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 (English) per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.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

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

C.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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.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. 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 ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

Unless otherwise specified in the approval for the new emissions units, 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) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge will adequately ensure compliance with permit conditions requiring the measurement of pressure drop.

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

within ninety (90) days after the date of issuance of this permit.

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

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

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

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied;
 - (3) An automatic measurement was taken when the process was not operating;

- (4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee’s failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

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

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

C.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 must be received 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 other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting 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

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

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

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

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.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)]:

- (a) two (2) natural gas-fired steam boilers, identified as Unit 1 Boiler and Unit 2 Boiler, each rated at 10.46 million (MM) British thermal units (Btu) per hour, each exhausting through one (1) stack (ID Stacks 7 and 107), respectively.

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

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

D.1.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(b), particulate matter emissions from each of the two (2) boilers (ID Unit 1 Boiler and Unit 2 Boiler) shall be limited to no greater than 0.01 gr/dscf.

D.1.2 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (c)), particulate emissions from each of the two (2) boilers (ID Unit 1 Boiler and Unit 2 Boiler) shall be limited by the following:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{where: } Pt = \text{pounds of particulate matter emitted per million Btu heat input}$$

Q = total source maximum operating capacity rating in MMBtu per hour heat input.

This is equivalent to 0.494 pounds of PM per MMBtu of heat input for each boiler or 5.13 pounds of PM per hour for each boiler.

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

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

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

There are no compliance monitoring requirements specifically applicable to the facility.

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

D.1.4 Record Keeping Requirements [326 IAC 12] [40 CFR 60.40c - 60.48c]

- (a) Pursuant to CP-163-4433-00107, issued June 30, 1995, each of the two (2) boilers (ID Unit 1 Boiler and Unit 2 Boiler), which only combust natural gas, shall comply with the record keeping and reporting requirements under 40 CFR 60.48c (a) and (g). This source has complied with the notification requirements under 40 CFR 60.48c (a). The applicable record keeping requirements are as follows:
- (1) The Permittee shall record and maintain records for a period of two years of the amounts of each fuel combusted during each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

- (a) The Permittee shall certify, on the form provided, that natural gas was fired in the boiler at all times during each six (6) month period. Alternatively, the Permittee shall report the number of days during which an alternate fuel was burned during each six (6) month period.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (b) one (1) corn receiving pit, identified as Corn Receiving Pit C, located in an enclosed building, with a maximum capacity of 80 metric tons per hour, with a baghouse (ID B1) for particulate matter control, exhausting through one (1) stack (ID Stack 6);
- (c) two (2) corn screeners, identified as Unit 1 Screener and Unit 2 Screener, each with a maximum capacity of 30 metric tons per hour, with a baghouse (ID B1) for particulate matter control, exhausting through one (1) stack (ID Stack 6);
- (d) one (1) lime bin system, with a maximum throughput capacity of 22.5 metric tons per hour, using a baghouse (ID B2) for particulate matter control, exhausting through one (1) stack (ID Stack 9);
- (e) one (1) drying line, identified as C101, with a maximum capacity of 9.13 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as "Unit 1, Drying First Circuit Cyclone", and heat recovery system for particulate matter control, exhausting through one (1) stack (ID Stack 10);
- (f) one (1) drying line, identified as C102, with a maximum capacity of 9.13 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as "Unit 2, Drying First Circuit Cyclone", and heat recovery system for particulate matter control, exhausting through one (1) stack (ID Stack 110);
- (g) one (1) drying line, identified as C201, with a maximum capacity of 9.13 metric tons per hour, with a cyclone, identified as "Unit 1, Drying Second Circuit Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 11);
- (h) one (1) drying line, identified as C202, with a maximum capacity of 9.13 metric tons per hour, with a cyclone, identified as "Unit 2, Drying Second Circuit Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 111);
- (i) one (1) flour cooler, identified as FC1, with a maximum capacity of 9.13 metric tons per hour, with a cyclone, identified as "Flour Cooler Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 12);
- (j) one (1) flour cooler, identified as FC2, with a maximum capacity of 9.13 metric tons per hour, with a cyclone, identified as "Flour Cooler Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 112);
- (k) one (1) flour sifter system, identified as FS1, with a maximum capacity of 9.13 metric tons per hour, using a baghouse (ID B3) for particulate matter control, exhausting through one (1) stack (ID Stack 13);
- (l) one (1) flour sifter system, identified as FS2, with a maximum capacity of 9.13 metric tons per hour, using a baghouse (ID B4) for particulate matter control, exhausting through one (1) stack (ID Stack 113);
- (m) one (1) milled and dried flour unit, identified as MDF1, with a maximum capacity of 9.13 metric tons per hour, using a baghouse (ID B5) for particulate matter control, exhausting through one (1) stack (ID Stack 14);
- (n) one (1) milled and dried flour unit, identified as MDF2, with a maximum capacity of 9.13 metric tons per hour, using a baghouse (ID B6) for particulate matter control, exhausting through one (1) stack (ID Stack 114);

- (o) one (1) corn skin separator, identified as CSS1, with a maximum capacity of 0.647 ton per hour, using a baghouse (ID B8) for particulate matter control, exhausting through one (1) stack (ID Stack 40);
- (p) one (1) pair of corn skin separators, identified as CSS2N and CSS2S, each with a maximum capacity of 0.323 ton per hour, each using a baghouse (ID B9N and B9S, respectively) for particulate matter control, each exhausting through one (1) stack (ID Stacks 140N and 140S, respectively);
- (q) one (1) corn skin storage system, with a maximum capacity of 1.294 metric tons per hour, using a baghouse (ID B9) for PM control, exhausting through one (1) stack (ID Stack 15); and
- (r) one (1) rail loading system, with a maximum capacity of 21.77 metric tons per hour, using a cartridge filter (ID B10) for particulate matter control, exhausting through one (1) stack (ID Stack 49).

(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 New Source Performance Standard for Grain Elevators [326 IAC 12] [40 CFR 60.300 - 60.304, Subpart DD]

Pursuant to 40 CFR 60.302, the following shall apply:

- (a) The particulate matter emissions from the corn screeners, both of which exhaust through baghouse B1, shall not exceed 0.01 grains per dry standard cubic foot (gr/dscf). This is equivalent to a particulate matter emission rate of 0.26 pounds per hour at an exhaust flow rate of 3,000 acfm.
- (b) The visible emissions from the corn screeners shall not exhibit greater than 0 percent opacity.
- (c) The particulate matter emissions from the corn skin storage system, which exhausts through baghouse B9, shall not exceed 0.01 grains per dry standard cubic foot (gr/dscf). This is equivalent to a particulate matter emission rate of 0.34 pounds per hour at an exhaust flow rate of 4,000 acfm.
- (d) The visible emissions from the corn skin storage system shall not exhibit greater than 0 percent opacity.
- (e) The fugitive emissions from the railcar unloading station shall not exhibit greater than 5 percent opacity.

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

Pursuant to 326 IAC 6-1-2(a)(Non-attainment Area Particulate Limitations), particulate matter (PM) emissions from the facilities listed below shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf). The equivalent pound per hour emission rates are calculated as follows:

Facility ID	Stack ID	Air Flow Rate (acfm)	326 IAC 6-1-2 allowable PM emission rate (lb/hr)
Corn Receiving & Screening	6	3000.00	0.77
Lime Bin System	9	149	0.04
C101 Drying Line	10	45000	11.57
C201 Drying Line	11	35000	9.0
C102 Drying Line	110	45000	11.57
C202 Drying Line	111	35000	9.0
Flour Cooler FC1	12	12000	3.09
Flour Cooler FC2	112	12000	3.09
Flour Sifter System FS1	13	366	0.09
Flour Sifter System FS2	113	366	0.09
Milled & Dried Flour Unit MDF1	14	1450	0.37
Milled & Dried Flour Unit MDF2	114	1450	0.37
Corn Skin Separator CSS1	40	6518	1.68
Corn Skin Separator CSS2N	140N	6518	1.68
Corn Skin Separator CSS2S	140S	6518	1.68
Corn Skin Storage System	15	4000	1.03
Rail Loading System	49	1396	0.36

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between 12 and 18 months after issuance of this permit, in order to demonstrate compliance with Condition D.2.2, the Permittee shall perform PM testing on baghouse B1 (Stack 6), baghouse B2 (Stack 9), the Unit 1, Drying First Circuit Cyclone (Stack 10), the Unit 1, Drying Second Circuit Cyclone (Stack 11), the Flour Cooler Cyclone (Stack 12), baghouse B3 (Stack 13), baghouse B5 (Stack 14), baghouse B8 (Stack 40), baghouse B9 (Stack 15), and cartridge filter B10 (Stack 49), utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

D.2.5 Particulate Matter (PM)

- (a) Pursuant to CP-163-4433-00107, issued on June 30, 1995, and in order to comply with Condition D.2.2, the baghouses for PM control shall be in operation and control emissions from the corn receiving pit, the corn screeners, the lime bin system, the two (2) flour sifter systems, the two (2) milled and dried flour units, the three (3) corn skin separators, and the corn skin storage system at all times that these facilities are in operation.
- (b) The cyclones shall be in operation and control emissions from the four (4) drying lines and the two (2) flour coolers at all times that these facilities are in operation.
- (c) The cartridge filter shall be in operation and control emissions from the rail loading system at all times that the rail loading system is 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 each of the baghouse stacks identified as Stacks 6 and 15 and each of the cyclone stacks identified as Stacks 10 and 110 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.7 Parametric Monitoring

- (a) The Permittee shall record the total static pressure drop across each of the baghouses (ID B1 and B9) used in conjunction with the corn receiving and screening and the corn skin storage system, at least once per shift when the corn receiving and screening and the corn skin storage system are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each of the baghouses shall be maintained within the range of 1.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C- Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) The Permittee shall record the total static pressure drop across each of the cyclones (ID Unit 1 Drying 1st Cyclone, and Unit 2 Drying 1st Cyclone) used in conjunction with the C101 and C102 Drying lines, at least once per shift when the C101 and C102 Drying lines are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each of the cyclones shall be maintained within the range of 1.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

D.2.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the corn receiving and screening and the corn skin storage system when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.9 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the C101 and C102 Drying lines when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.2.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B - Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.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).

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.2.6, the Permittee shall maintain records of visible emission notations of the baghouse stack exhausts identified as Stacks 6 and 15 and each of the cyclone stack exhausts identified as Stacks 10 and 110 once per shift.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain the following for each baghouse and each cyclone:
 - (1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle operation.
 - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Conditions D.2.8 and D.2.9, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.8 and D.2.9 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

Insignificant Activities

- (a) Other categories with PM emissions below insignificant thresholds:
- (1) twenty-four (24) flour storage bins, each with one (1) baghouse for PM emissions control, each exhausting through one stack (ID Stacks 16 through 39).
 - (2) a pneumatic conveying system for collection of flour from storage bins, with six (6) baghouses for PM emissions control, exhausting through six (6) stacks (ID Stacks 43 through 48), respectively.
 - (3) two (2) rework bins, each with one (1) baghouse for PM emissions control, each exhausting through one (1) stack (ID Stacks 41 and 42).
 - (4) one (1) ingredients hopper, with one (1) baghouse for PM emissions control exhausting through one (1) stack (ID Stack 53).
 - (5) two (2) packaging machines, with one (1) baghouse for PM emissions control, exhausting through one (1) stack (ID Stack 50).
 - (6) sack dumping, exhausting indoors through one (1) stack (ID Stack 54).
 - (7) two (2) lime hoppers, each with a maximum throughput capacity of 8.3 metric tons per hour, each exhausting through one (1) stack (ID Stacks 8 and 108).

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

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

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

Pursuant to 326 IAC 6-1-2(a)(Non-attainment Area Particulate Limitations), particulate matter (PM) emissions from each of the facilities listed above shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

Compliance Determination Requirements

D.3.2 Particulate Matter (PM)

The baghouses for PM control shall be in operation and control emissions from the twenty-four (24) flour storage bins, the pneumatic conveying system, the two (2) rework bins, the ingredients hopper, the two (2) packaging machines, the sack dumping operation, and the two (2) lime hoppers at all times that these facilities are in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Azteca Milling, L.P.
Source Address: 15700 Highway 41 North, Evansville, Indiana 47711
Mailing Address: P.O. Box 23550, Evansville, Indiana 47724
Part 70 Permit No.: T163-7995-00107

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Azteca Milling, L.P.
Source Address: 15700 Highway 41 North, Evansville, Indiana 47711
Mailing Address: P.O. Box 23550, Evansville, Indiana 47724
Part 70 Permit No.: T163-7995-00107

This form consists of 2 pages

Page 1 of 2

<p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">c The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); andc The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

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

Source Name: Azteca Milling, L.P.
Source Address: 15700 Highway 41 North, Evansville, Indiana 47711
Mailing Address: P.O. Box 23550, Evansville, Indiana 47724
Part 70 Permit No.: T163-7995-00107

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

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

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

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

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

Source Name: Azteca Milling, L.P.
 Source Address: 15700 Highway 41 North, Evansville, Indiana 47711
 Mailing Address: P.O. Box 23550, Evansville, Indiana 47724
 Part 70 Permit No.: T163-7995-00107

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

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

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

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

Source Background and Description

Source Name: Azteca Milling, L.P.
Source Location: 15700 Highway 41 North, Evansville, Indiana 47711
County: Vanderburgh
SIC Code: 2046
Operation Permit No.: T163-7995-00107
Permit Reviewer: Trish Earls/EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Azteca Milling, L.P. relating to the operation of a wet corn milling operation producing corn flour at a maximum rate of 160,000 metric tons per year.

Permitted Emission Units and Pollution Control Equipment

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

- (a) two (2) natural gas-fired steam boilers, identified as Unit 1 Boiler and Unit 2 Boiler, constructed in 1995 and 1996 respectively, each rated at 10.46 million (MM) British thermal units (Btu) per hour, each exhausting through one (1) stack (ID Stacks 7 and 107), respectively;
- (b) one (1) corn receiving pit, identified as Corn Receiving Pit C, constructed in 1995, located in an enclosed building, with a maximum capacity of 80 metric tons per hour, with a baghouse (ID B1) for particulate matter control, exhausting through one (1) stack (ID Stack 6);
- (c) two (2) corn screeners, identified as Unit 1 Screener and Unit 2 Screener, constructed in 1995 and 1996 respectively, each with a maximum capacity of 30 metric tons per hour, with a baghouse (ID B1) for particulate matter control, exhausting through one (1) stack (ID Stack 6);
- (d) one (1) lime bin system, constructed in 1995, with a maximum throughput capacity of 22.5 metric tons per hour, using a baghouse (ID B2) for particulate matter control, exhausting through one (1) stack (ID Stack 9);
- (e) one (1) drying line, identified as C101, constructed in 1995, with a maximum capacity of 9.13 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as "Unit 1, Drying First Circuit Cyclone", and heat recovery system for particulate matter control, exhausting through one (1) stack (ID Stack 10);

- (f) one (1) drying line, identified as C102, constructed in 1996, with a maximum capacity of 9.13 metric tons per hour, with one (1) natural gas-fired flour dryer, rated at 18 MMBtu per hour, with a cyclone, identified as "Unit 2, Drying First Circuit Cyclone", and heat recovery system for particulate matter control, exhausting through one (1) stack (ID Stack 110);
- (g) one (1) drying line, identified as C201, constructed in 1995, with a maximum capacity of 9.13 metric tons per hour, with a cyclone, identified as "Unit 1, Drying Second Circuit Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 11);
- (h) one (1) drying line, identified as C202, constructed in 1996, with a maximum capacity of 9.13 metric tons per hour, with a cyclone, identified as "Unit 2, Drying Second Circuit Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 111);
- (i) one (1) flour cooler, identified as FC1, constructed in 1995, with a maximum capacity of 9.13 metric tons per hour, with a cyclone, identified as "Flour Cooler Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 12);
- (j) one (1) flour cooler, identified as FC2, constructed in 1996, with a maximum capacity of 9.13 metric tons per hour, with a cyclone, identified as "Flour Cooler Cyclone", for particulate matter control, exhausting through one (1) stack (ID Stack 112);
- (k) one (1) flour sifter system, identified as FS1, constructed in 1995, with a maximum capacity of 9.13 metric tons per hour, using a baghouse (ID B3) for particulate matter control, exhausting through one (1) stack (ID Stack 13);
- (l) one (1) flour sifter system, identified as FS2, constructed in 1996, with a maximum capacity of 9.13 metric tons per hour, using a baghouse (ID B4) for particulate matter control, exhausting through one (1) stack (ID Stack 113);
- (m) one (1) milled and dried flour unit, identified as MDF1, constructed in 1995, with a maximum capacity of 9.13 metric tons per hour, using a baghouse (ID B5) for particulate matter control, exhausting through one (1) stack (ID Stack 14);
- (n) one (1) milled and dried flour unit, identified as MDF2, constructed in 1996, with a maximum capacity of 9.13 metric tons per hour, using a baghouse (ID B6) for particulate matter control, exhausting through one (1) stack (ID Stack 114);
- (o) one (1) corn skin separator, identified as CSS1, constructed in 1995, with a maximum capacity of 0.647 ton per hour, using a baghouse (ID B8) for particulate matter control, exhausting through one (1) stack (ID Stack 40);
- (p) one (1) pair of corn skin separators, identified as CSS2N and CSS2S, constructed in 1996, each with a maximum capacity of 0.323 ton per hour, each using a baghouse (ID B9N and B9S, respectively) for particulate matter control, each exhausting through one (1) stack (ID Stacks 140N and 140S, respectively);
- (q) one (1) corn skin storage system, constructed in 1995, with a maximum capacity of 1.294 metric tons per hour, using a baghouse (ID B9) for PM control, exhausting through one (1) stack (ID Stack 15); and
- (r) one (1) rail loading system, constructed in 1995, with a maximum capacity of 21.77 metric tons per hour, using a cartridge filter (ID B10) for particulate matter control, exhausting through one (1) stack (ID Stack 49).

Note: The previous construction permit (CP-163-4433-00107) issued to this source on June 30, 1995, included six (6) grain dryers, three (3) corn receiving pits and corn scalping. The source has stated that construction of the grain dryers, two (2) of the corn receiving pits, and the corn scalpers never occurred and the project was postponed indefinitely.

Unpermitted Emission Units and Pollution Control Equipment

There are no un-permitted 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) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Combustion source flame safety purging on startup.
- (c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings (applied to bearings and moving parts).
- (d) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (e) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (g) Process vessel degassing and cleaning to prepare for internal repairs.
- (h) Paved and unpaved roads and parking lots with public access.
- (i) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (j) Blow down for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (k) Other categories with PM emissions below insignificant thresholds:
 - (1) twenty-four (24) flour storage bins, each with one (1) baghouse for PM emissions control, each exhausting through one stack (ID Stacks 16 through 39).
 - (2) a pneumatic conveying system for collection of flour from storage bins, with six (6) baghouses for PM emissions control, exhausting through six (6) stacks (ID Stacks 43 through 48), respectively.
 - (3) two (2) rework bins, each with one (1) baghouse for PM emissions control, each exhausting through one (1) stack (ID Stacks 41 and 42).
 - (4) one (1) ingredients hopper, with one (1) baghouse for PM emissions control exhausting through one (1) stack (ID Stack 53).
 - (5) two (2) packaging machines, with one (1) baghouse for PM emissions control, exhausting through one (1) stack (ID Stack 50).
 - (6) sack dumping, exhausting indoors through one (1) stack (ID Stack 54).

- (7) two (2) lime hoppers, each with a maximum throughput capacity of 8.3 metric tons per hour, each with one (1) baghouse for PM emissions control, each exhausting through one (1) stack (ID Stacks 8 and 108).
- (8) two (2) waste lagoons and processing systems using flares to combust methane.

Existing Approvals

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

- (a) CP 163-4433-00107, issued on June 30, 1995.

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

- (a) CP 163-4433-00107, issued on June 30, 1995.

Operation Condition 6:

- (6) That the total amount of corn grain processed shall not exceed 95,000 metric tons per month. Compliance with this condition and all other Operating Conditions in this permit shall restrict the PM emissions to below the Prevention of Significant Deterioration, PSD threshold level, therefore, this rule 326 IAC 2-2 and 40 CFR 52.21 will not apply in this case.

Reason not incorporated:

This condition was not incorporated in the Part 70 permit because based on the current maximum throughput of 80 metric tons per hour of corn grain to the source, or 700,800 metric tons per year (58,400 metric tons per month), potential PM emissions are below the PSD threshold level of 250 tons (English) per year, therefore, a corn grain throughput limit is no longer necessary.

The record keeping and reporting requirements in Operating Condition 7 of the above listed permit are also no longer necessary, therefore this condition will also not be incorporated into the Part 70 permit.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the baghouses, cartridge filters, and cyclones be considered as an integral part of the milling operation:

- (a) These pieces of equipment are "filter/collectors" which collect and return raw material and ingredients collected to the process. The raw materials are conveyed pneumatically.
- (b) The process could not be operated without the dust collectors also being in operation since 100% of the raw materials collected by the dust collectors are recycled to ensure that all of the raw materials are used in the process.

IDEM, OAM has evaluated the justifications and agreed that the baghouses, cartridge filters, and cyclones will be considered as an integral part of the process. Therefore, the permitting level will be determined using the potential to emit after the baghouses, cartridge filters, and cyclones. Operating conditions in the proposed permit will specify that the baghouses, cartridge filters, and cyclones shall operate at all times when the milling operations are in operation.

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 incomplete Part 70 permit application for the purposes of this review was received on December 16, 1996. Additional information received on January 21, 1997, March 3, 2000, and August 28, 2000 makes the Part 70 permit application administratively complete. There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (4 pages).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

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

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

There are no HAP emissions from this source.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 is equal to or greater than 100 tons (English) per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

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

Pollutant	Actual Emissions (tons (English)/year)
PM	140
PM-10	140
SO ₂	0.0
VOC	0.0
CO	6.0
NO _x	23.0
HAP (specify)	N/A

Potential to Emit After Issuance

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

Process/facility	Potential to Emit (tons (English)/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Boilers	0.18	0.70	0.06	0.50	7.7	9.16	<1
Corn Receiving and Screening	1.13	1.13	0.0	0.0	0.0	0.0	0.0
Lime Bin System	0.05	0.05	0.0	0.0	0.0	0.0	0.0
1 st Circuit Drying Lines C101 and C102*	88.16	89.06	0.10	0.86	13.24	15.76	negl.
2 nd Circuit Drying Lines C201 and C202	70.96	70.96	0.0	0.0	0.0	0.0	0.0
Flour Coolers	25.22	25.22	0.0	0.0	0.0	0.0	0.0
Flour Sifter Systems	0.38	0.38	0.0	0.0	0.0	0.0	0.0
Milled and Dried Flour Units	0.92	0.92	0.0	0.0	0.0	0.0	0.0
Corn Skin Separators	2.58	2.58	0.0	0.0	0.0	0.0	0.0
Corn Skin Storage	1.50	1.50	0.0	0.0	0.0	0.0	0.0
Rail Loading System	1.57	1.57	0.0	0.0	0.0	0.0	0.0
Total Emissions**	192.65	194.07	0.16	1.36	20.94	24.92	<1
PSD Threshold	250	250	250	250	250	250	N/A

* Note: Emissions from 1st Circuit Drying represent potential controlled emissions and include combustion emissions from flour dryers.

** Total emissions include emissions from Insignificant Activities which were determined to be negligible based on stack test data that indicated 0% opacity readings for these operations.

This existing source is not a major stationary PSD source because no attainment regulated pollutant is emitted at a rate of 250 tons (English) per year or more, and it is not one of the 28 listed source categories.

County Attainment Status

The source is located in Vanderburgh County.

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

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. The Evansville area of Vanderburgh County has been designated as maintenance/attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Vanderburgh County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Note: Although this source is located in Evansville, Indiana, it is outside of a 4 mile radius of the corporate limits of the city of Evansville, therefore, this source is not under the jurisdiction of the Evansville EPA, a local agency. This has been confirmed by the inspector for this source.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) The grain handling operations, which are the corn screeners, the corn skin storage system, and the railcar unloading operation, were constructed prior to August 3, 1978. Pursuant to 40 CFR 60.300, these types of operations are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.300 - 60.304, Subpart DD, "Standards of Performance for Grain Elevators") because they are affected facilities which are part of a grain storage elevator at a wet corn mill plant that has a storage capacity of greater than one million (1,000,000) bushels. Pursuant to this rule, the particulate matter emissions from the corn screeners, both of which exhaust through baghouse B1, shall not exceed 0.01 grains per dry standard cubic foot (gr/dscf). This is equivalent to a particulate matter emission rate of 0.26 pounds per hour at an exhaust flow rate of 3,000 acfm. The visible emissions from the corn screeners shall not exhibit greater than 0 percent opacity. The particulate matter emissions from the corn skin storage system, which exhausts through baghouse B9, shall not exceed 0.01 grains per dry standard cubic foot (gr/dscf). This is equivalent to a particulate matter emission rate of 0.34 pounds per hour at an exhaust flow rate of 4,000 acfm. The visible emissions from the corn skin storage system shall not exhibit greater than 0 percent opacity. The fugitive emissions from the railcar unloading station shall not exhibit greater than 5 percent opacity. The baghouse (ID B1) controlling particulate matter emissions from the corn screeners and the baghouse (ID B9) controlling particulate matter emissions from the corn skin storage system shall be in operation at all times that the corn screeners and corn skin storage system are in operation to comply with this limit.
- (b) The two (2) steam boilers, identified as Unit 1 Boiler and Unit 2 Boiler, are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c - 60.48c, Subpart Dc, "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units") because they were each constructed after June 9, 1989, and each has a maximum design heat input capacity greater than 10 MMBtu per hour and less than 100 MMBtu per hour. However, since each of these boilers only combusts natural gas, they are subject only to the record keeping and reporting requirements under 40 CFR 60.48c (a) and (g). The applicable record keeping and reporting requirements are as follows:
- (1) The Permittee shall record and maintain records for a period of two years of the amounts of each fuel combusted during each month.
- Note: The requirement to submit the date of construction, the date of anticipated startup and the date of actual startup notification was included in CP-163-4433-00107, issued to the source on June 30, 1995. The source has fulfilled the notification requirement, therefore, this requirement will not be included in the Title V permit.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Vanderburgh County and has the potential to emit more than ten (10) tons (English) per year of NO_x. 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 forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

Note: Although this source is located in Evansville, Indiana, it is outside of a 4 mile radius of the corporate limits of the city of Evansville, therefore, 326 IAC 5-1-2(2) does not apply.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

State Rule Applicability - Individual Facilities

326 IAC 6-1-2 (Non-attainment Area Particulate Limitations)

All facilities at this source are subject to this rule because this source is located in Vanderburgh County and has potential particulate matter emissions greater than 100 tons (English) per year. Pursuant to 326 IAC 6-1-2(a), particulate matter emissions from the facilities listed below shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf). The equivalent pound per hour emission rates are calculated as follows:

Facility ID	Stack ID	Air Flow Rate (acfm)	326 IAC 6-1-2 allowable PM emission rate (lb/hr)	Controlled PM emission rate (lb/hr)	In Compliance?
Corn Receiving & Screening	6	3000.00	0.77	0.26	Yes
Lime Bin System	9	149	0.04	0.01	Yes
C101 Drying Line	10	45000	11.57	10.03	Yes
C201 Drying Line	11	35000	9.0	8.10	Yes
C102 Drying Line	110	45000	11.57	10.03	Yes
C202 Drying Line	111	35000	9.0	8.10	Yes
Flour Cooler FC1	12	12000	3.09	2.88	Yes
Flour Cooler FC2	112	12000	3.09	2.88	Yes

Facility ID	Stack ID	Air Flow Rate (acfm)	326 IAC 6-1-2 allowable PM emission rate (lb/hr)	Controlled PM emission rate (lb/hr)	In Compliance?
Flour Sifter System FS1	13	366	0.09	0.04	Yes
Flour Sifter System FS2	113	366	0.09	0.04	Yes
Milled & Dried Flour Unit MDF1	14	1450	0.37	0.11	Yes
Milled & Dried Flour Unit MDF2	114	1450	0.37	0.11	Yes
Corn Skin Separator CSS1	40	6518	1.68	0.20	Yes
Corn Skin Separator CSS2N	140N	6518	1.68	0.20	Yes
Corn Skin Separator CSS2S	140S	6518	1.68	0.20	Yes
Corn Skin Storage System	15	4000	1.03	0.34	Yes
Rail Loading System	49	1396	0.36	0.36	Yes

The two (2) steam boilers, identified as Unit 1 Boiler and Unit 2 Boiler, are subject to 326 IAC 6-1-2(b). This limits particulate matter emissions from gaseous fuel-fired combustion steam generators to no greater than 0.01 gr/dscf.

Particulate matter emissions from each of the twenty-four (24) flour storage bins, the pneumatic conveying system, the two (2) rework bins, the ingredients hopper, the two (2) packaging machines, sack dumping, and the two (2) lime hoppers, all of which are insignificant activities, shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf) as required by 326 IAC 6-1-2.

This source is not subject to the requirements of 326 IAC 6-1-2(d) because this grain processing source has a permanent grain storage capacity of less than 1,000,000 U.S. bushels.

326 IAC 6-3-2 (Process Operations)

The facilities at this source are not subject to the requirements of 326 IAC 6-3-2. This rule does not apply if the limitation established in the rule is not consistent with applicable limitations in 326 IAC 6-1 or 326 IAC 12. Since the applicable PM limits established by 326 IAC 6-1-2 and 326 IAC 12, 40 CFR 60.300, Subpart DD, are less than the PM limits that would be established by 326 IAC 6-3-2, the more stringent limits apply and the limits pursuant to 326 IAC 6-3-2 do not apply.

326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (c))

The two (2) boilers are subject to the requirements of 326 IAC 6-2-4 because each of the boilers was constructed after September 21, 1983. Pursuant to this rule, PM emissions from each of these indirect heating facilities shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{where: } Pt = \text{pounds of PM emitted per MMBtu heat input.}$$

Q = total source maximum operating capacity rating in MMBtu per hour
heat input = 20.92 MMBtu per hour

This is equivalent to 0.494 pounds of PM per MMBtu of heat input for each boiler or 5.13 pounds of PM per hour for each boiler. Potential PM emissions from each boiler is less than the allowable PM emissions, therefore, the boilers are in compliance with this rule.

Testing Requirements

Particulate matter compliance tests were performed on the corn skin storage system, the corn receiving pit, the lime hopper, one of the storage silos, the rework bin, bagging and packaging, the first drying circuit, the second drying circuit, the cooling circuit, two corn skin separators, the flour sifter and the lime bin to demonstrate compliance with the permit conditions of CP-163-4433-00107, issued June 30, 1995. These tests were conducted at this source from October 7 through 10, 1996 and from October 30, 1996 through November 1, 1996. These tests were determined to be acceptable to IDEM, OAM and all emission units were found to be in compliance. Testing will be required on the corn skin storage system, the corn receiving pit, the first drying circuit, the second drying circuit, the cooling circuit, one of the corn skin separators, the flour sifter and the lime bin within 12 to 18 months after issuance of this permit since the five year period between the required testing will have expired after that time. Testing will not be required on the storage silos, the rework bin, bagging, packaging, and the lime hopper, which are insignificant activities, because they have already had their required initial testing and do not meet the criteria to require additional testing in the Title V permit. Testing will also not be required for the two (2) boilers to demonstrate compliance with 326 IAC 6-1-2 because they are each natural gas fired boilers that do not use back-up fuels.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The baghouses, identified as B1 and B9 and the cyclones identified as Unit 1 Drying 1st cyclone and Unit 2 Drying 1st cyclone have applicable compliance monitoring conditions as specified below:
 - (a) Visible emissions notations of each of the baghouse stacks identified as Stacks 6 and 15 and each of the cyclone stacks identified as Stacks 10 and 110 shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (b) The Permittee shall record the total static pressure drop across each of the control devices listed below controlling the various milling operations, at least once per shift when the milling operations are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each of the control devices shall be maintained within the ranges listed below or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

Control Device ID No.	Pressure Drop Range (inches of water)
Baghouse B1	1.0 - 6.0
Unit 1 Drying 1 st Cyclone	1.0 - 6.0
Unit 2 Drying 1 st Cyclone	1.0 - 6.0
Baghouse B9	1.0 - 6.0

- (c) An inspection shall be performed each calendar quarter of all bags controlling the corn receiving and screening and the corn skin storage system when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (d) An inspection shall be performed each calendar quarter of all cyclones controlling the C101 and C102 Drying lines when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

These monitoring conditions are necessary because the above listed baghouses and cyclones for the milling operations must operate properly to ensure compliance with 40 CFR 60.300 - 60.304, Subpart DD, 326 IAC 6-1-2 (Non-attainment Area Particulate Limitations) and 326 IAC 2-7 (Part 70).

2. The two (2) steam boilers, identified as Unit 1 Boiler and Unit 2 Boiler, have applicable compliance monitoring conditions as specified below:
 - (a) Visible emission notations of each of the boiler stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. 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.

These monitoring conditions are necessary because the above listed boilers must operate properly to ensure compliance with 40 CFR 60.40c - 60.48c, Subpart Dc, 326 IAC 6-1-2 (Non-attainment Area Particulate Limitations), 326 IAC 6-2-4, and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

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

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations. (Appendix A, page 4 of 4)

Conclusion

The operation of this wet corn milling operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T163-7995-00107**.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Permit

Source Name: Azteca Milling, L.P.
Source Location: 15700 Highway 41 North, Evansville, Indiana 47711
County: Vanderburgh
Permit No.: T-163-7995-00107
SIC Code: 2046
Permit Reviewer: Lisa M. Wasiowich/EVP

On December 11, 2000, the Office of Air Quality (OAQ) had a notice published in the Evansville Courier, Evansville, Indiana, stating that Azteca Milling, L.P. had applied for a construction permit to operate a wet corn milling operation producing corn flour, with cyclones, baghouses and filters as particulate control. The notice also stated that OAQ proposed to issue a permit for this installation 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.

All Part 70 permit documents have been revised to reflect the name change of the Office of Air Management (OAM) to the Office of Air Quality (OAQ).

Appendix A: Emission Calculations Summary

Company Name: Azteca Milling, L.P.
Address City IN Zip: 15700 Highway 41 North, Evansville, Indiana 47711
Operation Permit No.: T163-7995
Plt ID: 163-00107
Reviewer: Trish Earls/EVP
Date: December 16, 1996

Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Flour Milling Operations	Natural Gas Combustion	TOTAL
PM	192.16	0.47	192.63
PM10	192.16	1.89	194.05
SO2	0.00	0.15	0.15
NOx	0.00	24.93	24.93
VOC	0.00	1.37	1.37
CO	0.00	20.94	20.94
total HAPs	0.00	0.47	0.47
worst case single HAP	0.00	0.45	0.45
Total emissions based on rated capacity at 8,760 hours/year.			
Note: The baghouses and cyclones, which are part of a pneumatic conveyance system, are used to collect and return raw material to the flour milling process. Therefore, they are considered integral to the process and controlled emissions are equal to potential emissions.			

Appendix A: Process Particulate Emissions

Company Name: Azteca Milling, L.P.
Address City IN Zip: 15700 Highway 41 North, Evansville, Indiana 47711
Operation Permit No.: T163-7995
Plt ID: 163-00107
Reviewer: Trish Earls/EVP
Date: December 16, 1996

State Potential Emissions (tons/year)									
Stack ID	Control Device ID No.	Emission Unit ID	Grain Loading per Actual Cubic Foot of Outlet Air	Air Flow Rate (acfm)	Control Efficiency	Total (lbs/hr)	Total (tons/yr)	326 IAC 6-1-2 Allowable PM Emissions (lb/hr)	40 CFR 60 Subpart DD Allowable PM Emissions (lb/hr)
6	Baghouse B1	Corn Receiving & Screening	0.01000	3000.00	99.99%	0.26	1.13	0.77	0.26
9	Baghouse B2	Lime Bin System	0.00860	149.00	99.99%	0.01	0.05	0.04	N/A
10	Unit 1 Drying 1st Cyclone	C101 Drying Line	0.02600	45000.00	99.94%	10.03	43.93	11.57	N/A
11	Unit 1 Drying 2nd Cyclone	C201 Drying Line	0.02700	35000.00	99.94%	8.10	35.48	9.00	N/A
110	Unit 2 Drying 1st Cyclone	C102 Drying Line	0.02600	45000.00	99.94%	10.03	43.93	11.57	N/A
111	Unit 2 Drying 2nd Cyclone	C202 Drying Line	0.02700	35000.00	99.94%	8.10	35.48	9.00	N/A
12	Flour Cooler Cyclone	Flour Cooler FC1	0.02800	12000.00	99.95%	2.88	12.61	3.09	N/A
112	Flour Cooler Cyclone	Flour Cooler FC2	0.02800	12000.00	99.95%	2.88	12.61	3.09	N/A
13	Baghouse B3	Flour Sifter System FS1	0.01400	366.00	99.99%	0.04	0.19	0.09	N/A
113	Baghouse B4	Flour Sifter System FS2	0.01400	366.00	99.99%	0.04	0.19	0.09	N/A
14	Baghouse B5	Milled & Dried Flour Unit MDF1	0.00850	1450.00	99.99%	0.11	0.46	0.37	N/A
114	Baghouse B6	Milled & Dried Flour Unit MDF2	0.00850	1450.00	99.99%	0.11	0.46	0.37	N/A
40	Baghouse B8	Corn Skin Separator CSS1	0.00350	6518.00	99.99%	0.20	0.86	1.68	N/A
140N	Baghouse B9N	Corn Skin Separator CSS2N	0.00350	6518.00	99.99%	0.20	0.86	1.68	N/A
140S	Baghouse B9S	Corn Skin Separator CSS2S	0.00350	6518.00	99.99%	0.20	0.86	1.68	N/A
15	Baghouse B9	Corn Skin Storage System	0.01000	4000.00	99.99%	0.34	1.50	1.03	0.34
49	Cartridge Filter B10	Rail Loading System	0.03000	1396.00	99.99%	0.36	1.57	0.36	N/A

Total Potential Emissions (metric tons/yr): 192.16

Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls

Note: The baghouses and cyclones, which are part of a pneumatic conveyance system, are used to collect and return raw material to the process. Therefore, they are considered integral to the process and are included in uncontrolled emissions.

The 326 IAC 6-3-2 allowable PM emissions are greater than the controlled emissions for each operation, therefore, all operations are in compliance with this rule.

Based on stack test data, emissions from the 24 flour storage bins, the flour pneumatic conveying system, the rework bins, the ingredients hopper, the packing lines, and sack dumping, which are insignificant activities, are negligible. This is based on 0% opacity readings for these operations taken during a stack test conducted in October, 1996.

State Potential (uncontrolled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

ESP (tons/yr) = No. Units * Loading (grains/acf) * Face Velocity (ft/sec) * Surface Area (ft²) * 1 lb/7,000 grains * 60 sec/min * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Scrubber (tons/yr) = No. Units * Loading (grains/acf) * Flow Rate (gpm) * 1/Liquid to Air Ratio (gpm/1,000 acfm) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Federal Potential (controlled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

ESP (tons/yr) = No. Units * Loading (grains/acf) * Face Velocity (ft/sec) * Surface Area (ft²) * 1 lb/7,000 grains * 60 sec/min * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Scrubber (tons/yr) = No. Units * Loading (grains/acf) * Flow Rate (gpm) * 1/Liquid to Air Ratio (gpm/1,000 acfm) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler**

**Company Name: Azteca Milling, L.P.
Address City IN Zip: 15700 Highway 41 North, Evansville, Indiana 47711
Operating Permit No.: T163-7995
Plt ID: 163-00107
Reviewer: Trish Earls/EVP
Date: March 3, 2000**

Emission Unit ID	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
Boiler	10.46	91.6
Boiler	10.46	91.6
Flour Dryer C101	18.00	157.7
Flour Dryer C102	18.00	157.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Boiler Potential Emission in tons/yr	0.09	0.35	0.03	4.58	0.25	3.85
Boiler Potential Emission in tons/yr	0.09	0.35	0.03	4.58	0.25	3.85
C101 Potential Emission in tons/yr	0.15	0.60	0.05	7.88	0.43	6.62
C102 Potential Emission in tons/yr	0.15	0.60	0.05	7.88	0.43	6.62
Total Emissions in tons/yr	0.47	1.89	0.15	24.93	1.37	20.94

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 3 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

**MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions**

**Company Name: Azteca Milling, L.P.
Address City IN Zip: 15700 Highway 41 North, Evansville, Indiana 47711
Operating Permit No.: T163-7995
Plt ID: 163-00107
Reviewer: Trish Earls/EVP
Date: March 3, 2000**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.236E-04	2.992E-04	1.870E-02	4.488E-01	8.477E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total (ton/yr)
Potential Emission in tons/yr	1.247E-04	2.742E-04	3.490E-04	9.474E-05	5.236E-04	4.705E-01

Methodology is the same as page 2.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.