

John Oliver
U.S. Granules Corporation
P.O. Box 130
1433 Western Avenue
Plymouth, Indiana 46563

Re: SMF 099-8121
First Significant Modification to F 099-5463-00015

Dear Mr. Oliver:

This letter is to correct the FESOP recently issued to U.S. Granules Corporation. This office was notified by two (2) letters dated January 16, 1997 and February 5, 1997, that the following changes needed to be made to the permit.

- 1) The IDEX kiln will not be operational at the time originally intended, therefore, more than 2, 675 hours of operation of charring ovens will be required. The proposed amendment (Sections D.3.1 and D.3.2) will allow operating the charring ovens at a reduced capacity, with a lower particulate emission rate for 6,567 hours.
- 2) Changes in the parameters for the pressure drop for Section D.1.10 and D.2.5, are requested. The pressure drop range for processes A and C should be 1" to 6" of water. The pressure drop range for processes B, D, E, and F should be 1" to 8" of water.
- 3) Change Condition D.1.6 to reflect that the tests shall be performed within 180 days of the date of startup of production of the IDEX rotary kiln and repeated no less than every five (5) years thereafter.
- 4) Change Condition D.2.1 to read PM10 emissions from the shredder/baler (Process D) shall not exceed 2.40 pounds per hour, based on a maximum throughput of 3.75 pounds per hour. It previously stated 3.75 pounds per month.
- 5) Please remove the continuous monitoring requirement for the borings and turnings rotary kiln (Process G, Condition D.1.7) afterburner and allow for the operator to record on an hourly basis the temperature of the exhaust on a temperature monitoring form while operating. There is currently no continuous monitor for this device but there is a temperature gauge which can be read and recorded manually by the operator.
- 6) Please remove the parenthesized emission number limiting monthly emissions following an hourly emission limit throughout the D conditions of the permit.

The above listed changes have been corrected on the attached and revised pages. Please replace the pages in your FESOP with these revised pages.

Please attach a copy of this document to your FESOP. All other permit conditions are unchanged and shall remain in effect.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

klp

Enclosure - Revised Pages 21, 22, 23, 24, 25, 26, 27, 28

cc: File - Marshall County

Marshall County Health Department
Air Compliance Section - Eric Courtright
Permit Tracking - Janet Mobley
Compliance Data Section - Jerri Curless
Technical Support and Modeling - Nancy Landau

SECTION D.1

FACILITY OPERATION CONDITIONS

One (1) monoshear to IDEX rotary pyrolysis kiln, known as Process A, equipped with a natural gas-fired afterburner and a baghouse with a flow rate of 27,330 actual cubic feet per minute, capacity: 4.0 tons per hour.

One (1) borings and turnings rotary kiln and H Line hammermill, known as Process G, equipped with a natural gas-fired afterburner and a baghouse with a flow rate of 4,000 actual cubic feet per minute, capacity: 0.5 tons per hour.

Emissions Limitations [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compound

The volatile organic compound (VOC) emissions from the IDEX rotary pyrolysis kiln (Process A) shall not exceed 5.48 pounds per hour, based on a maximum throughput of 4.0 tons per hour. VOC emissions from the borings and turnings rotary kiln (Process G) shall not exceed 3.0 pounds per hour, based on a maximum throughput of 0.5 tons per hour. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.2 Carbon Monoxide (CO)

CO emissions from IDEX rotary pyrolysis kiln (Process A) shall not exceed 3.48 pounds per hour, based on a maximum throughput of 4.0 tons per hour. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.3 Fine Particulate Matter (PM₁₀)

PM₁₀ emissions from IDEX rotary pyrolysis kiln (Process A) shall not exceed 6.19 pounds per hour, based on a maximum throughput of 4.0 tons per hour. PM₁₀ emissions from borings and turnings rotary kiln and H Line hammermill (Process G) shall not exceed 2.58 pounds per hour, based on a maximum throughput of 0.5 tons per hour. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.4 Particulate Matter

Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter emissions from the IDEX rotary pyrolysis kiln (Process A) shall not exceed 6.19 pounds per hour, and particulate matter emissions from the borings and turnings rotary kiln and H Line hammermill (Process G) shall not exceed 2.58 pounds per hour.

Testing Requirements [326 IAC 2-8-4(3)]

D.1.5 Afterburner - Process A Only

The permittee shall perform compliance stack tests for VOC and CO emissions from the Process A afterburner using a method acceptable to the OAM. These tests shall be performed within 180 days of startup of the unit and repeated no less than every five (5) years thereafter.

D.1.6 Particulate Matter - Process A Only

The Permittee shall conduct stack testing for PM and PM₁₀ (filterable and condensable) from the Process A baghouse utilizing methods acceptable to the Commissioner. The initial test shall be used to establish a ratio between PM and PM₁₀ and future tests shall be for PM₁₀ only. Unless the two (2) particulate fractions are such that PM = PM₁₀ then a test for PM only shall be considered acceptable for future compliance demonstrations. These tests shall be performed within 180 days of startup of production of the IDEX rotary kiln and repeated no less than every five (5) years thereafter.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.1.7 Afterburners

The natural gas fired afterburners at IDEX rotary pyrolysis kiln (Process A) and the borings and turnings rotary kiln (Process G) shall be in operation at all times that these units are in operation. When operating, the afterburners shall maintain a minimum operating temperature of 1,400°F, or the temperature determined in the most recent compliance tests to maintain at least 90 percent destruction of VOC captured. The temperature of the exhaust from the afterburner for Process A shall be recorded continuously whenever the facility is operating. The temperature of the exhaust from the afterburner for Process G shall be recorded on an hourly basis whenever the facility is operating. In the event of malfunction of the temperature recorder, to the extent practicable, intermittent monitoring of the parameter shall be implemented at intervals no less than one hour until such time as the continuous monitor is back in operation.

D.1.8 Preventive Maintenance [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for this facility.

D.1.9 Preventive Inspections

The following inspections shall be performed when the baghouses are operating in accordance with the Preventive Maintenance Plan prepared pursuant to Condition B.13:

Daily:

- a) Adequate dust removal from hoppers
- b) Monitoring of bag cleaning cycle

Weekly:

- a) Bag cleaning mechanisms
- b) Condition of the ductwork

Monthly:

- a) Internal inspection for air leaks
- b) Bag condition
- c) Fan condition and operation

D.1.10 Pressure Readings

The Permittee shall take pressure readings from each baghouse system at least once per shift when the IDEX rotary pyrolysis kiln (Process A) and the borings and turnings rotary kiln (Process G) are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop for the IDEX rotary pyrolysis kiln (Process A) for each compartment and for the unit shall be maintained within the range of 1.0 and 6.0 inches of water and the pressure drop for the borings and turnings rotary kiln (Process G) shall be maintained within the range of 3.0 and 6.0 inches of water. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for more than two consecutive readings.

The instrument used for determining the pressure shall comply with condition C.11 - Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every three (3) months.

D.1.11 Daily Visible Emissions Notations

Daily visible emission notations from the IDEX rotary pyrolysis kiln (Process A) and the borings and turnings rotary kiln (Process G) shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80 percent 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 month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.1.12 Baghouse Operations

The baghouses shall be in operation at all times that the IDEX rotary pyrolysis kiln (Process A) and the borings and turnings rotary kiln (Process G) are in operation.

D.1.13 Failure Detection

In the event that bag failure on the baghouse has been observed:

- a) The affected compartments shall be shut down immediately until the units have been repaired or replaced.
- b) Based upon the findings of the inspection, any additional corrective actions shall be devised within eight (8) hours of discovery and shall include a timetable for completion.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.14 Operational Parameters

The Permittee shall maintain records as necessary of normal operations as well as deviations from normal operations as defined in the Preventive Maintenance Plan.

D.1.15 Reporting

Any deviations noted as a result of operation conditions number D.1.7, D.1.10 and D.1.11 shall be reported in accordance with Condition B.15 and summarized in the annual certification submitted.

SECTION D.2 FACILITY OPERATION CONDITIONS

A/C Line hammermills, known as Process B, controlled by a baghouse with a flow rate of 4,300 actual cubic feet per minute, capacity: 1.7 tons per hour.

D Line hammermill, known as Process C, controlled by a baghouse with a flow rate of 4,000 actual cubic feet per minute, capacity: 0.85 tons per hour.

One (1) shredder/baler, known as Process D, controlled by a baghouse with a flow rate of 7,000 actual cubic feet per minute, capacity: 3.75 tons per hour.

One (1) aluminum blending mixer and bagger, known as Process E, controlled by a baghouse with a flow rate of 4,000 actual cubic feet per minute, capacity: 3.0 tons per hour.

One (1) aluminum blending and briquetting mixer, known as Process F, controlled by two (2) baghouses with flow rates of 4,600 actual cubic feet per minute and 1,880 actual cubic feet per minute, capacity: 5.0 tons per hour.

Emissions Limitations [326 IAC 2-8-4(1)]

D.2.1 Fine Particulate Matter (PM₁₀)

PM₁₀ emissions from the A/C Line hammermills (Process B) shall not exceed 4.25 pounds per hour, based on a maximum throughput of 1.7 tons per hour. PM₁₀ emissions from the D Line hammermill (Process C) shall not exceed 2.77 pounds per hour, based on a maximum throughput of 0.85 tons per hour. PM₁₀ emissions from the shredder/baler (Process D) shall not exceed 2.40 pounds per hour, based on a maximum throughput of 3.75 tons per hour. PM₁₀ emissions from the aluminum blending mixer and bagger (Process E) shall not exceed 1.37 pounds per hour, based on a maximum throughput of 3.0 tons per hour. PM₁₀ emissions from the aluminum blending and briquetting mixer (Process F) shall not exceed 2.06 pounds per hour, based on a maximum throughput of 5.0 tons per hour. Under the alternate operating scenario, PM₁₀ emissions from the A/C Line hammermills (Process B) shall not exceed 5.84 pounds per hour for a maximum of 2,675 hours in 1997, based on a maximum throughput of 1.7 tons per hour. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.2.2 Particulate Matter

Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter emissions the A/C Line hammermills (Process B) shall not exceed 4.25 pounds per hour (or 5.84 pounds per hour for a maximum of 2,674 hours under the alternate operation scenario), particulate matter emissions from the D Line hammermill (Process C) shall not exceed 2.77 pounds per hour, the particulate matter emissions from the shredder/baler (Process D) shall not exceed 2.40 pounds per hour, the particulate matter emissions from the aluminum blending mixer and bagger (Process E) shall not exceed 1.37 pounds per hour, and the particulate matter emissions from the aluminum blending and briquetting mixer (Process F) shall not exceed 2.05 pounds per hour.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.2.3 Preventive Maintenance [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for this facility.

D.2.4 Preventive Inspections

The following inspections shall be performed when the baghouses are operating in accordance with the Preventive Maintenance Plan prepared pursuant to Condition B.13:

Daily:

- a) Adequate dust removal from hoppers
- b) Monitoring of bag cleaning cycle

Weekly:

- a) Bag cleaning mechanisms
- b) Condition of the ductwork

Monthly:

- a) Internal inspection for air leaks
- b) Bag condition
- c) Fan condition and operation

D.2.5 Pressure Readings

The Permittee shall take pressure readings from each baghouse system at least once per shift when the A/C Line hammermills (Process B), the D Line hammermill (Process C), the shredder/baler (Process D), the aluminum blending mixer and bagger (Process E), and the aluminum blending and briquetting mixer (Process F) are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop for each baghouse in Processes B, D, E and F shall be maintained within the range of 1.0 and 8.0 inches of water. The pressure drop for the baghouse in Process C shall be maintained within the range of 1.0 to 6.0 inches of water. The Preventive Maintenance Plan for these unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for more than two consecutive readings.

The instrument used for determining the pressure shall comply with condition C.11 - Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every three (3) months.

D.2.6 Daily Visible Emissions Notations

Daily visible emission notations from the A/C Line hammermills (Process B), the D Line hammermill (Process C), the shredder/baler (Process D), the aluminum blending mixer and bagger (Process E), and the aluminum blending and briquetting mixer (Process F) shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80 percent 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 month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.2.7 Baghouse Operations

The baghouses shall be in operation at all times that the A/C Line hammermills (Process B), the D Line hammermill (Process C), the shredder/baler (Process D), the aluminum blending mixer and bagger (Process E), and the aluminum blending and briquetting mixer (Process F) are in operation.

D.2.8 Failure Detection

In the event that bag failure on the baghouse has been observed:

- a) The affected compartments shall be shut down immediately until the units have been repaired or replaced.
- b) Based upon the findings of the inspection, any additional corrective actions shall be devised within eight (8) hours of discovery and shall include a timetable for completion.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.2.9 Operational Parameters

The Permittee shall maintain records as necessary of normal operations as well as deviations from normal operations as defined in the Preventive Maintenance Plan. This shall include the number of hours of operation under the alternate operation scenario.

D.2.10 Reporting

Any deviations noted as a result of operation conditions number D.2.5 and D.2.6 shall be reported in accordance with Condition B.15 and summarized in the annual certification submitted.

SECTION D.3 FACILITY OPERATION CONDITIONS

Sixteen (16) charring ovens, known as Process H, controlled by one (1) venturi scrubber with a flow rate of 11,000 actual cubic feet per minute and two (2) wet packed towers with flow rates of 18,000 actual cubic feet per minute and 14,000 actual cubic feet per minute, capacity: 1.4 tons per hour for 6,567 hours. This item is the Alternate Operation Scenario, 1997 only.

Emissions Limitations [326 IAC 2-8-4(1)]

D.3.1 Fine Particulate Matter (PM₁₀)

PM₁₀ emissions from the sixteen (16) charring ovens (Process H) shall not exceed 5.1 pounds per hour for a maximum of 6,567 expected hours of operation in 1997, based upon a maximum throughput of 1,008 tons per month. Furthermore, operations of the charring ovens shall not operate concurrently with operations of the IDEX rotary pyrolysis kiln. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.3.2 Particulate Matter

Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter emissions from the sixteen (16) charring ovens (Process H) shall not exceed 5.1 pounds per hour.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.3.3 Preventive Maintenance [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for this facility.

D.3.4 Preventive Inspections

Preventive inspections shall be performed when the cyclonic wet scrubber and wet packed towers are operating in accordance with the Preventive Maintenance Plan prepared pursuant to Condition B.13.

D.3.5 Pressure Readings

The Permittee shall take pressure readings from each scrubber system at least once per shift when the sixteen (16) charring ovens (Process H) are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop for each compartment and for the unit shall be maintained within the range of 3.0 and 6.0 inches of water. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for more than two consecutive readings.

The instrument used for determining the pressure shall comply with condition C.11 - Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every three (3) months.

D.3.6 Daily Visible Emissions Notations

Daily visible emission notations from the sixteen (16) charring ovens (Process H) shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80 percent 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 month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.3.7 Scrubber Operations

The scrubbers shall be in operation at all times that the sixteen (16) charring ovens (Process H) are in operation.

D.3.8 Failure Detection

In the event that a failure of the scrubber has been observed:

- a) The affected unit(s) shall be shut down immediately until they have been repaired or replaced.
- b) Based upon the findings of the inspection, any additional corrective actions shall be devised within eight (8) hours of discovery and shall include a timetable for completion.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.3.9 Operational Parameters

The Permittee shall maintain records as necessary of normal operations as well as deviations from normal operations as defined in the Preventive Maintenance Plan. This shall include the number of hours of operation under the alternate operation scenario.

D.3.10 Reporting

Any deviations noted as a result of operation conditions number D.3.5 and D.3.6 shall be reported in accordance with Condition B.15 and summarized in the annual certification submitted.

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR MANAGEMENT**

**U.S. Granules Corporation
1433 Western Avenue
Plymouth, Indiana 46563**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F 099-5463-00015	
Original Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: December 11, 1996
First Significant Permit Modification: SMF099-8121	Pages affected: 21, 22, 23, 24, 25, 26, 27, 28
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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

Second Addendum to the
Technical Support Document for
Federally Enforceable State Operating Permit (FESOP)

**U.S. Granules Corporation
1433 Western Avenue
Plymouth, Indiana 46563**

**F-099-5463-00015
SMF 099-8121**

This Permit was issued on December 11, 1996. On January 16, 1997 and February 5, 1997, U.S. Granules Corporation requested changes to the permit. The following changes were agreed to and made as the First Significant Modification to this source:

- 1) The IDEX kiln will not be operational at the time originally intended, therefore, more than 2,675 hours of operation of charring ovens will be required. The charring ovens shall operate at a reduced capacity, with a lower particulate emission rate for 6,567 hours.
- 2) Changed the parameters for the pressure drop for Section D.1.10 and D.2.5. The pressure drop range for processes A and C was changed to 1 inch to 6 inches of water. The pressure drop range for processes B, D, E, and F was changed to 1 inches to 8 inches of water.
- 3) Changed Condition D.1.6 to reflect that the tests shall be performed within 180 days of the date of startup of production of the IDEX rotary kiln and repeated no less than every five (5) years thereafter.
- 4) Changed Condition D.2.1 to read PM10 emissions from the shredder/baler (Process D) shall not exceed 2.40 pounds per hour, based on a maximum throughput of 3.75 pounds per hour. It previously stated 3.75 pounds per month.
- 5) Removed the continuous monitoring requirement for the borings and turnings rotary kiln (Process G) afterburner and allowed for the operator to record on an hourly basis the temperature of the exhaust on a temperature monitoring form while operating. There is currently no continuous monitor for this device but there is a temperature gauge which can be read and recorded manually by the operator.
- 6) Removed the parenthesized emission number limiting monthly emissions following an hourly emission limit.

**NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT**

Proposed Approval of a Federal Enforceable State Operating Permit
Significant Permit Modification

for U.S. Granules Corporation
in Marshall County

**FESOP No.: F 099-5463-00015
SMF 099-8121**

Notice is hereby given that the above-mentioned company, located at 1433 Western Avenue, Plymouth, Indiana 46563, has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Significant Permit Modification to its Federally Enforceable State Operating Permit (FESOP) for a secondary aluminum processing source. The modification is limited to an increase in operating hours with a lower particulate emission rate; a change in the pressure drop; a change in the time schedule for stack testing; a change in the maximum throughput; and a change in the monitoring requirements for the borings and turnings rotary kiln. There will be no change in the emissions.

Notice is hereby given that there will be a period of thirty (30) days from the date of publication of this notice during which any interested person may comment on why this proposed permit should or should not be issued. Appropriate comments should be related to any air quality issues, interpretation of the state and federal rules, calculations made, technical issues, or the effect that the operation of this source would have on any aggrieved individuals.

A copy of the application and proposed permit is available for examination at the Plymouth Public Library, 201 North Center Street, Plymouth, Indiana. All statements, along with supporting documentation, should be submitted in writing to the IDEM, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015. If adverse comments concerning the **air pollution impact** of this proposed source are received, together with a request for a public hearing, such a hearing may be held to give further consideration to this application.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the OAM, at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have fifteen (15) days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to Karen Purtell, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or by phone at 317-233-2803 or 1-800-451-6027 (ext 3-2803).

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

kjp

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

Addendum to the
Technical Support Document for Significant Modification to the
Federally Enforceable State Operating Permit (FESOP)

**U.S. Granules Corporation
1433 Western Avenue
Plymouth, Indiana 46563**

**F-099-5463-00015
SMF 099-8121**

This Permit was issued on December 11, 1996. On January 16, 1997 and February 5, 1997, U.S. Granules Corporation requested changes to the permit. On August 11, 1997, the Office of Air Management (OAM) had a notice published in the Plymouth Pilot News, Plymouth, Indiana, stating that U.S. Granules had requested a modification to their permit. The notice also stated that OAM proposed to issue this modification and provided information on how the public could review the proposed modification 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 modification should be issued as proposed.

On September 9, 1997, a concerned citizen of Plymouth, Indiana submitted a request for a public hearing for the proposed modification to the FESOP. The follow is the OAMs response to this request:

U. S. Granules has potential emissions of a single regulated pollutant greater than 250 tons per year. They elected to accept an operating permit with federally enforceable limits that restrict its potential emissions of each regulated pollutant to 99 tons per year. The permit containing these restrictions is a FESOP. The Office of Air Management issued the FESOP after it was determined that all state and federal requirements applying to U.S. Granules operations were satisfied.

The FESOP compiled information regarding U.S. Granules' emissions, applicable federal and state requirements and compliance status into one document. It did not allow for new construction or an increase in emissions. The FESOP also required more compliance monitoring for the source than in past permits. It contains compliance monitoring conditions requiring that the afterburners maintain a minimum operating temperature to ensure 90 percent destruction of Volatile Organic Compounds (VOCs) captured and that an operator record the temperature of the exhaust from the afterburner hourly. The FESOP also requires daily, weekly and monthly inspections of the baghouses including pressure drop readings once per shift of all baghouses and the scrubber. In addition, daily visible emissions notations are required of the baghouses and scrubber exhaust to ensure that the dust collection systems are operating properly at all times.

Another step taken to guard against a decline in the ambient air quality is the requirement that U.S. Granules perform stack tests for VOC, Carbon Monoxide (CO) and Particulate Matter (PM) emissions. The results of these emissions tests will be compared with the state and federal limits to which U.S. Granules must adhere. Should U.S. Granules exceed any of these limits, they would be required to make repairs and then perform mandatory retesting until they demonstrated compliance. Depending upon the nature of the violation and its severity, U.S. Granules would also face legal action should they fail any compliance test. Should you wish to review the results of any of these compliance tests they will be public records, available for viewing in the OAM's file room.

In addition to requiring U.S. Granules test their control equipment and conduct compliance monitoring, they are also required to prepare a preventive maintenance plan documenting how they will operate and maintain their operating equipment and pollution control equipment. The preventive maintenance plan will describe in detail the steps U.S. Granules will take to ensure that all their operating equipment and pollution control equipment is operating correctly. It will also address the steps U.S. Granules will take whenever a malfunction of this equipment occurs, or whenever any of the control equipment exceeds any monitored operating parameter. If anytime the OAM feels U.S. Granules is not maintaining their equipment properly or adhering to the conditions specified in the continuous compliance plan, a request may be made to U.S. Granules asking for a review/modification of the preventive maintenance plan. There is also a provision in the permit that requires the company to report any malfunction of their equipment that lasts more than one (1) hour. Should U.S. Granules fail to report a malfunction of their equipment, a violation of rule 326 IAC 1-6 would occur and could result in legal action being taken against the company. Although U.S. Granules is required to report these malfunctions to the OAM, it does not exempt the company from possible enforcement actions relating to the malfunction, or from violations of permit conditions which result from equipment malfunction.

The modification to the FESOP, for which the public hearing is requested, does not allow for any increase in emissions. The modification requested an extension for the time allowed to make the IDEX kiln operational, which in turn, requires an extension in the number of hours the charring ovens would operate. The construction of the IDEX kiln was permitted through construction permit number CP 099-4504, on August 15, 1995. The IDEX rotary kiln allowed the OAM to issue U.S. Granules a FESOP rather than a Title V permit. The original FESOP allowed for an alternate operating scenario involving the use of sixteen (16) charring ovens while the rotary kiln operations are placed into production. The original FESOP limited the operation of the charring ovens to 2,657 hours with a limited capacity of 3.4 tons per hour. The modification limits the operation of the charring ovens to 6,567 hours at a limited rated capacity of 1.4 tons per hour. The alternate operating scenario is for 1997 only. Additionally, compliance monitoring conditions were adjusted to more accurately represent U.S. Granules current operating conditions.

As a final safeguard to ensure that U.S. Granules is complying with the FESOP conditions, the OAM will conduct unannounced inspections of their operations. These inspections are done periodically throughout the year and may be initiated in response to complaints by concerned citizens.