

**CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT**

**Hudson Foods - Ramsey Feed Mill
State Road 64
Ramsey, Indiana 47166**

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-061-9167-00010	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY 4

A.1 General Information 4

A.2 Emission Units and Pollution Control Equipment Summary 4

A.3 Part 70 Permit Applicability 4

SECTION B GENERAL CONDITIONS 5

B.1 General Construction Conditions 5

B.2 Effective of the Permit [IC13-15-5-3] 5

B.3 Revocation of Permits [326 IAC 2-1-9(b)] 5

B.4 Permit Review Rules [326 IAC 2] 5

B.5 First Time Operation Permit [326 IAC 2-1-4] 5

B.6 General Operation Conditions 6

B.7 Preventive Maintenance Plan [326 IAC 1-6-3] 6

B.8 Malfunctions Report [326 IAC 1-6-2] 6

B.9 Transfer of Permit [326 IAC 2-1-6] 7

B.10 Permit Revocation [326 IAC 2-1-9] 7

B.11 Availability of Permit [326 IAC 2-1-3(l)] 7

SECTION C SOURCE OPERATION CONDITIONS 8

Emission Limitations and Standards [326 IAC 2-8-4(1)]

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21] 8

C.2 Opacity [326 IAC 5-1] 8

C.3 Fugitive Dust Emissions [326 IAC 6-4] 8

C.4 Operation of Equipment [326 IAC 2-7-6(6)] 8

C.5 Stack Height [326 IAC 1-7] 8

C.6 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1] 8

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)] 8&9

C.8 Monitoring Methods [326 IAC 3] 9

C.9 Pressure Gauge Specifications 9

C.10 Visible Emission Notations 9

C.11 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140] 9&10

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

C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)] 10&11

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

C.13 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)] 11&12

C.14 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)] 12&13

Stratospheric Ozone Protection

C.15 Compliance with 40 CFR 82 and 326 IAC 22-1 13

SECTION D.1 FACILITY OPERATION CONDITIONS

animal feed mill 14

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 PM Process Operation [326 IAC 6-3] 14
D.1.2 Preventative Maintenance Plan [326 IAC 1-6-3] 14

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-8-5(1)] 14

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.4 Particulate Matter (PM Visible Emissions)
14
D.1.5 Particulate Matter (PM) 15
D.1.6 Visible Emissions Notations
.15
D.1.7 Baghouse Inspection
.15
D.1.8 Broken Bag or Failure Detection
15

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements 15 & 16

Malfunction Report 17&18

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates an animal feed mill operation which involves preparation of corn feed.

Responsible Official: Rick Amos
Source Address: State Road 64, Ramsey, Indiana
Mailing Address: P.O. Box 430, Corydon, Indiana 47112
SIC Code: 2048
County Location: Harrison
County Status: Attainment for all criteria pollutants
Source Status: Minor Source, under Part 70 Permit Program
Minor Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) 25 ton/hr hammermill which is controlled by an existing baghouse, designated as unit 2B and exhausts to a stack designated as 02.
- (b) One (1) 60 ton/hr pellet mill, designated as unit 3A and will replace a 40 ton/hr existing pellet mill.
- (c) One (1) 60 ton/hr pellet cooler, designated as unit 3B, will replace a 40 ton/hr existing pellet cooler, is controlled by existing multiple cyclones and exhausts to a stack, designated as 03.
- (d) One (1) existing receiving unit with an increase of 27.95 ton/hr and designated as unit 1.
- (e) One (1) existing pelletized feed distributor with an increase of 10 ton/hr, designated as unit 4 and exhausts to a stack designated as 04.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This existing source, including the emissions from this permit **CP-061-9167-00010**, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

SECTION B GENERAL CONSTRUCTION AND OPERATION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.4]

B.1 General Construction Conditions

- (a) The data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).
- (b) This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.3 Revocation of Permits [326 IAC 2-1-9(b)]

Pursuant to 326 IAC 2-1-9(b)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.4 Permit Review Rules [326 IAC 2]

Notwithstanding Operation Condition No. B.11, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 First Time Operation Permit [326 IAC 2-1-4]

This document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1-7.1 (Fees).

Operation Conditions

B.6 General Operation Conditions

- (a) The data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).
- (b) The Permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC13-17) and the rules promulgated thereunder.

B.7. Preventive Maintenance Plan [326 IAC 1-6-3]

Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:

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

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

B.8 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

B.9 Transfer of Permit [326 IAC 2-1-6]

Pursuant to 326 IAC 2-1-6 (Transfer of Permits):

- (a) In the event that ownership of this animal feed mill operation which prepares corn feed is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.
- (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.
- (c) The OAM shall reserve the right to issue a new permit.

B.10 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

B.11 Availability of Permit [326 IAC 2-1-3(l)]

Pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of the source and shall make this permit available for inspection by the IDEM, or other public official having jurisdiction.

Entire Source

Emission Limitation and Standards

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

The total source potential emissions of particulate matter (PM) are less than 250 tons per year and it is not one of the 28 listed source categories. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Opacity Limitations [326 IAC 5-1-2]

Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

C.3 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.4 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit shall be in placed or operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

C.5 Stack Height [326 IAC 1-7]

- (a) The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- (b) Any change in an applicable stack shall require prior approval from IDEM, OAM.

C.6 Asbestos Abatement Projects -Accreditation[326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

Compliance Monitoring Requirements

C.7 Compliance Monitoring

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

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

in writing, no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

C.8 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.9 Pressure Gauge Specifications

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.

C.10 Visible Emission Notations

That visible emission notations of all exhaust to the atmosphere from the baghouses and cyclones shall be performed once per working shift. A trained employee will record whether emissions are normal or abnormal.

- (a) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, 80% of the time, the process is in operation, not counting start up or shut down time.
- (b) In the case of batch or discontinuous operation, readings shall be taken during that part of the operation specified in the facility's specific condition prescribing visible emissions.
- (c) 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 and abnormal visible emissions for that specific process.
- (d) The Preventive Maintenance Plan for this facility shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

C.11 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (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
 - (3) 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 Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the 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 mandatory 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.

C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]

- (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. This compliance monitoring plan is comprised of:
 - (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, OAM upon request and shall be subject to review and approval by IDEM, OAM. 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) Response steps that will 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 such 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, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. 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 or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned 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.

Record Keeping and Reporting Requirements

C.13 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Performance Testing. All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is

not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.14 General Record Keeping Requirements

- (a) Records of all required monitoring data 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 and available within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

Stratospheric Ozone Protection

C.15 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.

- (a) One (1) 25 ton/hr hammermill which is controlled by an existing baghouse, designated as unit 2B and exhausts to a stack designated as 02.
- (b) One (1) 60 ton/hr pellet mill, designated as unit 3A and will replace a 40 ton/hr existing pellet mill.
- (c) One (1) 60 ton/hr pellet cooler, designated as unit 3B, will replace a 40 ton/hr existing pellet cooler, is controlled by existing multiple cyclones and exhausts to a stack designated as 03.
- (d) One (1) existing receiving unit with an increase of 27.95 ton/hr and designated as unit 1.
- (e) One (1) existing pelletized feed distributor with an increase of 10 ton/hr, designated as unit 4 and exhausts to a stack designated as 04.

Emissions Limitation and Standards

D.1.1 PM Process Operations (326 IAC 6-3):

Pursuant to 326 IAC 6-3 (Process Operations), the following facilities shall have a PM allowable emissions using the following equation:

$$E = (55.0 * P^{0.11}) - 40$$

Where: E = PM allowable emissions in pounds hour

P = Process weight rate in tons per hour

Since the allowable emissions, determined from 326 IAC 6-3, are higher than the Title V threshold, the allowable emissions shall be truncated to the potential emissions of 11.52 pounds per hour.

D.1.2 Preventive Maintenance Plan

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of the construction permit, is required for this facility and its control device.

Compliance Determination Requirements

D.1.3 Testing Requirements

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

Compliance Monitoring Requirements

D.1.4 Particulate Matter (PM Visible Emissions)

— That particulate matter (PM) emissions shall be in compliance to the following:

- (a) good housekeeping and equipment maintenance procedures are implemented.
- (b) emissions are minimized in receiving, handling, and shipping operations by appropriate methods. These may include but need not be limited to, dust collection systems, windscreens, baffles, restricted hopper openings, enclosed transfer points, flexible drop spouts and/or sleeves,

- (c) no visible accumulation of particulate matter beyond the plant property line, and
- (d) emissions do not violate 326 IAC 6-4 (Fugitive Dust Emissions).

D.1.5 Particulate Matter (PM)

The Baghouses for PM control shall be in operation at all times when the hammermills and feed distributor are in operation and exhausting to the outside atmosphere.

D.1.6 Visible Emissions Notations

- (a) Daily visible emission notations of the hammermills and feed distributor stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the hammermills and feed distributor. All defective bags shall be replaced.

D.1.8 Broken Bag or Failure Detection

In the event that bag failure has been observed:

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

Record Keeping Requirement

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, D.1.6, D.1.7, and D.1.8, the Permittee shall maintain records of the results of the inspections required under Condition D.1.1, D.1.6, D.1.7, and D.1.8.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements.

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967**

326 IAC 1-6-1 Applicability of rule

Sec. 1. The requirements of this rule (326 IAC 1-6) shall apply to the owner or operator of any facility which has the potential to emit twenty-five (25) pounds per hour of particulates, one hundred (100) pounds per hour of volatile organic compounds or SO₂, or two thousand (2,000) pounds per hour of any other pollutant; or to the owner or operator of any facility with emission control equipment which suffers a malfunction that causes emissions in excess of the applicable limitation.

326 IAC 1-2-39 “Malfunction” definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. (Air Pollution Control Board; 326 IAC 1-2-39; filed Mar 10, 1988, 1:20 p.m. : 11 IR 2373)

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name: Hudson Foods - Ramsey Feed Mill
 Source Location: State Road 64, Ramsey, Indiana 47166
 County: Harrison
 Construction Permit No.: CP-061-9167-00010
 SIC Code: 2048
 Permit Reviewer: Nysa L. James

The Office of Air Management (OAM) has reviewed an application from Hudson Foods - Ramsey Feed Mill relating to the construction and operation of an animal feed mill operation which involves preparation of corn feed, consisting of the following equipment:

- (a) One (1) 25 ton/hr hammermill which is controlled by an existing baghouse, designated as unit 2B and exhausts to a stack designated as 02.
- (b) One (1) 60 ton/hr pellet mill, designated as unit 3A and will replace a 40 ton/hr existing pellet mill.
- (c) One (1) 60 ton/hr pellet cooler, designated as unit 3B, will replace a 40 ton/hr existing pellet cooler, is controlled by existing multiple cyclones and exhausts to a stack, designated as 03.
- (d) One (1) existing receiving unit with an increase of 27.95 ton/hr and designated as unit 1.
- (e) One (1) existing pelletized feed distributor with an increase of 10 ton/hr, designated as unit 4 and exhausts to a stack designated as 04.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
02	hammermill	138.5	21	1050	ambient
03	pellet cooler	28	2.5x4.0	20,000	120
04	shipping	138.5	1.0	1050	ambient

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 30, 1997, with additional information received on December 22, 1997.

Emissions Calculations

See Appendix A (Emissions Calculations) for detailed calculations (two (2) pages).

Total Potential and Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	50.46	50.46
Particulate Matter (PM10)	21.24	21.24
Sulfur Dioxide (SO ₂)	--	--
Volatile Organic Compounds (VOC)	--	--
Carbon Monoxide (CO)	--	--
Nitrogen Oxides (NO _x)	--	--
Single Hazardous Air Pollutant (HAP)	--	--
Combination of HAPs	--	--

- (a) Allowable emissions are determined from the applicability of rule 326 IAC 6-3.
 $E = (55.0 * P^{0.11}) - 40$; where E = rate of emissions in lb/hr
 P = process weight in tons/hr.

This source is in compliance with 326 IAC 6-3-2 (process operations) before controls.

- (b) The potential emissions before control are less than the allowable emissions, therefore, the potential emissions before control are used for the permitting determination.
- (c) Allowable emissions (as defined in the Indiana Rule) of PM are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

County Attainment Status

- (a) Volatile organic compounds (VOC) and are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Harrison County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Harrison County has been classified as attainment or unclassifiable for NO_x, CO, PM,

and SO₂. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	2.45
PM10	0.399
SO ₂	6.315
VOC	0.034
CO	0.131
NO _x	0.642

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on Operating Permit OP-31-05-92-0069, issued on July 20, 1989.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	50.46	21.24	0.00	0.00	0.00	0.00
PSD or Offset Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit **CP-061-9167-00010**, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and

- (c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAM inspector assigned to the source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) 40 CFR Part 60 applicable to the source.
- (b) 40 CFR Part 60 Subpart DD (grain elevators) does not apply to the source because the storage capacity of corn is less than 2.5 million bushels.
- (c) There are no NESHAP 40 CFR Part 63 applicable to these facilities.

State Rule Applicability

326 IAC 5-1-2 (Opacity Limitations):

Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

326 IAC 6-3-2(c) (Process Operations):

Pursuant to 326 IAC 6-3 (Process Operations):

- (a) The baghouses and cyclones for particulate matter control shall be in operation at all times when the hammermills, pellet cooler and pellet distributor are in operation.
- (b) The facilities shall comply with 326 IAC 6-3-2(c) using the following equation:

$$E = 55.0 * P^{0.11} - 40 \quad \text{where: } E = \text{rate of emission in pounds per hour,}$$

P = process weight in tons per hour

Since the allowable emissions, determined from 326 IAC 6-3, are higher than the Title V threshold, the allowable emissions shall be truncated to the potential emissions of 11.52 pounds per hour.

- (c) Daily inspections shall be performed to verify the placement, integrity and particulate loading of the baghouses.
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (e) The Permittee shall take readings of the total static pressure drop across the baghouses,

at least once a week. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 1 and 4 inches of water. The Preventive Maintenance Plan for these baghouses shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading.

- (f) The instrument used for determining the pressure shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.
- (g) The gauge employed to take the pressure drop across the baghouses or any part of the facility shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within $\pm 2\%$ of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.
- (h) An inspection shall be performed each calendar quarter of all the baghouses. Defective bags shall be replaced. A record shall be kept of the results of the inspection and the number of bags replaced.
- (i) In the event that a bag's failure has been observed:
 - 1. The affected compartments will be shut down immediately until the failed units have been replaced.
 - 2. Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.
- (j) That visible emission notations of all exhaust to the atmosphere from the baghouses shall be performed once per working shift. A trained employee will record whether emissions are normal or abnormal.
 - 1. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, 80% of the time, the process is in operation, not counting start up or shut down time.
 - 2. In the case of batch or discontinuous operation, readings shall be taken during that part of the operation specified in the facility's specific condition prescribing visible emissions.
 - 3. 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 and abnormal visible emissions for that specific process.
 - 4. The Preventive Maintenance Plan for this facility shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
- (k) Particulate Matter Limitations:

That particulate matter (PM) emissions shall be considered in compliance provided that:

 - 1. good housekeeping and equipment maintenance procedures are implemented.

2. emissions are minimized in receiving, handling, and shipping operations by appropriate methods. These may include but need not be limited to, dust collection systems, windscreens, baffles, restricted hopper openings, enclosed transfer points, flexible drop spouts and/or sleeves,
3. no visible accumulation of particulate matter beyond the plant property line, and
4. emissions do not violate 326 IAC 6-4 (Fugitive Dust Emissions).

The source is in compliance with 326 IAC 6-3-2 because of the baghouses and cyclones utilized for control purposes.

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

- (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM and OAM upon request and shall be subject to review and approval by IDEM and OAM.

No 326 IAC 8 rules apply because there are no VOC emissions.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. 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) Construction Permit Application Form Y.

- (a) None of these listed air toxics will be emitted from this proposed construction.
- (b) 326 IAC 2-1-3.4 does not apply to the source because there are no HAPs emitted.

Conclusion

The construction of this animal feed mill will be subject to the conditions of the attached proposed **Construction Permit No. CP-061-9167-00010.**

EMISSION CALCULATIONS:

Hudson PM emissions are determined from the following:

- (a) increase in throughput for the grain receiving process.
- (b) a second hammermill with a 25 ton/hr capacity.
- (c) increase of 20 ton/hr for the existing pellet mill capacity.
- (d) increase of 20 ton/hr for the existing pellet cooler capacity.
- (e) increase of 10 ton/hr for the shipping process.

The existing dryer which is rated at 3600 bushels per hour, boiler rated at 90.4 GPH of propane will remain the same.

1. **Receiving Operation:**

Total Particulate Emissions:

88,000 ton/yr (increase) * yr/ 3148 hrs = 27.95 ton/hr.
27.95 ton/hr * 0.15 (emission factor) lb/ton = 4.19 lb/hr.
4.19 lb/hr * (8760 hr/yr) * (1 ton/ 2000 lb) = 18.37 ton/yr.

PM10 Emissions:

27.95 ton/hr * 0.0375 (emission factor) lb/ton = 1.05 lb/hr.
1.05 lb/hr * (8760 hr/yr) * (1 ton/ 2000 lb) = 4.59 ton/yr.

2. **Shipping Operation:**

Total Particulate Emissions:

87,600 ton/yr (increase) * yr/ 8760 hrs = 10 ton/hr.
10 ton/hr * 0.01 (emission factor) lb/ton = 0.1 lb/hr.
0.1 lb/hr * (8760 hr/yr) * (1 ton/ 2000 lb) = 0.438 ton/yr.

PM10 Emissions:

10 ton/hr * 0.0075 (emission factor) lb/ton = 0.075 lb/hr.
0.075 lb/hr * (8760 hr/yr) * (1 ton/ 2000 lb) = 0.328 ton/yr.

3. **Pellet Mill Operation:**

Total Particulate Matter Emissions: This is limited to the hammermill throughput of 50 ton/hr.

4. **Hammermill Operation:**

Total Particulate Matter Emissions:

25 ton/yr * 0.009 (emission factor) lb/ton = 0.225 lb/hr.
0.225 lb/hr * (8760 hr/yr) * (1 ton/ 2000 lb) = 0.99 ton/yr.

PM10 Emissions:

25 ton/yr * 0.009 (emission factor) lb/ton = 0.225 lb/hr.
0.225 lb/hr * (8760 hr/yr) * (1 ton/ 2000 lb) = 0.99 ton/yr.

5. **Pellet Cooler Operation:**

Total Particulate Emissions: This is limited to the hammermill throughput of 50 ton/hr.
 $50 \text{ ton/hr} * 0.14 \text{ (emission factor) lb/ton} = 7 \text{ lb/hr.}$
 $7 \text{ lb/hr} * (8760 \text{ hr/yr}) * (1 \text{ ton/ } 2000 \text{ lb}) = 30.66 \text{ ton/yr.}$

PM10 Emissions:
 $50 \text{ ton/hr} * 0.07 \text{ (emission factor) lb/ton} = 3.5 \text{ lb/hr.}$
 $3.5 \text{ lb/hr} * (8760 \text{ hr/yr}) * (1 \text{ ton/ } 2000 \text{ lb}) = 15.33 \text{ ton/yr.}$

EMISSION CALCULATIONS CONTINUED:

Total Particulate emissions = receiving emissions + shipping emissions + grinding emissions + pellet cooler = $18.37 \text{ ton/yr} + 0.438 \text{ ton/yr} + 0.99 \text{ ton/yr} + 30.66 \text{ ton/yr} = \mathbf{50.46 \text{ ton/yr.}}$

PM10 emissions = $4.59 \text{ ton/yr} + 0.328 \text{ ton/yr} + 0.99 \text{ ton/yr} + 15.33 \text{ ton/yr} = \mathbf{21.24 \text{ ton/yr.}}$

Appendix A: Emissions Calculations

Grain Processing Operations

Company Name: Hudson Foods - Ramsey Feed Mill
Address City IN Zip: P.O. Box 430, Corydon, IN> 47112
CP: 061-9167
Plt ID: 061-00010
Reviewer: NLJ
Date: 11/20/97

ACTUAL HOURS OF OPERATION	
Hours per day:	8
Days per week:	5
Weeks per year:	52
HOURS PER YEAR:	3148

BUSHEL PER YEAR	
Corn:	15557758.57
Bean:	
Wheat:	

GRAIN RECEIVED		
Corn (bu/hr)	Bean (bu/hr)	Wheat (bu/hr)
4942.1088215	0	0
56 lb/bu	56 lb/bu	60 lb/bu
Corn (lb/hr)	Bean (lb/hr)	Wheat (lb/hr)
276758.094	0	0
Corn (ton/hr)	Bean (ton/hr)	Wheat (ton/hr)
138.379047	0	0
GRAIN THROUGHPUT (TON/HR)		
138.379047001		

	PARTICULATE MATTER				
	Receiving	Shipping	Handling	Grinding Hammermilling	Pellet Cooler
Emission Factor in lb/ton	0.15	0.011	0.088	0.009	0.14
Potential Emissions in lb/hr	20.76	1.52	12.18	1.25	19.37
Potential Emissions in lb/day	498.16	36.53	292.26	29.89	464.95
Potential Emissions in ton/yr	90.92	6.67	53.34	5.45	84.85

Methodology

Emission factors are from AP 42 Table 9.9.1-2 and Table 9.9.1-3 Total Particulate Emission Factors for Uncontrolled Grain Processing Operations

Grain Throughput (ton/hr) = Grain received (bu/hr)*Weight of Bushel (lb/bu)*ton/2000 lb

Potential Emissions in lb/hr = Throughput (ton/hr)*EF (lb/ton)

Potential Emissions in lb/day = PE (lb/hr) * 24 hours/day

Potential Emissions in ton/yr = PE (lb/day) * 365 (days/year) /2000 (lbs/ton)

**Appendix A: Emissions Calculations
Grain Processing Operations**

Company Name: Hudson Foods - Ramsey Feed Mill
Address City IN Zip: P.O. Box 430, Corydon, IN. 47112
CP: 061-91167
Plt ID: 061-00010
Reviewer: NLJ
Date: 11/19/97

ACTUAL HOURS OF OPERATION	
Hours per day:	1
Days per week:	1
Weeks per year:	1
HOURS PER YEAR:	3148

BUSHEL PER YEAR	
Corn:	3127142.86
Bean:	
Wheat:	

GRAIN RECEIVED		
Corn (bu/hr)	Bean (bu/hr)	Wheat (bu/hr)
993.37	0	0
56 lb/bu	56 lb/bu	60 lb/bu
Corn (lb/hr)	Bean (lb/hr)	Wheat (lb/hr)
55628.97	0	0
Corn (ton/hr)	Bean (ton/hr)	Wheat (ton/hr)
27.81	0	0
GRAIN THROUGHPUT (TON/HR)		
27.81		

	PARTICULATE MATTER				
	Receiving	Shipping	Handling	Grinding Hammermilling	Pellet Cooler
Emission Factor in lb/ton	0.15	0.01	0.088	0.009	0.14
Potential Emissions in lb/hr	4.17	0.31	2.45	0.25	3.89
Potential Emissions in lb/day	100.13	7.34	58.74	6.01	93.46
Potential Emissions in ton/yr	18.27	1.34	10.72	1.10	17.06

Methodology

Emission factors are from AP 42 Table 9.9.1-2 and Table 9.9.1-3 Total Particulate Emission Factors for Uncontrolled Grain Processing Operations
 Grain Throughput (ton/hr) = Grain received (bu/hr)*Weight of Bushel (lb/bu)*ton/2000 lb
 Potential Emissions in lb/hr = Throughput (ton/hr) * EF (lb/ton)
 Potential Emissions in lb/day = PE (lb/hr) * 24 hours/day
 Potential Emissions in ton/yr = PE (lb/day) * 365 (days/year)/2000 (lb/ton)

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for New Construction and Operation

Source Name: Hudson Foods - Ramsey Feed Mill
Source Location: State Road 64, Ramsey, Indiana 47166
County: Harrison
Construction Permit No.: CP-061-9167-00010
SIC Code: 2048
Permit Reviewer: Nysa L. James

On February 11, 1998, the Office of Air Management (OAM) had a notice published in the Corydon Democrat, Corydon, Indiana, stating that Hudson Foods - Ramsey Feed Mill had applied for a construction permit to construct and operate an animal feed mill operation which involves preparation of corn feed, with control. The notice also stated that OAM 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.

On March 17, 1998, OAM determined that the following changes to the proposed construction permit are required:

1. The pressured drop range of the baghouses does not need to be recorded because the requirements of 326 IAC 6-3 have been satisfied by baghouse inspections and broken bag or failure detections. The technical support document lists both ways to demonstrate compliance. The source needs only to record and inspect one of the two listed in the technical support document.
2. Section D.1.9, Record Keeping Condition has been amended as follows to include the requirements of other specified conditions (changes are bolded for emphasis):

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, **D.1.6, D.1.7, and D.1.8** the Permittee shall maintain records of the results of the inspections required under Condition D.1.1, **D.1.6, D.1.7, and D.1.8**.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements.