

Ms. Rechelle Kruse, Air Pollution Control Engineer  
IBP, Inc.  
P.O. Box 515  
Dakota City, NE 68731

Dear Ms Kruse:

Re: Exempt Construction and Operation Status,  
**CP 017-9422-00034**

The application from IBP, Inc. received on January 28, 1998, has been reviewed. Based on the data submitted and the provisions in Sections 1 and 2 of 326 IAC 2-1, it has been determined that the construction and operation of equipment to combust landfill gas (in addition to the natural gas and propane previously permitted in CP 017-4534) in Boiler #1 at the meat packing plant located at highway 35 and 25 Bypass in Logansport, Indiana, is classified as exempt from air pollution permit requirements.

The following conditions shall be applicable:

1. Opacity Limitations  
That 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.
2. Fugitive Dust Emissions  
That pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), the permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)].
3. Open Burning  
That 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.
4. PM emissions (326 IAC 6-2-4)  
That pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), total particulate matter emissions from all the combustion units shall not exceed 0.275 pounds per million British thermal units.
5. NSPS (40 CFR 60.48c)
  - (a) The permittee shall submit notification of the date of construction, anticipated startup, and actual startup. The notification shall include:

- (i) The design heat input of the affected facility and identification of fuels to be combusted in the affected facility.
  - (ii) The annual capacity factor at which the permittee anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
- (b) The permittee shall record and maintain records of the amounts of each fuel combusted during each month. All records shall be maintained by the permittee for a period of two years following the date of such record.

This existing source has submitted their Part 70 application (T-017-7369-00034) on December 5, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Any change or modification which may increase the potential carbon monoxide emissions to 125 pounds per day or more from the equipment covered in this exemption must be approved by the Office of Air Management (OAM) before such change may occur.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

kvr

cc: File - Cass County  
Cass County Health Department  
Air Compliance - Ryan Hillman  
Permit Tracking - Janet Mobley  
Air Programs Section- Nancy Landau  
TV File - T-017-7369-00034

## Indiana Department of Environmental Management (IDEM) Office of Air Management

### Technical Support Document (TSD) for Exempted Emission Units

#### Source Background and Description

Source Name: IBP, Inc.  
 Source Location: Highway 35 and 25 Bypass, Logansport IN 46947  
 County: Cass  
 Construction Permit No.: CP-017-9422-00034  
 SIC Code: 2011  
 Permit Reviewer: Keshav Reddy

The Office of Air Management (OAM) has reviewed an application from IBP, Inc. relating to the construction and operation of equipment to combust landfill gas (in addition to natural gas and propane previously permitted in CP 017-4534) in Boiler # 1.

#### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
B1	Boilers	60	4	60,000	460

#### 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 January 28, 1998, with additional information received on April 14, 1998.

#### Emissions Calculations

See Appendix for emissions calculations

#### 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)	0.0	0.0
Particulate Matter (PM10)	0.0	0.0
Sulfur Dioxide (SO <sub>2</sub> )	0.07	0.07
Volatile Organic Compounds (VOC)	3.56	3.56
Carbon Monoxide (CO)	21.74	21.74
Nitrogen Oxides (NO <sub>x</sub> )	0.0	0.0
Single Hazardous Air Pollutant (HAP)	0	0
Combination of HAPs	0	0

The potential emissions before control are less than the allowable emissions, therefore, the potential emissions before control are used for the permitting determination. Allowable emissions (as defined in the Indiana Rule) of carbon monoxide are less than 25 tons per year. Carbon Monoxide emissions are 4.96 lbs/hr or 119 lbs/day, less than 25 lbs/hr or 125 lbs/day, therefore the construction and operation of the above said equipment is considered exempt from the construction permit requirements.

### County Attainment Status

Cass County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T-017-7369-00034) application on December 5, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

### Federal Rule Applicability

NSPS (326 IAC 12, 40 CFR Part 60)

Combustion of landfill gas in addition to natural gas and propane causes an increase in SO<sub>2</sub>, VOC and CO emissions as shown in page 2 of the appendix. This change in the method of operation is considered a modification as defined in 40 CFR 60.2. The modification will commence after June 9, 1989 and has a maximum design capacity of > 10 mmBtu/hr and < 100 mmBtu/hr. Hence 40 CFR Part 60, subpart Dc applies. As the fuel combusted is neither wood, coal, nor distillate oil, only the reporting and recordkeeping requirements of 60.48c apply.

NESHAPS (40 CFR Part 63)

There are no National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63) applicable to this facility.

### **State Rule Applicability**

#### **326 IAC 6-2-4**

The particulate matter emission limitation does not apply to the modification as there is no increase in PM emissions from this modification. As addressed in the TSD of CP 017-4534, the PM emissions from the sources of indirect heating at the source are 2.76 lbs/hr, which are less than 54.45 lbs/hr (PM emission limit for 198 mmBtu/hr total heat input).

#### **326 IAC 8-1-6**

VOC emissions from the proposed modification are less than 25 tons/yr. Therefore, rule 326 IAC 8-1-6 does not apply to the modification.

#### **326 IAC 9-1**

The rule 326 IAC 9 does not apply to the modification as meat packing plant is not one of the sources covered by this rule

### **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. None of these listed air toxics will be emitted from this proposed construction.

### **Conclusion**

The construction and operation of equipment to combust landfill gas in addition to natural gas and propane in Boiler # 1 will be subject to the conditions of the attached proposed **Exemption No. CP-017-9422-00034**.