

**CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT**

**IBP, Inc.
Highway 35 and 25 Bypass
Logansport IN 46947**

is hereby authorized to construct

1. Singer #2 (7 mmBtu/hr natural gas fired combustion unit)
 2. Air make up units listed below (fired by natural gas or propane)
- | Location | ID | Heat Input Rate (mmBtu/hr) |
|------------------|----------|----------------------------|
| Cut Floor | MAU-C-1 | 9.00 |
| Cut Floor | MAU-C-2 | 9.00 |
| Edible Rendering | MAU-ER-1 | 2.40 |
| Kill Floor | MAU-K-1 | 7.68 |
| Kill Floor | MAU-K-2 | 7.68 |
| Kill Floor | MAU-K-3 | 7.68 |
| Kill Floor | MAU-K-4 | 7.92 |
| Skinning | MAU-K-5 | 3.84 |
| Stun & Bleed | MAU-K-6 | 8.16 |
| Crowd Pen | MAU-K-7 | 0.46 |
| Chits/Casings | MAU-CH-1 | 3.00 |
| Hides | MAU-H-1 | 3.84 |

and the equipment listed in the Page 2 of this permit.

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-017-9481-00034	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

This permit supersedes the permit CP 017-4534 issued on April 29, 1996

Location	ID	Heat Input Rate (mmBtu/hr)
Maintenance	MAU-M-1	3.48
Engine Room	MAU-E-1	2.40
Cafeteria	HVA-7	0.50
Classroom/Meeting	HVA-8	0.20
Support QC	HVA-9	0.07
Welfare Office Lab	HVA-11	0.23
New Womens Locker Room	HVA-23	0.19
New Mens Locker Room	HVA-24	0.40
Cafeteria	HVA-25	0.50

3. Vaporizer #1 (3 mmBtu/hr natural gas fired combustion unit)
4. Flare #1 (3.5 mmBtu/hr propane fired combustion unit)
5. Replacement of #6 fuel oil with propane as an additional fuel to fire the existing two - 50 mmBtu/hr boilers identified as Boilers #1 & 2
6. Usage of Propane as an additional fuel to fire all the natural gas fired combustion units

and to OPERATE the following existing equipment

1. Two 50 mmBtu/hr boilers identified as Boilers #1 & 2
2. Singer #1 (7 mmBtu/hr natural gas fired combustion unit)
3. Dupps blood ring dryer (3 mmBtu/hr natural gas fired combustion unit)
4. Air make up units (fired by natural gas or propane)

Location	ID	Heat Input Rate (mmBtu/hr)
Inedible Rendering	MAU-IR-1	3.73
Inedible Rendering	MAU-IR-2	2.99
Womens Locker Room	HVA-15	0.50
Mens Locker Room	HVA-12	0.40
Mens Locker Room	HVA-13	0.95
Kitchen	HVA-16	0.70
USDA	HVA-3	0.16

5. Main inedible system with a max. finished product rate of 13,400 pounds per hour
6. Hair system with a max. finished product rate of 2,025 pounds per hour
7. Blood system with a max. finished product rate of 2,625 pounds per hour
8. Edible rendering system with a max. finished product rate of 21,373 pounds per hour
9. Spray Tower
10. Baghouse controlling particulate emissions from the blood silo

Construction Conditions

General Construction Conditions

1. That 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).
2. That 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.

Effective Date of the Permit

3. That pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.
4. That 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.
5. That notwithstanding Construction Condition No. 6, 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).

Operation Permit

6. That this document shall also become an operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:
 - (a) An 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).
 - (e) The Permittee has submitted their Part 70 application T017-7369-00034 on December 5, 1996 for the existing source. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

7. That when the facility is constructed and placed into operation the following operation conditions shall be met:

Operation Conditions

General Operation Conditions

1. That 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).
2. That 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 (IC 13-17) and the rules promulgated thereunder.

Preventive Maintenance Plan

3. That 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.

Transfer of Permit

4. That pursuant to 326 IAC 2-1-6 (Transfer of Permits):
 - (a) In the event that ownership of this meat packing and rendering plant 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.

Permit Revocation

5. That 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).

Availability of Permit

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

Malfunction Condition

7. That pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction), a record of all malfunctions which result in violations of the Office of Air Management Rules shall be kept for a period of three (3) years and made available to the Office of Air Management (OAM) upon request. Pursuant to 326 IAC 1-2-39 (Malfunction Definition), a malfunction is defined as any sudden unavoidable failure of any air pollution control equipment, process or combustion or process equipment. When a malfunction resulting in a limit or parameter deviation occurs that lasts in excess of one (1) hour, notification of the condition shall be made to OAM no later than four (4) daytime business hours after the occurrence.

Opacity Limitations

8. 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.

Particulate Matter Limitation

9. 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 of heat input.

Particulate Matter Limitation

10. That particulate matter emissions shall be considered in compliance with 326 IAC 6-3 provided that the maximum particulate emissions from:

- a) the edible rendering process shall not exceed 19.9 pounds per hour.
- b) the blood system shall not exceed 10.6 pounds per hour
- c) the main inedible process shall not exceed 17.6 pounds per hour
- d) the floatation system shall not exceed 8.7 pounds per hour

Baghouse Operating Condition

11. That the owner or operator shall operate the baghouses in the following manner to comply with rule 326 IAC 2-1-3(i)(8) :

- a) the baghouse is operated at all times the pork packaging plant is in operation in a pressure drop range recommended by the manufacturer.
- b) That a visual inspection shall be performed inside the baghouse once per week to determine if any of the bags are faulty. If needed, the bags shall be replaced within 24 hours.

Air Contaminants

12. That pursuant to 326 IAC 2-1-3(i)(8), the owner or operator shall operate the facilities in the following manner to minimize air contaminants:

- a) Precautions in operation of process equipment shall be taken to minimize overheating and burning of inedible rendering material.
- b) Cleaning of inedible rendering equipment and areas shall be done every operational day.
- c) The air from the room holding inedible rendering equipment shall be vented out through six roof vents and scrubbed with water using fine mist atomizing spray nozzles. A minimum of one spray nozzle will be used per vent. The spray nozzle will be installed within 180 days of permit issuance. The atomizing spray nozzles will be used as needed to minimize air contaminants from these roof vents, and only when the ambient temperature is above a temperature which will prevent the water spray from freezing.
- d) The emissions from the major inedible rendering equipment shall be vented through the spray tower and scrubbed with water. The spray tower nozzle configuration provides six rows of spray nozzles with three nozzles per row. The spray tower shall operate at all times the rendering equipment is in operation. Within 180 days of permit issuance, the permittee shall conduct a performance test to measure optimum pressure drop across the spray tower and water flow to the spray tower. After completion of the performance test, the permittee will monitor these parameters once a day. If the monitored pressure drop value is not within '+ or -' 2 inches of water of the performance test value, the permittee shall take action to investigate and remedy the cause of the value.

- e) Depending on the effectiveness in controlling air contaminants, the spray tower shall be upgraded using appropriate available and cost-effective technology such as fine spray atomized nozzles and nozzle configurations, etc.
- f) Good housekeeping practices shall be followed when performing inedible rendering operations.

Record keeping

13. That records of conditions 11, 12(b), 12(c) and 12(d) shall be maintained for a minimum period of twenty-four months and be made available to the OAM upon request. These records shall include all times that process and control equipment are not operating satisfactorily including the dates, duration, causes and corrective actions taken.

MALFUNCTION REPORT

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

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE: IT HAS POTENTIAL TO EMIT 25 LBS/HR PARTICULATES ? _____, 100 LBS/HR VOC ? _____, 100 LBS/HR SULFUR DIOXIDE ? _____ OR 2000 LBS/HR OF ANY OTHER POLLUTANT ? _____ EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____ / ____ / 19 ____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____ / ____ / 19 ____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

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 for New Construction and Operation

Source Name: IBP, Inc.
Source Location: Highway 35 and 25 Bypass, Logansport IN 46947
County: Cass
Construction Permit No.: CP-017-9481-00034
SIC Code: 2011
Permit Reviewer: Keshav Reddy

IBP, Inc. was issued a permit (CP-017-4534) on April 29, 1996 for construction and operation of meat packaging and rendering operations at their facility in Logansport. The issued permit was appealed by IBP with the Office of Environmental Adjudication and requests for changes in the permit were made with OAM. In an effort to address the issues appealed, further review and study was done by OAM, IDEM. The changes in the permit terms and conditions mainly pertain to administrative changes in the text of the permit and operational practices of the plant. Some conditions were also added to the permit which explicitly spell out applicable rules to the source, without imposing any new requirements. There are no increase in emissions due to these changes. This permit is being reissued to accommodate changes to the original permit. The emission estimates, regulatory and technical review done during the issuance of the previous permit are still applicable to this permit. The proposed revised permit is being public noticed to provide an opportunity for the citizens, industry and other concerned party to comment on the proposed reissuance. The following are the changes:

1. The item # 4, "Dupps blood ring dryer (3mmBtu/hr natural-gas fired combustion unit)", shall be delisted from 'to construct' section on Page 1 of the permit and shall be listed in 'to operate' section on page 2 of the permit.
2. Items listed as numbers 4,5,6 and7 in section 'to operate' on page 2 of the permit are revised and shall be read as follows respectively:
 5. Main inedible system with a maximum finished product rate of 13,400 pounds per hour.
 6. Hair system with a maximum finished product rate of 2,025 pounds per hour.
 7. Blood system with a maximum finished product rate of 2,625 pounds per hour.
 8. Edible rendering system with a maximum finished product rate of 21,373 pounds per hour.
3. Item # 8 in 'to operate' section on page 2 of the permit is revised and shall be read as follows:
 9. Spray Tower
4. Operation Condition # 7 of the original permit has been revised to read as follows in condition 11 of the revised permit:

That the owner or operator shall operate the baghouse in the following manner to comply with rule 326 IAC 2-1-3(i)(8) :

- a) the baghouse is operated at all times the pork packaging plant is in operation in a pressure drop range recommended by the manufacturer.
- b) That a visual inspection shall be performed inside the baghouse once per week to determine if any of the bags are faulty. If needed, the bags shall be replaced within 24 hours.

5. Operation Condition # 8 of the permit has been revised to read as follows in condition 12 of the revised permit:

That pursuant to 326 IAC 2-1-3(i)(8), the owner or operator shall operate the facilities in the following manner to minimize air contaminants:

- a) Precautions in operation of process equipment shall be taken to minimize overheating and burning of inedible rendering material.
 - b) Cleaning of inedible rendering equipment and areas shall be done every operational day.
 - c) The air from the room holding inedible rendering equipment shall be vented out through six roof vents and scrubbed with water using fine mist atomizing spray nozzles. A minimum of one spray nozzle will be used per vent. The spray nozzle will be installed within 180 days of permit issuance. The atomizing spray nozzles will be used as needed to minimize air contaminants from these roof vents, and only when the ambient temperature is above a temperature which will prevent the water spray from freezing.
 - d) The emissions from the major inedible rendering equipment shall be vented through the spray tower and scrubbed with water. The spray tower nozzle configuration provides six rows of spray nozzles with three nozzles per row. The spray tower shall operate at all times the rendering equipment is in operation. Within 180 days of permit issuance, the permittee shall conduct a performance test to measure optimum pressure drop across the spray tower and water flow to the spray tower. After completion of the performance test, the permittee will monitor these parameters once a day. If the monitored pressure drop value is not within '+' or '-' 2 inches of water of the performance test value, the permittee shall take action to investigate and remedy the cause of the value.
 - e) Depending on the effectiveness in controlling air contaminants, the spray tower shall be upgraded using appropriate available and cost-effective technology such as fine spray atomized nozzles and nozzle configurations, etc.
 - f) Good housekeeping practices shall be followed when performing inedible rendering operations.
6. Operation Condition #9 has been revised to read as follows in condition 13 of the revised permit: That records of conditions 11, 12(b), 12(c) and 12(d) shall be maintained for a minimum period of twenty-four months and be made available to the OAM upon request. These records shall include all times that process and control equipment are not operating satisfactorily including the dates, duration, causes and corrective actions taken.
7. New conditions were added regarding Preventive Maintenance Plan (326 IAC 1-6-3), Transfer of permit (326 IAC 2-1-6), Permit revocation (326 IAC 2-1-9), and Availability of Permit (326 IAC 2-1-3 (i)). These standard conditions, which are put forth in all new construction permits issued by OAM currently, were added to explicitly spell out some general rules applicable to this source.