



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Part 70 Operating Permit
for Naturally Recycled Proteins of Indiana, LLC in Blackford County
Part 70 Operating Permit Renewal No.: T009-42446-00025

The Indiana Department of Environmental Management (IDEM) has received an application from Naturally Recycled Proteins of Indiana, LLC located at 4 McGeath Blvd Montpelier, Indiana 47359 for a renewal of its Part 70 Operating Permit issued on January 5, 2016. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Naturally Recycled Proteins of Indiana, LLC to continue to operate its existing source.

This draft permit does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

A copy of the permit application and IDEM's preliminary findings have been sent to:

Montpelier-Harrison Township Public Library
301 S Main St
Montpelier, IN 47359

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM's website (<https://www.in.gov/idem/5474.htm>) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so

that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number T009-42446-00025 in all correspondence.

Comments should be sent to:

Tessa Dedek
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Tessa Dedek
Or dial directly: (317) 234-5402
Fax: (317) 232-6749 attn: Tessa Dedek
E-mail: tdedek@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above and will also be sent to the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Tessa Dedek of my staff at the above address.



Heath Hartley, Section Chief
Permits Branch
Office of Air Quality



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

DRAFT

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Naturally Recycled Proteins of Indiana, LLC
4 McGeath Blvd
Montpelier, Indiana 47359**

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

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

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

Operation Permit No.: T009-42446-00025	
Master Agency Interest ID: 101435	
Issued by:	Issuance Date:
Heath Hartley, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary pet food flavoring manufacturing facility.

Source Address:	4 McGeath Blvd, Montpelier, Indiana 47359
General Source Phone Number:	(608) 274-2921
SIC Code:	2047
County Location:	Blackford
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) Three (3) hammermills, identified below, each using a baghouse to control particulate emissions, and exhausting indoors.
 - (1) Two (2) Solid Raw Material Hammermills, identified as EP3-1 and EP3-2, constructed in 2011 and modified in 2016, each with a maximum capacity of 6.0 tons of solid raw material per hour, each using a baghouse to control particulate emissions, and exhausting indoors.
 - (2) One (1) Dried Product Hammermill, identified as EP3-3, constructed in 2011 and modified in 2016, with a maximum capacity of 18.0 tons of dried product per hour, with particulate emissions controlled by a baghouse, and exhausting indoors.
- (b) Three (3) direct, natural gas-fired product dryers, identified below, each with a maximum input capacity of 8.1 tons per hour wet material received from the blender, each with a maximum output capacity of 6.0 tons per hour dried material, each with a maximum heat input capacity of 15 MMBtu/hr, and using no control.
 - (1) One (1) direct, natural gas-fired Product Dryer, identified as EP1, constructed in 2011, and exhausting through stack EP-1.
 - (2) One (1) direct, natural gas-fired Product Dryer, identified as EP2, constructed in 2011, and exhausting through stack EP-2.
 - (3) One (1) direct, natural gas-fired Product Dryer, identified as EP4, constructed in 2016, and exhausting through stacks EP-4a and EP-4b.
- (c) Three direct, natural gas-fired make-up air units, identified below, each with a maximum

heat input capacity of 10.5 MMBtu/hr, each using no control, and exhausting indoors.

- (1) One (1) Dryer Room Make-Up Air Unit, constructed in 2017.
- (2) Two (2) AbsolutAire Centrifugal SWSI Make-Up Air Units, constructed in 2017, located in the second dryer room.

A.3 Specifically Regulated Insignificant Activities
 [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Material handling, as follows:

Emission Unit ID	Capacity (ton/hr)	Exhaust Location
Truck Receiving of Solid Raw Materials	12	Indoors
Solid Raw Material Storage Bins (12), tote fed or bulk fed via conveyors	12	Indoors
Conveyance of Solid Material	12	Indoors
Enclosed Solid Material Mixer	12	Indoors
Mixed Material Blenders (3)	24.3	Indoors
Finished Dried Product Storage Bins (108), elevator/auger fed	18	Indoors
Finished Product Load-Out	18	Indoors

- (b) Thirteen (13) Raw Product Liquid Storage Tanks for storage of stabilized poultry soluble, constructed in 2011, vented, and exhausting indoors.
- (c) Miscellaneous natural gas-fired combustion units with heat input equal to or less than ten million (10,000,000) Btu per hour, as follows:

Emission Unit ID	Year Constructed	Capacity (MMBtu/hr)
Hi-Efficiency Furnace (Office)	2011	0.135
Water Heater (Office)	2011	0.050
Tanker Bay Radiant Heaters (4)	2011	0.400 (combined)
Tank Area Radiant Heaters (4)	2011	0.600 (combined)
Hotsy Model 1835 (Plant)	2011	0.558
Hi-Efficiency Furnace (Truck Bldg Office)	2011	0.135
Water Heater (Truck Bldg Office)	2011	0.050
Shop Radiant Heaters (2)	2011	0.500 (combined)
Hotsy Model 1835 (Shop)	2011	0.558

- (d) Unpaved roads for material receiving and product shipping.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other

air filtration equipment.

- (f) Blowdown for compressors and pumps.
- (g) Emissions for a laboratory as defined in 326 IAC 2-7-1(21)(D).

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

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T009-42446-00025, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

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

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance

causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

- (A) A description of the emergency;

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable

requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T009-42446-00025 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

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

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit. 326 IAC 9-1-2 is not federally enforceable.

C.5 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.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(c).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.7 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

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

- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);
or

- (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 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 applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Three (3) hammermills, identified below, each using a baghouse to control particulate emissions, and exhausting indoors.
 - (1) Two (2) Solid Raw Material Hammermills, identified as EP3-1 and EP3-2, constructed in 2011 and modified in 2016, each with a maximum capacity of 6.0 tons of solid raw material per hour, each using a baghouse to control particulate emissions, and exhausting indoors.
 - (2) One (1) Dried Product Hammermill, identified as EP3-3, constructed in 2011 and modified in 2016, with a maximum capacity of 18.0 tons of dried product per hour, with particulate emissions controlled by a baghouse, and exhausting indoors.
- (b) Three (3) direct, natural gas-fired product dryers, identified below, each with a maximum input capacity of 8.1 tons per hour wet material received from the blender, each with a maximum output capacity of 6.0 tons per hour dried material, each with a maximum heat input capacity of 15 MMBtu/hr, and using no control.
 - (1) One (1) direct, natural gas-fired Product Dryer, identified as EP1, constructed in 2011, and exhausting through stack EP-1.
 - (2) One (1) direct, natural gas-fired Product Dryer, identified as EP2, constructed in 2011, and exhausting through stack EP-2.
 - (3) One (1) direct, natural gas-fired Product Dryer, identified as EP4, constructed in 2016, and exhausting through stacks EP-4a and EP-4b.

- (a) Material handling, as follows:

Emission Unit ID	Capacity (ton/hr)	Exhaust Location
Truck Receiving of Solid Raw Materials	12	Indoors
Solid Raw Material Storage Bins (12), tote fed or bulk fed via conveyors	12	Indoors
Conveyance of Solid Material	12	Indoors
Enclosed Solid Material Mixer	12	Indoors
Mixed Material Blenders (3)	24.3	Indoors
Finished Dried Product Storage Bins (108), elevator/auger fed	18	Indoors
Finished Product Load-Out	18	Indoors

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

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

D.1.1 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

Emissions Unit	PM Emission Limit (lb/hr)	PM10 Emission Limit (lb/hr)
Solid Raw Material Hammermill EP3-1	4.45	3.17
Solid Raw Material Hammermill EP3-2	4.45	3.17
Dried Product Hammermill EP3-3	13.30	9.51

Compliance with these limits, combined with the potential to emit PM and PM10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM and PM10 to less than two hundred fifty (250) tons per twelve (12) consecutive month period, each, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from these units shall each not exceed the allowable emission rate as listed in the table below:

Emission Unit	P (ton/hr)	E (lb/hr)
Solid Raw Material Hammermill EP3-1	6	13.62
Solid Raw Material Hammermill EP3-2	6	13.62
Dried Product Hammermill EP3-3	18	28.43
Product Dryer EP1	6	13.62
Product Dryer EP2	6	13.62
Product Dryer EP4	6	13.62
Conveyance of Solid Material	12	21.67
Enclosed Solid Material Mixer	12	21.67

The pound per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and } P = \text{process weight rate in tons per hour}$$

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plans required by this condition.

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

D.1.4 Particulate Control

- (a) In order to assure compliance with Condition D.1.1, the baghouses for particulate control shall be in operation and control emissions from two (2) solid raw material hammermills (EP3-1 and EP3-2), and the dried product hammermill (EP3-3), at all times the units are

in operation.

- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.1.5 Parametric Monitoring

In order to demonstrate the compliance status with Condition D.1.1, the Permittee shall record the pressure drop across each baghouse at least once per day when the associated hammermill unit is in operation. When, for any one reading, the pressure drop across a baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for these units is a pressure drop between 0.3 and 5.0 inches of water, unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.1.6 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.1.7 Record Keeping Requirement

- (a) In order to document the compliance status with Condition D.1.4, the Permittee shall maintain daily records of pressure drop across the baghouses. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the record keeping required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(c) Miscellaneous natural gas-fired combustion units with heat input equal to or less than ten million (10,000,000) Btu per hour, as follows:

Emission Unit ID	Year Constructed	Capacity (MMBtu/hr)
Hi-Efficiency Furnace (Office)	2011	0.135
Water Heater (Office)	2011	0.050
Tanker Bay Radiant Heaters (4)	2011	0.400 (combined)
Tank Area Radiant Heaters (4)	2011	0.600 (combined)
Hotsy Model 1835 (Plant)	2011	0.558
Hi-Efficiency Furnace (Truck Bldg Office)	2011	0.135
Water Heater (Truck Bldg Office)	2011	0.050
Shop Radiant Heaters (2)	2011	0.500 (combined)
Hotsy Model 1835 (Shop)	2011	0.558

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

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

D.2.1 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

Emission Unit	Pt (lb/MMBtu)
Water Heater (Office)	0.60
Hotsy Model 1835 (Plant)	0.60
Water Heater (Truck Building Office)	0.60
Hotsy Model 1835 (Shop)	0.60

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plans required by this condition.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Naturally Recycled Proteins of Indiana, LLC
Source Address: 4 McGeath Blvd, Montpelier, Indiana 47359
Part 70 Permit No.: T009-42446-00025

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Naturally Recycled Proteins of Indiana, LLC
Source Address: 4 McGeath Blvd, Montpelier, Indiana 47359
Part 70 Permit No.: T009-42446-00025

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Naturally Recycled Proteins of Indiana, LLC
 Source Address: 4 McGeath Blvd, Montpelier, Indiana 47359
 Part 70 Permit No.: T009-42446-00025

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

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

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

Source Description and Location

Source Name: Naturally Recycled Proteins of Indiana, LLC
Source Location: 4 McGeath Blvd, Montpelier, Indiana 47359
County: Blackford
SIC Code: 2047 (Dog and Cat Food)
Permit Renewal No.: T009-42446-00025
Permit Reviewer: Tessa Dedek

On January 17, 2020, Naturally Recycled Proteins of Indiana, LLC submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Naturally Recycled Proteins of Indiana, LLC relating to the operation of a pet food flavoring manufacturing facility. Naturally Recycled Proteins of Indiana, LLC was issued its first Part 70 Operating Permit Renewal (T009-36059-00025) on January 5, 2016.

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T009-36059-00025 on January 5, 2016. The source has since received the following approvals:

Permit Type	Permit Number	Issuance Date
Significant Source Modification	009-36739-00025	June 1, 2016
Significant Permit Modification	009-36748-00025	June 23, 2016
Minor Source Modification	009-39244-00025	November 27, 2017
Minor Permit Modification	009-39305-00025	February 2, 2018

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) Three (3) hammermills, identified below, each using a baghouse to control particulate emissions, and exhausting indoors.
 - (1) Two (2) Solid Raw Material Hammermills, identified as EP3-1 and EP3-2, constructed in 2011 and modified in 2016, each with a maximum capacity of 6.0 tons of solid raw material per hour, each using a baghouse to control particulate emissions, and exhausting indoors.
 - (2) One (1) Dried Product Hammermill, identified as EP3-3, constructed in 2011 and modified in 2016, with a maximum capacity of 18.0 tons of dried product per hour, with particulate emissions controlled by a baghouse, and exhausting indoors.

- (b) Three (3) direct, natural gas-fired product dryers, identified below, each with a maximum input capacity of 8.1 tons per hour wet material received from the blender, each with a maximum output capacity of 6.0 tons per hour dried material, each with a maximum heat input capacity of 15 MMBtu/hr, and using no control.
 - (1) One (1) direct, natural gas-fired Product Dryer, identified as EP1, constructed in 2011, and exhausting through stack EP-1.
 - (2) One (1) direct, natural gas-fired Product Dryer, identified as EP2, constructed in 2011, and exhausting through stack EP-2.
 - (3) One (1) direct, natural gas-fired Product Dryer, identified as EP4, constructed in 2016, and exhausting through stacks EP-4a and EP-4b.
- (c) Three direct, natural gas-fired make-up air units, identified below, each with a maximum heat input capacity of 10.5 MMBtu/hr, each using no control, and exhausting indoors.
 - (1) One (1) Dryer Room Make-Up Air Unit, constructed in 2017.
 - (2) Two (2) AbsolutAire Centrifugal SWSI Make-Up Air Units, constructed in 2017, located in the second dryer room.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) Material handling, as follows:

Emission Unit ID	Capacity (ton/hr)	Exhaust Location
Truck Receiving of Solid Raw Materials	12	Indoors
Solid Raw Material Storage Bins (12), tote fed or bulk fed via conveyors	12	Indoors
Conveyance of Solid Material	12	Indoors
Enclosed Solid Material Mixer	12	Indoors
Mixed Material Blenders (3)	24.3	Indoors
Finished Dried Product Storage Bins (108), elevator/auger fed	18	Indoors
Finished Product Load-Out	18	Indoors

- (b) Thirteen (13) Raw Product Liquid Storage Tanks for storage of stabilized poultry soluble, constructed in 2011, vented, and exhausting indoors.
- (c) Miscellaneous natural gas-fired combustion units with heat input equal to or less than ten million (10,000,000) Btu per hour, as follows:

Emission Unit ID	Year Constructed	Capacity (MMBtu/hr)
Hi-Efficiency Furnace (Office)	2011	0.135
Water Heater (Office)	2011	0.050
Tanker Bay Radiant Heaters (4)	2011	0.400 (combined)
Tank Area Radiant Heaters (4)	2011	0.600 (combined)
Hotsy Model 1835 (Plant)	2011	0.558
Hi-Efficiency Furnace (Truck Bldg Office)	2011	0.135
Water Heater (Truck Bldg Office)	2011	0.050
Shop Radiant Heaters (2)	2011	0.500 (combined)
Hotsy Model 1835 (Shop)	2011	0.558

- (d) Unpaved roads for material receiving and product shipping.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Blowdown for compressors and pumps.
- (g) Emissions for a laboratory as defined in 326 IAC 2-7-1(21)(D).

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

County Attainment Status

The source is located in Blackford County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.
PM _{2.5}	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO ₂ standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

- (a) Ozone Standards
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Blackford County has been designated as

attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
Blackford County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
Blackford County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

	Unrestricted Potential Emissions (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Total PTE of Entire Source Excluding Fugitive Emissions*	310.12	259.26	242.37	0.20	34.13	64.12	28.67	0.61	0.64
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM_{2.5} listed is direct PM_{2.5}.
³Single highest source-wide HAP is hexane.
 *Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM₁₀ and PM_{2.5} is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

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

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Total PTE of Entire Source Excluding Fugitive Emissions*	249.68	249.85	242.37	0.20	34.13	64.12	28.67	0.61	0.64
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset Major Source Thresholds	---	NA	NA	NA	NA	NA	NA	NA	NA

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM_{2.5} listed is direct PM_{2.5}.
³Single highest source-wide HAP is hexane.
 *Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to take limit(s) in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-8 (FESOP), 326 IAC 2-2 (PSD), and 326 IAC 2-3 (Emission Offset), for more information regarding the limit(s).

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability

Federal rule applicability for this source has been reviewed as follows:

New Source Performance Standards (NSPS):

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for Water Heater (Office), Hotsy Model 1835 (Plant), Water Heater (Truck Building Office), and Hotsy Model 1835 (Shop), because these units have a maximum design heat input capacity of less than 10 MMBtu/hr.
- (b) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60, Subpart Kb and 326 IAC 12, are not included in the permit for the raw product liquid storage tanks, because these tanks are not used to store volatile organic liquids.
- (c) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD and 326 IAC 20-95, are not included in the permit for the space heaters, process heaters, and boilers, since these units are not located at or part of a major source of HAPs.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Sources: Prepared Feed Manufacturing, 40 CFR 63, Subpart DDDDDDD, are not included in the permit for this source, since feed produced for dogs and cats are not considered animal feed, as defined in 40 CFR 63.11627; therefore, this source is not a prepared feeds manufacturing facility.
- (c) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

Compliance Assurance Monitoring (CAM):

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.
- (b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

The following table is used to identify the applicability of CAM to each emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

Emission Unit/Pollutant	Control Device	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Solid Raw Material Hammermill EP3-1/PM	BH	326 IAC 2-2	<100	-	N ¹	N
Solid Raw Material Hammermill EP3-1/PM10	BH	326 IAC 2-2	<100	-	N ¹	N
Solid Raw Material Hammermill EP3-1/PM*	BH	326 IAC 6-3-2	<100	-	N ¹	N
Solid Raw Material Hammermill EP3-2/PM	BH	326 IAC 2-2	<100	-	N ¹	N
Solid Raw Material Hammermill EP3-2/PM10	BH	326 IAC 2-2	<100	-	N ¹	N
Solid Raw Material Hammermill EP3-2/PM*	BH	326 IAC 6-3-2	<100	-	N ¹	N
Dried Product Hammermill EP3-3/PM	BH	326 IAC 2-2	<100	-	N ¹	N
Dried Product Hammermill EP3-3/PM10	BH	326 IAC 2-2	<100	-	N ¹	N
Dried Product Hammermill EP3-3/PM*	BH	326 IAC 6-3-2	<100	-	N ¹	N
Under the Part 70 Permit program (40 CFR 70), PM is not a regulated air pollutant.						
Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for regulated air pollutants (PM10, PM2.5, SO2, NOx, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy.						
PM* For limitations under 326 IAC 6-3-2, 326 IAC 6.5, and 326 IAC 6.8, IDEM OAQ uses PM as a surrogate for the regulated air pollutant PM10. Therefore, uncontrolled PTE and controlled PTE reflect the emissions of the regulated air pollutant PM10.						
N ¹ CAM does not apply for PM because the uncontrolled PTE of PM is less than the major source threshold.						
Controls: BH = Baghouse, C = Cyclone, DC = Dust Collection System, RTO = Regenerative or Recuperative Thermal Oxidizer, WS = Wet Scrubber, ESP = Electrostatic Precipitator						
Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.						

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to any of the existing units as part of this Part 70 permit renewal.

State Rule Applicability - Entire Source

State rule applicability for this source has been reviewed as follows:

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

The source is subject to 326 IAC 1-6-3.

326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)

PSD and Emission Offset applicability is discussed under the Potential to Emit After Issuance section of this document.

PSD Minor Source Limits

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM and PM10 emissions from Solid Raw Material Hammermills EP3-1 and EP3-2 and Dried Product Hammermill EP3-3 shall not exceed the emissions limits listed in the table below:

Emissions Unit	PM Emission Limit (lb/hr)	PM10 Emission Limit (lb/hr)
Solid Raw Material Hammermill EP3-1	4.45	3.17
Solid Raw Material Hammermill EP3-2	4.45	3.17
Dried Product Hammermill EP3-3	13.30	9.51

Compliance with these limits, combined with the potential to emit PM and PM10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM and PM10 to less than two hundred fifty (250) tons per twelve (12) consecutive month period, each, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

The operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to the requirements of 326 IAC 2-6 (Emission Reporting), since it is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Pursuant to 326 IAC 2-6-3(a)(2), the Permittee shall submit triennially, by July 1, an emission statement covering the previous calendar year in accordance with the compliance schedule in 326 IAC 2-6-3. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)

The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1).

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

The source is subject to the requirements of 326 IAC 6-4, because the unpaved roads have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-1(a), this source (located in Blackford County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

Pursuant to 326 IAC 6.8-1-1(a), this source (located in Blackford County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

State rule applicability has been reviewed as follows:

Hammermills EP3-1, EP3-2, & EP3-3

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to Solid Raw Material Hammermills EP3-1 and EP3-2 and Dried Product Hammermill EP3-3 since each unit is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and since each unit is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from these units shall not exceed the allowable emission rates listed in the table below. The pound per hour limitation for each unit was interpolated from data for process weight rates of up to sixty thousand (60,000) pounds per hour using the following equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

Summary of Process Weight Rate Limits			
Emission Unit	P (ton/hr)	E (lb/hr)	Uncontrolled PTE of PM (lb/hr)
Solid Raw Material Hammermill EP3-1	6	13.62	7.20
Solid Raw Material Hammermill EP3-2	6	13.62	7.20
Dried Product Hammermill EP3-3	18	28.43	21.60

Based on calculations, the control equipment is not needed to comply with this limit.

Product Dryers EP1 , EP2, & EP4

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to Product Dryers EP1, EP2, and EP4, since each unit is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and since each unit is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from these units shall not exceed the allowable emission rates listed in the table below. The pound per hour limitation for each unit was interpolated from data for process weight rates of up to sixty thousand (60,000) pounds per hour using the following equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

Summary of Process Weight Rate Limits			
Emission Unit	P (ton/hr)	E (lb/hr)	Uncontrolled PTE of PM (lb/hr)
Product Dryer EP1	6	13.62	10.26
Product Dryer EP2	6	13.62	10.26
Product Dryer EP4	6	13.62	10.26

Based on the attached PTE calculations, none of the units above require control equipment to comply with the limits of 326 IAC 6-3-2.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

Product Dryers EP1, EP2, and EP4 are not subject to 326 IAC 326 IAC 7-1.1 because these units each have a potential to emit (or limited potential to emit) sulfur dioxide (SO₂) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though Product Dryers EP1, EP2, and EP4 were constructed after January 1, 1980, these units are not subject to the requirements of 326 IAC 8-1-6 because the unlimited VOC potential emissions from each unit are less than twenty-five (25) tons per year.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

The requirements of 326 IAC 9-1 do not apply to Product Dryers EP1, EP2, and EP4, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

The requirements of 326 IAC 10-3 do not apply to Product Dryers EP1, EP2, and EP4, since these units are not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Make-Up Air Units

326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-1(d), the Make-Up Air Units are not subject to the requirements of 326 IAC 6-2-4 since these units are not classified as indirect heating facilities, as defined in 326 IAC 1-2-19.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1.5(2), the Make-Up Air Units are not subject to the requirements of 326 IAC 6-3, since these units are not considered manufacturing processes.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

The Make-Up Air Units are not subject to 326 IAC 326 IAC 7-1.1 because the uncontrolled potential emissions of sulfur dioxide (SO₂) for each unit are less than 25 tons per year.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though each of the Make-Up Air Units were constructed after January 1, 1980, these units are not subject to the requirements of 326 IAC 8-1-6 because the unlimited VOC potential emissions from each unit are less than twenty-five (25) tons per year.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

The requirements of 326 IAC 9-1 do not apply to the Make-Up Air Units because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

The requirements of 326 IAC 10-3 do not apply to the Make-Up Air Units since none of the units are a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Material Handling

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

(a) Pursuant to 326 IAC 6-3-1(b)(14), the Truck Receiving of Solid Raw Material, Solid Raw Material Storage Bins, Mixed Material Blenders, Finished Dried Product Bins, and Finished Product Load-

Out are not subject to the requirements of 326 IAC 6-3, since these units each have potential emissions less than five hundred fifty one thousandths (0.551) pounds per hour.

- (b) Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the Conveyance of Solid Material and the Enclosed Solid Material Mixer, since each unit is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and since each unit is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from these units shall not exceed the allowable emission rates listed in the table below. The pound per hour limitation for each unit was interpolated from data for process weight rates of up to sixty thousand (60,000) pounds per hour using the following equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

Summary of Process Weight Rate Limits			
Emission Unit	P (ton/hr)	E (lb/hr)	Uncontrolled PTE of PM (lb/hr)
Conveyance of Solid Material	12	21.67	0.73
Enclosed Solid Material Mixer	12	21.67	0.73

Based on the attached PTE calculations, none of the units above require control equipment to comply with the limits of 326 IAC 6-3-2.

Raw Product Liquid Storage Tanks

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though the Raw Product Liquid Storage Tanks were constructed after January 1, 1980, these units are not subject to the requirements of 326 IAC 8-1-6 because these units do not produce measurable emissions.

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

The requirements of 326 IAC 8-4-3 apply to all petroleum liquid storage vessels with capacities greater than one hundred fifty thousand (150,000) liters (thirty-nine thousand (39,000) gallons) containing volatile organic compounds whose true vapor pressure is greater than 10.5 kPA (1.52 psi). Naturally Recycled Proteins of Indiana, LLC does not operate petroleum liquid storage vessels containing VOCs with capacities of thirty-nine thousand (39,000) gallons or greater. Therefore the requirements of 326 IAC 8-4-3 are not applicable and are not included in the permit.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The requirements of 326 IAC 8-9 are not applicable to the Raw Product Liquid Storage Tanks because the source (located in Blackford County) is not located in Clark, Floyd, Lake, or Porter Counties.

Miscellaneous Natural Gas Combustion

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

- (a) Pursuant to 326 IAC 6-2-1(d), the Hi-Efficiency Furnace (Office), Tanker Bay Radiant Heaters, Tank Area Radiant Heaters, Hi-Efficiency Furnace (Truck Bldg Office), and Shop Radiant Heaters are not subject to the requirements of 326 IAC 6-2-4 since these units are not classified as indirect heating facilities, as defined in 326 IAC 1-2-19.
- (b) Pursuant to 326 IAC 6-2-1(d), the Water Heater (Office), Hotsy Model 1835 (Plant), Water Heater (Truck Bldg Office), and Hotsy Model 1835 (Shop) are subject to the requirements of 326 IAC

6-2-4 because these units are indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).

Q = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation.

Indirect Heating Units Which Began Operation After September 21, 1983						
Facility	Construction Date (Removal Date)	Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)	Particulate Limitation, Pt (lb/MMBtu)	PM PTE based on AP-42 (lb/MMBtu)
Water Heater (Office)	2011	0.05	1.22	1.04	0.60	0.0019
Hotsy Model 1835 (Plant)		0.56		1.04		
Water Heater (Truck Bldg Office)		0.05		1.04		
Hotsy Model 1835 (Shop)		0.56		1.04		
Where: Q = Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed.						
Note: Emission units shown in strikethrough were subsequently removed from the source. The effect of removing these units on "Q" is shown in the year the boiler was removed.						

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Pursuant to 326 IAC 6-3-1.5(2), the Hi-Efficiency Furnace (Office), Tanker Bay Radiant Heaters, Tank Area Radiant Heaters, Hi-Efficiency Furnace (Truck Bldg Office), and Shop Radiant Heaters are not subject to the requirements of 326 IAC 6 3, since these units are not considered manufacturing processes.
- (b) Pursuant to 326 IAC 6-3-1(b)(1), the Water Heater (Office), Hotsy Model 1835 (Plant), Water Heater (Truck Bldg Office), and Hotsy Model 1835 (Shop) are not subject to the requirements of 326 IAC 6-3, since these units are classified as indirect heating units, as defined in 326 IAC 1-2-19.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

The miscellaneous natural gas combustion units are not subject to 326 IAC 326 IAC 7-1.1 because the uncontrolled potential emissions of sulfur dioxide (SO₂) for each unit are less than 25 tons per year.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though each of the miscellaneous natural gas combustion units were constructed after January 1, 1980, these units are not subject to the requirements of 326 IAC 8-1-6 because the unlimited VOC potential emissions from each unit are less than twenty-five (25) tons per year.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

The requirements of 326 IAC 9-1 do not apply to the miscellaneous natural gas combustion units because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

The requirements of 326 IAC 10-3 do not apply to the miscellaneous natural gas combustion units since none of the units are a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

(a) The Compliance Determination Requirements applicable to this source are as follows:

(1) Particulate Control

- (i) In order to assure compliance with Condition 326 IAC 2-2 (Prevention of Significant Deterioration), the baghouses for particulate control shall be in operation and control emissions from two (2) Solid Raw Material Hammermills (EP3-1 and EP3-2), and the Dried Product Hammermill (EP3-3), at all times the units are in operation.
- (ii) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) The Compliance Monitoring Requirements applicable to this source are as follows:

Summary of Monitoring Requirements			
Emission Unit	Type of Monitoring	Frequency	Range or Specification
Solid Raw Material Hammermill EP3-1	Pressure drop monitoring	Daily	Within normal range of 0.3 to 5.0 inches of water unless a different upper or lower value is established in the most recent compliant stack test
Solid Raw Material Hammermill EP3-2	Pressure drop monitoring	Daily	Within normal range of 0.3 to 5.0 inches of water unless a different upper or lower value is established in the most recent compliant stack test
Dried Product Hammermill EP3-3	Pressure drop monitoring	Daily	Within normal range of 0.3 to 5.0 inches of water unless a different upper or lower value is established in the most recent compliant stack test

These monitoring conditions are necessary because the baghouses for the Hammermills must operate properly to assure compliance with 326 IAC 2-2 (Prevention of Significant Deterioration).

Proposed Changes

As part of this permit approval, the permit may contain new or different permit conditions and some conditions from previously issued permits/approvals may have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes.

The following changes were made to conditions contained previously issued permits/approvals (these changes may include Title I changes):

- (1) IDEM OAQ has incorporated the applicable requirements of 326 IAC 6-2-4 into the permit for the Water Heater (Office), Hotsy Model 1835 (Plant), Water Heater (Truck Bldg Office), and Hotsy Model 1835 (Shop) since these units are indirect heating facilities.
- (2) IDEM OAQ has removed testing for Product Dryer EP4, former Condition D.1.5 from the permit, since the testing has been performed.
- (3) Section B - Annual Fee Payment of the permit has been revised as follows to include an updated phone number for the OAQ, Billing, Licensing, and Training Section.
- (4) Effective June 8, 2019, the requirements of 326 IAC 14-10 (Emission Standards for Asbestos Demolition and Renovation Operations) were amended. Based on the amended rule, Section C.6 - Asbestos Abatement Projects of the permit has been revised as follows:

Conclusion and Recommendation

Unless otherwise stated, information 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 17, 2020.

The operation of this pet food flavoring manufacturing facility shall be subject to the conditions of the attached proposed Part 70 Operating Permit Renewal No. T009-42446-00025.

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Tessa Dedek, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (800) 451-6027, and ask for Tessa Dedek or directly at (317) 234-5401.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations
PTE Summary**

Company Name: Naturally Recycled Proteins of Indiana, LLC
Source Address: 4 McGeath Blvd, Montpelier, IN 47359
Permit Number: 009-42446-00025
Reviewer: Tessa Dedek

Emission Unit	Uncontrolled Potential to Emit (tpy)							Highest Single HAP ²	Total HAPs
	PM	PM ₁₀	PM _{2.5} ¹	SO ₂	NO _x	VOC	CO		
Solid Raw Material Hammermill EP3-1	31.54	15.77	15.77	-	-	-	-	-	-
Solid Raw Material Hammermill EP3-2	31.54	15.77	15.77	-	-	-	-	-	-
Dried Product Hammermill EP3-3	94.61	47.30	47.30	-	-	-	-	-	-
Product Dryer EP1 ³	44.94	57.03	53.61	0.04	6.44	21.10	5.41	0.12	0.12
Product Dryer EP2 ³	44.94	57.03	53.61	0.04	6.44	21.10	5.41	0.12	0.12
Product Dryer EP4 ³	44.94	57.03	53.61	0.04	6.44	21.10	5.41	0.12	0.12
Material Handling	17.34	8.22	1.57	-	-	-	-	-	-
Miscellaneous Natural Gas Combustion	0.28	1.13	1.13	0.09	14.81	0.81	12.44	0.27	0.28
Total Excluding Fugitives:	310.12	259.26	242.37	0.20	34.13	64.12	28.67	0.61	0.64
<i>Fugitive Emissions⁴ (Unaved Roads)</i>	16.33	4.35	0.44	-	-	-	-	-	-
Total Fugitives:	16.33	4.35	0.44	-	-	-	-	-	-

Notes:

¹PM_{2.5} listed is direct PM_{2.5}.

²The highest single source-wide HAP is hexane.

³The dryer process emissions include the combustion emissions for particulate and VOC.

⁴Unpaved Road emissions are not included towards the determination of PSD, emission offset, and Part 70 Permit applicability.

Emission Unit	Potential to Emit after Issuance ¹ (tpy)							Highest Single HAP ³	Total HAPs
	PM	PM ₁₀	PM _{2.5} ²	SO ₂	NO _x	VOC	CO		
Solid Raw Material Hammermill EP3-1	19.49	13.88	15.77	-	-	-	-	-	-
Solid Raw Material Hammermill EP3-2	19.49	13.88	15.77	-	-	-	-	-	-
Dried Product Hammermill EP3-3	58.25	41.65	47.30	-	-	-	-	-	-
Product Dryer EP1 ⁴	44.94	57.03	53.61	0.04	6.44	21.10	5.41	0.12	0.12
Product Dryer EP2 ⁴	44.94	57.03	53.61	0.04	6.44	21.10	5.41	0.12	0.12
Product Dryer EP4 ⁴	44.94	57.03	53.61	0.04	6.44	21.10	5.41	0.12	0.12
Material Handling	17.34	8.22	1.57	-	-	-	-	-	-
Miscellaneous Natural Gas Combustion	0.28	1.13	1.13	0.09	14.81	0.81	12.44	0.27	0.28
Total Excluding Fugitives:	249.68	249.85	242.37	0.20	34.13	64.12	28.67	0.61	0.64
<i>Fugitive Emissions⁵ (Unaved Roads)</i>	16.33	4.35	0.44	-	-	-	-	-	-
Total Fugitives:	16.33	4.35	0.44	-	-	-	-	-	-

Notes:

¹The gray shaded cells indicate where limits are included.

²PM_{2.5} listed is direct PM_{2.5}.

³The highest single source-wide HAP is hexane.

⁴The dryer process emissions include the combustion emissions for particulate and VOC.

⁵Fugitive HAP emissions are always included in the source-wide emissions

**Appendix A: Emission Calculations
Particulate Sources of Emissions**

Company Name: Naturally Recycled Proteins of Indiana, LLC
Source Address: 4 McGeath Blvd, Montpelier, IN 47359
Permit Number: 009-42446-00025
Reviewer: Tessa Dedek

Emission Unit	Maximum Capacity ¹ (ton/hr)	Emission Factors ² (lb/ton)			Uncontrolled PTE (lb/hr)			Uncontrolled PTE (ton/yr)		
		PM	PM ₁₀	PM _{2.5}	PM	PM ₁₀	PM _{2.5}	PM	PM ₁₀	PM _{2.5}
Solid Raw Material Hammermill EP3-1	6	1.20	0.60	0.60	7.20	3.60	3.60	31.54	15.77	15.77
Solid Raw Material Hammermill EP3-2	6	1.20	0.60	0.60	7.20	3.60	3.60	31.54	15.77	15.77
Dried Product Hammermill EP3-3	18	1.20	0.60	0.60	21.60	10.80	10.80	94.61	47.30	47.30
Total:								157.68	78.84	78.84

Emission Unit	Control Efficiency (%)	Controlled PTE (ton/yr)		
		PM	PM ₁₀	PM _{2.5}
Solid Raw Material Hammermill EP3-1	99%	0.32	0.32	0.32
Solid Raw Material Hammermill EP3-2	99%	0.32	0.32	0.32
Dried Product Hammermill EP3-3	99%	0.95	0.95	0.95
Total:		1.58	1.58	1.58

Emission Unit	PSD Minor Limits ³ (lb/hr)		Limited PTE (tpy)	
	PM	PM ₁₀	PM	PM ₁₀
Solid Raw Material Hammermill EP3-1	4.45	3.17	19.49	13.88
Solid Raw Material Hammermill EP3-2	4.45	3.17	19.49	13.88
Dried Product Hammermill EP3-3	13.30	9.51	58.25	41.65
Total:			97.24	69.42

Notes:

¹The maximum capacity of dried product hammermill EP3-3 is based on the combined maximum capacity of product dryers EP1, EP2, & EP4.

²Emission factors were taken from AP-42, Table 9.9.1-2 for Animal Feed Mills. The Uncontrolled PM Emission Factor was estimated assuming a 99% baghouse control
 Uncontrolled EF = Controlled EF / (1 - 0.99). Per footnote (y) of Table 9.9.1-2, controlled PM¹⁰ emissions are estimated by taking 100 % of the filterable PM emission factor.
 Per the Emission Factor Documentation for AP-42 Section 9.9.1 Grain Elevators and Grain Processing Plants Final Report, uncontrolled PM-10 emission factors are estimated by taking 50% of the filterable PM emission factor. PM_{2.5} emissions are estimated by taking 100 % of the PM₁₀ emission factors.

³In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, emissions from solid raw material hammermills EP3-1 and EP3-2 shall not exceed 4.45 lb/hr for PM and 3.17 lb/hr for PM₁₀. Additionally, emissions from dried product hammermill EP3-3 shall not exceed 13.30 lb/hr for PM and 9.51 lb/hr for PM₁₀.

Methodology

Uncontrolled PTE (lb/hr) = Maximum Capacity (ton/hr) * Uncontrolled Emission Factor (lb/ton)

Uncontrolled PTE (tpy) = Uncontrolled PTE (lb/hr) * 8,760 (hr/yr) / 2,000 (lb/ton)

Controlled PTE (tpy) = Uncontrolled PTE (tpy) x [1 - Control Efficiency (%)]

Unlimited PTE (tpy) = PSD Minor Limit (lb/hr) * 8,760 (hr/yr) / 2,000 (lb/ton)

**Appendix A: Emission Calculations
Product Dryers (Process Emissions)**

Company Name: Naturally Recycled Proteins of Indiana, LLC
Source Address: 4 McGeath Blvd, Montpelier, IN 47359
Permit Number: 009-42446-00025
Reviewer: Tessa Dedek

Emission Unit	Maximum Output Capacity ¹ (ton/hr)	Emission Factors (lb/ton)				Uncontrolled PTE (lb/hr)				Uncontrolled PTE (ton/yr)			
		PM ¹	PM ₁₀ ¹	PM _{2.5} ¹	VOC ²	PM	PM ₁₀	PM _{2.5}	VOC	PM	PM ₁₀	PM _{2.5}	VOC
Product Dryer EP1	6	1.710	2.170	2.040	0.803	10.26	13.02	12.24	4.82	44.94	57.03	53.61	21.10
Product Dryer EP2	6	1.710	2.170	2.040	0.803	10.26	13.02	12.24	4.82	44.94	57.03	53.61	21.10
Product Dryer EP4	6	1.710	2.170	2.040	0.803	10.26	13.02	12.24	4.82	44.94	57.03	53.61	21.10
Total:										134.82	171.08	160.83	63.31

Notes:

¹The emission factors for PM, PM₁₀, and PM_{2.5} are based on uncontrolled stack test conducted in November 2015, with a 6-fold margin of safety.

²The emission factor for VOC is based on an uncontrolled stack test conducted in Nov 2012, plus a 50% factor.

Methodology:

Uncontrolled PTE (lb/hr) = Maximum Output Capacity (ton/hr) * Emission Factor (lb/ton)

Uncontrolled PTE (tpy) = Uncontrolled PTE (lb/hr) * 8,760 (hr/yr) / 2,000 (lb/ton)

**Appendix A: Emission Calculations
Product Dryers (NG Combustion)
Natural Gas Combustion Only, MMBtu/hr < 100**

Company Name: Naturally Recycled Proteins of Indiana, LLC
Source Address: 4 McGeath Blvd, Montpelier, IN 47359
Permit Number: 009-42446-00025
Reviewer: Tessa Dedek

Emission Unit	Heat Input Capacity (MMBtu/hr)	HHV (MMBtu/MMscf)	Potential Throughput (MMCF/yr)
Product Dryer EP1	15.00	1020	128.82
Product Dryer EP2	15.00		128.82
Product Dryer EP4	15.00		128.82
Total:	45.00	-	386.47

Emission Factor ² (lb/MMCF):	Criteria Pollutants Uncontrolled PTE (tpy)						
	PM ¹	PM ₁₀ ¹	PM _{2.5} ¹	SO ₂	NO _x ²	VOC ¹	CO
Product Dryer EP1	-	-	-	0.04	6.44	-	5.41
Product Dryer EP2	-	-	-	0.04	6.44	-	5.41
Product Dryer EP4	-	-	-	0.04	6.44	-	5.41
Total:	-	-	-	0.12	19.32	-	16.23

Notes:

¹The dryer process emissions include both the process emissions and the combustion emissions for PM, PM₁₀, PM_{2.5}, & VOC.

²Emission factors for NO_x: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology:

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Hazardous Air Pollutants (HAPs)

Emission Factor ³ (lb/MMCF):	HAPs - Organics Uncontrolled PTE (tpy)					
	Benzene	Dichlorobenzen	Formaldehyde	Hexane	Toluene	Total - Organics
Product Dryer EP1	1.35E-04	7.73E-05	4.83E-03	0.12	2.19E-04	1.21E-01
Product Dryer EP2	1.35E-04	7.73E-05	4.83E-03	0.12	2.19E-04	1.21E-01
Product Dryer EP4	1.35E-04	7.73E-05	4.83E-03	0.12	2.19E-04	1.21E-01
Total:	4.06E-04	2.32E-04	0.01	0.35	6.57E-04	3.64E-01

Emission Factor ³ (lb/MMCF):	HAPs - Metals Uncontrolled PTE (tpy)					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Product Dryer EP1	3.22E-05	7.09E-05	9.02E-05	2.45E-05	1.35E-04	3.53E-04
Product Dryer EP2	3.22E-05	7.09E-05	9.02E-05	2.45E-05	1.35E-04	3.53E-04
Product Dryer EP4	3.22E-05	7.09E-05	9.02E-05	2.45E-05	1.35E-04	3.53E-04
Total:	9.66E-05	2.13E-04	2.71E-04	7.34E-05	4.06E-04	1.06E-03

Emission Unit	Highest Single HAP ² (tpy)	Total HAPs (tpy)
Product Dryer EP1	0.12	0.12
Product Dryer EP2	0.12	0.12
Product Dryer EP4	0.12	0.12

Notes:

¹The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

²The highest single HAP is hexane.

Methodology:

Same as above.

**Appendix A: Emission Calculations
Material Handling**

Company Name: Naturally Recycled Proteins of Indiana, LLC
Source Address: 4 McGeath Blvd, Montpelier, IN 47359
Permit Number: 009-42446-00025
Reviewer: Tessa Dedek

Emission Unit	Maximum Capacity ¹ (ton/hr)	Emission Factors (lb/ton)				Uncontrolled PTE (lb/hr)			Uncontrolled PTE (ton/yr)		
		PM	PM ₁₀	PM _{2.5}	EF Ref ²	PM	PM ₁₀	PM _{2.5}	PM	PM ₁₀	PM _{2.5}
Truck Receiving of Solid Raw Material	12	0.017	0.0025	0.0025	[a]	0.20	0.03	0.03	0.89	0.13	0.13
Solid Raw Material Storage Bins (12)	12	0.025	0.0063	0.0011	[b]	0.30	0.08	0.01	1.31	0.33	0.06
Conveyance of Solid Material	12	0.061	0.034	0.0058	[b]	0.73	0.41	0.07	3.21	1.79	0.30
Enclosed Solid Material Mixer	12	0.061	0.034	0.0058	[b]	0.73	0.41	0.07	3.21	1.79	0.30
Mixed Material Blenders (3)	24.3	0.061	0.034	0.0058	[b]	1.48	0.83	0.14	6.49	3.62	0.62
Finished Dried Product Bins (108)	18	0.025	0.0063	0.0011	[b]	0.45	0.11	0.02	1.97	0.50	0.09
Finished Product Load-Out	18	0.0033	0.0008	0.0008	[a]	0.06	0.01	0.01	0.26	0.06	0.06
Total:									17.34	8.22	1.57

Notes:

¹Maximum Capacity Derivation:

The maximum capacity of the truck receiving of solid raw materials, solid raw material storage bins (12), conveyance of solid material, & enclosed solid material mixer is based on the combined maximum capacity of solid raw material hammermills EP3-1 & EP3-2.

The maximum capacity of the mixed material blenders (3) is based on the combined maximum input capacity of product dryers EP1, EP2, & EP3.

The maximum capacity of the finished dried product bins (108) & finished product load-out is based on the combined maximum output capacity of product dryers EP1, EP2, & EP3.

²Emission Factor References:

[a] Emission Factors from AP-42, Table 9.9.1-2 for Animal Feed Mills.

[b] Emission Factors from AP-42, Table 9.9.1-1 for Grain Elevators.

Methodology:

Uncontrolled PTE (lb/hr) = Maximum Capacity (ton/hr) * Emission Factor (lb/ton)

Uncontrolled PTE (tpy) = Uncontrolled PTE (lb/hr) * 8,760 (hr/yr) / 2,000 (lb/ton)

Appendix A: Emission Calculations
Miscellaneous Natural Gas Combustion
Natural Gas Combustion Only, MMBtu/hr < 100

Company Name: Naturally Recycled Proteins of Indiana, LLC
Source Address: 4 McGeath Blvd, Montpelier, IN 47359
Permit Number: 009-42446-00025
Reviewer: Tessa Dedek

Emission Unit	Heat Input Capacity (MMBtu/hr)	HHV (MMBtu/MMscf)	Potential Throughput (MMCF/yr)
Dryer Room Make-Up Air Unit	10.500	1,020	90.18
Absolute Air Direct Gas-Fired Centrifugal SWSI Make-Up Air Units (2)	21.000		180.35
Hi-Efficiency Furnace (Office)	0.135		1.16
Water Heater (Office)	0.050		0.43
Tanker Bay Radiant Heaters (4)	0.400		3.44
Tank Area Radiant Heaters (4)	0.600		5.15
Hotsy Model 1835 (Plant)	0.558		4.79
Hi-Efficiency Furnace (Truck Bldg Office)	0.135		1.16
Water Heater (Truck Bldg Office)	0.050		0.43
Shop Radiant Heaters (2)	0.500		4.29
Hotsy Model 1835 (Shop)	0.558		4.79
Total:	34.486		-

	Criteria Pollutants Uncontrolled PTE (tpy)						
	PM ¹	PM ₁₀ ¹	PM _{2.5} ¹	SO ₂	NO _x ²	VOC	CO
Emission Factor² (lb/MMCF):	1.9	7.6	7.6	0.6	100	5.5	84
Total:	0.28	1.13	1.13	0.09	14.81	0.81	12.44

Notes:

¹PM emission factor is filterable PM only. PM₁₀ emission factor includes both filterable and condensable PM₁₀ combined.

PM_{2.5} emission factor is filterable and condensable PM_{2.5} combined.

²Emission factors for NO_x: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology:

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics Uncontrolled PTE (tpy)					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
Emission Factor³ (lb/MMCF):	2.1E-03	1.2E-03	0.08	1.8	3.4E-03	
Total:	3.11E-04	1.78E-04	0.01	0.27	5.03E-04	0.28

	HAPs - Metals Uncontrolled PTE (tpy)					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor³ (lb/MMCF):	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Total:	7.40E-05	1.63E-04	2.07E-04	5.63E-05	3.11E-04	8.12E-04

Highest Single HAP² (tpy):	0.27
Total HAPs (tpy):	0.28

Notes:

¹The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

²The highest single HAP is hexane.

Methodology:

Same as above.

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: Naturally Recycled Proteins of Indiana, LLC
Source Address: 4 McGeath Blvd, Montpelier, IN 47359
Permit Number: 009-42446-00025
Reviewer: Tessa Dedek

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum Number of Vehicles per Day	Number of One Way Trips per Day per Vehicle	Maximum Trips per Day (trip/day)	Maximum Weight of Loaded Vehicle (ton/trip)	Total Weight Driven per Day (ton/day)	Maximum One-Way Distance			
						(ft/trip)	(miles/trip)	(miles/day)	(miles/yr)
Inbound Product - Full	1.0	23.3	23.3	40.0	933.1	1,082.4	0.205	4.8	1,745.5
Inbound Product - Empty	1.0	23.3	23.3	15.0	349.9	1,082.4	0.205	4.8	1,745.5
Outbound Product - Full	1.0	17.3	17.3	40.0	691.2	1,082.4	0.205	3.5	1,293.0
Outbound Product - Empty	1.0	17.3	17.3	15.0	259.2	1,082.4	0.205	3.5	1,293.0
Total:			81.2		2,233.4			16.6	6,077.0

Average Vehicle Weight Per Trip = tons/trip
Average Miles Per Trip = miles/trip

Unmitigated Emission Factor, Ef = $k \cdot [(s/12)^a] \cdot [(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

	PM	PM ₁₀	PM _{2.5}
where k =	4.9	1.5	0.15
s =	6.0	6.0	6.0
a =	0.7	0.9	0.9
W =	27.5	27.5	27.5
b =	0.45	0.45	0.45

lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron & Steel Production)
= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
tons = average vehicle weight
= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E \cdot [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, Eext = $E \cdot [(365 - P)/365]$

where P = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM ₁₀	PM _{2.5}
Unmitigated Emission Factor, Ef =	8.17	2.18	0.22
Mitigated Emission Factor, Eext =	5.38	1.43	0.14

lb/mile
lb/mile

Type	Mitigated, Uncontrolled PTE (tpy)		
	PM	PM ₁₀	PM _{2.5}
Inbound Product - Full	4.69	1.25	0.13
Inbound Product - Empty	4.69	1.25	0.13
Outbound Product - Full	3.47	0.93	0.09
Outbound Product - Empty	3.47	0.93	0.09
Total:	16.33	4.35	0.44

Notes:

All raw materials delivered and all finished product shipped will be transported by semi-tank wagon or semi-trailer.

Each of the 2 dryers can handle 8.1 tons/hr of wet material input, so assume that the incoming weight is based on this:

$$\text{Inbound Materials (tpy)} = [8.1 \text{ (ton/hr/dryer)}] \cdot [3 \text{ (dryers)}] \cdot [8,760 \text{ (hr/yr)}] = 212,868$$

Each of the 2 dryers can output 6.0 tons/hr of dry material, so assume that the outgoing weight is based on this:

$$\text{Outbound Materials (tpy)} = [6.0 \text{ (ton/hr/dryer)}] \cdot [3 \text{ (dryers)}] \cdot [8,760 \text{ (hr/yr)}] = 157,680$$

Methodology:

Number of One-Way Trips per Day per Vehicle = Maximum Weight of Inbound/Outbound Materials (tpy) / Maximum Weight of Loaded Vehicle Difference (ton/trip) / 365 (day/yr)

Maximum Weight of Inbound Materials (tpy) = Dryer Material Input (ton/hr/dryer) * 3 (dryers) * 8,760 (hr/yr)

Maximum Weight of Outbound Materials (tpy) = Dryer Material Output (ton/hr/dryer) * 3 (dryers) * 8,760 (hr/yr)

Maximum Weight of Loaded Vehicle Difference (ton/trip) = Maximum Weight of Loaded Vehicle, Full (ton/trip) - Maximum Weight of Loaded Vehicle, Empty (ton/trip)

Total Weight Driven per Day (ton/day) = Maximum Weight of Loaded Vehicle (ton/trip) * Maximum Trips per Day (trip/day)

Maximum One-Way Distance (mile/trip) = Maximum One-Way Distance (feet/trip) / 5,280 ft/mile

Maximum One-Way Miles (mile/day) = Maximum Trips per Year (trip/day) * Maximum One-Way Distance (mile/trip)

Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight Driven per Day (ton/day)] / SUM[Maximum Trips per Day (trip/day)]

Average Miles Per Trip (mile/trip) = SUM[Maximum One-Way Miles (mile/day)] / SUM[Maximum Trips per Year (trip/day)]

Mitigated, Uncontrolled PTE (tpy) = Maximum One-Way Miles (mile/yr) * Mitigated Emission Factor (lb/mile) / 2,000 (lb/ton)

Appendix A: Emission Calculations
326 IAC 6-2-4 Limits

Company Name: Naturally Recycled Proteins of Indiana, LLC
Source Address: 4 McGeath Blvd, Montpelier, IN 47359
Permit Number: 009-42446-00025
Reviewer: Tessa Dedek

Summary of Indirect Heating Units Which Began Operation After September 21, 1983

Facility	Construction Date	Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)	Particulate Limitation, Pt (lb/MMBtu)	PM PTE based on AP-42 (lb/MMBtu)
Water Heater (Office)	2011	0.050	1.22	1.04	0.60	0.0019
Hotsy Model 1835 (Plant)		0.558		1.04		
Water Heater (Truck Bldg Office)		0.050		1.04		
Hotsy Model 1835 (Shop)		0.558		1.04		

Notes:

Pursuant to 326 IAC 6-2-4, the Allowable Emission Rate, Pt, for each unit was calculated using the following equation: $Pt = 1.09 \div Q^{0.26}$

Pt = pounds of particulate matter emitted per million Btu heat input

Q = total source maximum operating capacity in MMBtu/hr heat input

Methodology:

$Q, 2015 \text{ (MMBtu/hr)} = \text{SUM}[\text{Maximum Capacity (MMBtu/hr) for all units constructed in 2015}]$

$Q, 2016 \text{ (MMBtu/hr)} = Q, 2015 \text{ (MMBtu/hr)} + \text{SUM}[\text{Maximum Capacity (MMBtu/hr) for all units constructed in 2016}]$

$Pt \text{ (lb/MMBtu)} = 1.09 \div Q \text{ (MMBtu/hr)}^{0.26}$

$\text{Uncontrolled PTE of PM (lb/MMBtu)} = \text{Uncontrolled PTE of PM (lb/MMCF)} \div 1,020 \text{ (MMBtu/mm scf)}$

Appendix A: Emission Calculations
326 IAC 6-3-2 Limits

Company Name: Naturally Recycled Proteins of Indiana, LLC
Source Address: 4 McGeath Blvd, Montpelier, IN 47359
Permit Number: 009-42446-00025
Reviewer: Tessa Dedek

Summary of Process Weight Rate Limits^{1,2}

Emission Unit	Process Weight Rate, P (ton/hr)	Allowable PM Emission Rate, E (lb/hr)	Uncontrolled PTE of PM (lb/hr)
Solid Raw Material Hammermill EP3-1	6	13.62	7.20
Solid Raw Material Hammermill EP3-2	6	13.62	7.20
Dried Product Hammermill EP3-3	18	28.43	21.60
Product Dryer EP1	6	13.62	10.26
Product Dryer EP2	6	13.62	10.26
Product Dryer EP4	6	13.62	10.26
Conveyance of Solid Material	12	21.67	0.73
Enclosed Solid Material Mixer	12	21.67	0.73

Notes:

¹Pursuant to 326 IAC 6-3-2, the Allowable Emission Rate, E, for each unit was calculated using the following equation: $E = 4.10 P^{0.67}$

²Based on the Allowable PM Emission Rate and the Uncontrolled PTE of PM for each unit, no control equipment is needed to comply with 326 IAC 6-3-2.

Methodology:

Allowable PM Emission Rate, E (lb/hr) = 4.10 * Process Weight Rate, P (ton/hr) ^ 0.67



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

September 2, 2020

Jimmy Watters
Naturally Recycled Proteins of Indiana, LLC
4 McGeath Blvd
Montpelier, IN 47359

Re: Public Notice
Naturally Recycled Proteins of Indiana, LLC
Permit Level: Title V Renewal
Permit Number: 009-42446-00025

Dear Mr. Watters:

Enclosed is a copy of the preliminary findings for your draft air permit, including the draft permit, Technical Support Document, emission calculations, and the Notice of 30-Day Period for Public Comment.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment (without supporting documents) has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: <https://www.in.gov/ide/5474.htm>

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Montpelier-Harrison Township Public Library, 301 South Main Street in Montpelier, IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Tessa Dedek, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5402 or dial (317) 234-5402.

Sincerely,

Theresa Weaver

Theresa Weaver
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 8/10/2020



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Bruno L. Pigott
Commissioner

September 2, 2020

To: Montpelier-Harrison Township Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Naturally Recycled Proteins of Indiana, LLC
Permit Number: 009-42446-00025

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019



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Commissioner

Notice of Public Comment

September 2, 2020
Naturally Recycled Proteins of Indiana, LLC
009-42446-00025

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM's Public Notice website at <https://www.in.gov/idem/5474.htm>.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover Letter 2/28/2020



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Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

September 2, 2020

A 30-day public comment period has been initiated for:

Permit Number: 009-42446-00025
Applicant Name: Naturally Recycled Proteins of Indiana, LLC
Location: Montpelier, Blackford County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

<http://www.in.gov/ai/appfiles/idem-caats/>

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification 1/9/2017

Mail Code 61-53

IDEM Staff	TAWEAVER 9/2/2020		PAGE 1 of 2
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY
			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Jimmy Watters Naturally Recycled Proteins of Indiana LLC 4 McGeath Blvd Montpelier IN 47359 (Source CAATS)										
2		Alan Koch CEO Naturally Recycled Proteins of Indiana LLC PO Box 394 Johnston IA 501310394 (RO CAATS)										
3		Blackford County Commissioners 110 West Washington Street Hartford City IN 47348 (Local Official)										
4		Blackford County Health Department 506 E. Van Cleve Street Hartford City IN 47348-1846 (Health Department)										
5		Ms. Mary Shipley 10968 E 100 S Marion IN 46953 (Affected Party)										
6		Glen & Judith Van Camp 6725 N. Blackford Ave Montpelier IN 47359 (Affected Party)										
7		Montpelier-Harrison Township Public Library 301 S Main St Montpelier IN 47359-1428 (Library)										
8		Daryl & Lois Hoffman 7750 N. CR 75 E Lizton IN 46149 (Affected Party)										
9		James Rickun James S. Rickun Environmental Consulting 4933 Black Oak Drive Madison WI 53711-4373 (Consultant)										
10		Mr. Dan Baughey 103 Lakeview Drive Hartford City IN 47348 (Affected Party)										
11		Montpelier City Council and Mayors Office 300 W. Huntington St. Montpelier IN 47359 (Local Official)										
12		Cathie McCammon 3779 East State Rd 18 Montpelier IN 47359 (Affected Party)										
13		Shirley Glessner 6827 N. Blackford Ave Montpelier IN 47359 (Affected Party)										
14		Wendell & Brenda Bonewit 6891 N 400 E Montpellier IN 47359 (Affected Party)										
15		Kathy Casterline 630 S Main Street Montpelier IN 47359 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Mail Code 61-53

IDEM Staff	TAWEAVER 9/2/2020		PAGE 2 of 2	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Brad Neff 109 W Huntington Street Montpelier IN 47359 (Affected Party)										
2		Jerry Ickes Ickes RV Supplies 701 West Huntington Street Montpelier IN 47359 (Affected Party)										
3		Rita Wagner 268 W High Street Montpelier IN 47359 (Affected Party)										
4		Terry Herring 719 South Main Street Montpelier IN 47359 (Affected Party)										
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8												
9												
10												
11												
12												
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14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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