NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and
Minor Source Operating Permit (MSOP)

for Kent Nutrition Group in Cass County

MSOP No.: M017-43150-00024

The Indiana Department of Environmental Management (IDEM) has received an application from Kent Nutrition Group, located at 2407 S CR 400 E, Logansport, Indiana 46947, for a new source construction and MSOP. If approved by IDEM’s Office of Air Quality (OAQ), this proposed permit would allow Kent Nutrition Group to construct and operate a new stationary prepared feeds manufacturing facility.

The applicant intends to construct and operate new equipment that will emit air pollutants. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

IDEM is aware that the stationary prepared feeds manufacturing facility has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft permit contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

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

Logansport-Cass County Public Library
616 E Broadway
Logansport, IN 46947

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

A copy of the application and preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC). To access 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 M017-43150-00024 in all correspondence.

Comments should be sent to:

Brian Wright  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Brian Wright or (317) 234-6544  
Or dial directly: (317) 234-6544  
Fax: (317) 232-6749 attn: Brian Wright  
E-mail: Bwright1@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 Brian Wright of my staff at the above address.

Madhurima D. Moulik, Ph.D., Section Chief  
Permits Branch  
Office of Air Quality
New Source Construction and Minor Source Operating Permit
OFFICE OF AIR QUALITY

Kent Nutrition Group
2407 S CR 400 E
Logansport, Indiana 46947

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 MSOP under 326 IAC 2-6.1.

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<td>Master Agency Interest ID: 455</td>
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<td>Madhurima D. Moulik, Ph. D., Section Chief</td>
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<td>Permits Branch</td>
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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 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary prepared feeds manufacturing facility.

| Source Address: 2407 S CR 400 E, Logansport, Indiana 46947 |
| General Source Phone Number: 563-264-4403 |
| SIC Code: 2048 (Prepared Feeds) |
| County Location: Cass |
| Source Location Status: Attainment for all criteria pollutants |
| Source Status: Minor Source Operating Permit Program |

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) grain receiving area, identified as EU-2, constructed in 1977, with a maximum capacity of 50 tons per hour, uncontrolled, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(b) Ingredient bins, identified as EU-1, constructed in 1977, receiving loadout from the receiving area, with a total maximum throughput of 10 tons per hour, uncontrolled, and exhausting to the atmosphere.

(c) One (1) hammermill, identified as EU-6, constructed in 1977, with a maximum throughput of 10 tons per hour, using a dust collector as particulate control, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(d) Storage bins, identified as EU-9, constructed in 1977, receiving grain from the hammermill, with a maximum throughput of 20 tons per hour, uncontrolled, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(e) One (1) mixer, identified as EU-10, constructed in 1977, with a maximum throughput of 10 tons per hour, uncontrolled, exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(f) One (1) pellet mill, identified as EU-3A, approved in 2020 for construction, with a maximum throughput of 12 tons per hour, equipped with a pellet cooler, using cyclone EP1 as particulate control, and exhausting to stack EP-1. [40 CFR 63, Subpart DDDDDDD]

(g) One (1) pellet mill, identified as EU-4A, constructed in 1977, with a maximum throughput of 12 tons per hour, equipped with a pellet cooler, using cyclone EP2 as particulate control, and exhausting to stack EP-2. [40 CFR 63, Subpart DDDDDDD]
(h) Bulk bins, identified as EU-7, constructed in 1977, receiving finished pellets from the pellet mills, with a maximum throughput of 10 tons per hour, using a dust collector as particulate control, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(i) Bulk Loadout, identified as EU-8, constructed in 1977, with a maximum throughput of 20 tons per hour, uncontrolled, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(j) One (1) bagger for bagging pellets, identified as EU-5, constructed in 1977, with a maximum throughput of 20 tons per hour, using a dust collector as particulate control, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(k) One (1) natural gas-fired boiler, identified as Boiler 1, constructed in 1977, with a maximum heat input rate of 4.1 MMBtu/hr.
SECTION B  GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]
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 2-1.1-1) shall prevail.

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]
Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]
This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
(a) This permit, M017-43150-00024, 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, until the renewal permit has been issued or denied.

B.5 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.6 Enforceability
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.7 Severability

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.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

(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.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 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

(c) The notification 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.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, 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 Permittee shall implement the PMPs.

(b) 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.

(c) 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.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M017-43150-00024 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,
(2) revised, or
(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.13 Termination of Right to Operate [326 IAC 2-6.1-7(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 one hundred twenty (120) days prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-6.1-7.

B.14 Permit Renewal [326 IAC 2-6.1-7]

(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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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 one hundred twenty (120) days 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 2-6.1 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.16 Source Modification Requirement

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

B.17 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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 permitted 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, at reasonable times, 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, at reasonable times, 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, at reasonable times, 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.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.19 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.

(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.20 Credible Evidence [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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

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

C.3 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.4 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.5 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.
C.6 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).

C.7 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.

(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 2-6.1-5(a)(2)]

C.8 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.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days
prior to the actual test date.

(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.9 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 2-6.1-5(a)(2)]

C.10 Compliance Monitoring [326 IAC 2-1.1-11]
Compliance with applicable requirements shall be documented as required by this permit. The
Permittee shall be responsible for installing any necessary equipment and initiating any required
monitoring related to that equipment. All monitoring and record keeping requirements not already
legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

(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

C.12 Response to Excursions or Exceedances

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.13 Actions Related to Noncompliance Demonstrated by a Stack Test

(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.
Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

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

(a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.

(c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

(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. 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.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of 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

(b) 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.

(c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. 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.
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) grain receiving area, identified as EU-2, constructed in 1977, with a maximum capacity of 50 tons per hour, uncontrolled, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(c) One (1) hammermill, identified as EU-6, constructed in 1977, with a maximum throughput of 10 tons per hour, using a dust collector as particulate control, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(e) One (1) mixer, identified as EU-10, constructed in 1977, with a maximum throughput of 10 tons per hour, uncontrolled, exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(f) One (1) pellet mill, identified as EU-3A, approved in 2020 for construction, with a maximum throughput of 12 tons per hour, equipped with a pellet cooler, using cyclone EP1 as particulate control, and exhausting to stack EP-1. [40 CFR 63, Subpart DDDDDDD]

(g) One (1) pellet mill, identified as EU-4A, constructed in 1977, with a maximum throughput of 12 tons per hour, equipped with a pellet cooler, using cyclone EP2 as particulate control, and exhausting to stack EP-2. [40 CFR 63, Subpart DDDDDDD]

(i) Bulk Loadout, identified as EU-8, constructed in 1977, with a maximum throughput of 20 tons per hour, uncontrolled, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(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 2-6.1-5(a)(1)]

D.1.1 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from each of the facilities listed in the following table shall not exceed the pound per hour value when operating at the specified process weight rate:

<table>
<thead>
<tr>
<th>Process</th>
<th>Process Weight Rate, tons/hr</th>
<th>326 IAC 6-3-2 Allowable PM Emission Rate, lb/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grain receiving</td>
<td>50</td>
<td>44.58</td>
</tr>
<tr>
<td>Mixer</td>
<td>10.0</td>
<td>19.18</td>
</tr>
<tr>
<td>Hammermill</td>
<td>10.0</td>
<td>19.18</td>
</tr>
<tr>
<td>Bulk Loadout</td>
<td>20.0</td>
<td>30.51</td>
</tr>
<tr>
<td>Pelletizing (EU-3A)</td>
<td>12.0</td>
<td>21.67</td>
</tr>
<tr>
<td>Pelletizing (EU-4A)</td>
<td>12.0</td>
<td>21.67</td>
</tr>
<tr>
<td>Pellet Cooler (EU-3A)</td>
<td>12.0</td>
<td>21.67</td>
</tr>
<tr>
<td>Pellet Cooler (EU-4A)</td>
<td>12.0</td>
<td>21.67</td>
</tr>
</tbody>
</table>

These limitations are based on the following equations:

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:

\[ E = 4.10 P^{0.67} \]

where \( E \) = rate of emission in pounds per hour and \( P \) = process weight rate in tons per hour
Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

\[ E = 55.0^{P^{0.11}} - 40 \]

where \( E \) = rate of emission in pounds per hour; and
\( P \) = process weight rate in tons per hour

D.1.2 Preventive Maintenance Plan  [326 IAC 1-6-3]

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 plan required by this condition.
### EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

| (k) One (1) natural gas-fired boiler, identified as Boiler 1, constructed in 1977, with a maximum heat input rate of 4.1 MMBtu/hr. |

(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 2-6.1-5(a)(1)]**

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

Pursuant to 326 IAC 6-2(d), particulate matter emissions from the boiler shall not exceed 0.6 lb/MMBtu heat input when operating at a total maximum heat input rate of less than 10 MMBtu/hr.

**D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]**

A Preventive Maintenance Plan is required for this facility and its control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
SECTION E.1

Emissions Unit Description:

(a) One (1) grain receiving area, identified as EU-2, constructed in 1977, with a maximum capacity of 50 tons per hour, uncontrolled, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(c) One (1) hammermill, identified as EU-6, constructed in 1977, with a maximum throughput of 10 tons per hour, using a dust collector as particulate control, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(d) Storage bins, identified as EU-9, constructed in 1977, receiving grain from the hammermill, with a maximum throughput of 20 tons per hour, uncontrolled, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(e) One (1) mixer, identified as EU-10, constructed in 1977, with a maximum throughput of 10 tons per hour, uncontrolled, exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(f) One (1) pellet mill, identified as EU-3A, approved in 2020 for construction, with a maximum throughput of 12 tons per hour, equipped with a pellet cooler, using cyclone EP1 as particulate control, and exhausting to stack EP-1. [40 CFR 63, Subpart DDDDDDD]

(g) One (1) pellet mill, identified as EU-4A, constructed in 1977, with a maximum throughput of 12 tons per hour, equipped with a pellet cooler, using cyclone EP2 as particulate control, and exhausting to stack EP-2. [40 CFR 63, Subpart DDDDDDD]

(h) Bulk bins, identified as EU-7, constructed in 1977, receiving finished pellets from the pellet mills, with a maximum throughput of 10 tons per hour, using a dust collector as particulate control, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(i) Bulk Loadout, identified as EU-8, constructed in 1977, with a maximum throughput of 20 tons per hour, uncontrolled, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(j) One (1) bagger for bagging pellets, identified as EU-5, constructed in 1977, with a maximum throughput of 20 tons per hour, using a dust collector as particulate control, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(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 2-6.1-5(a)(1)]

E.3.1 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the facilities listed in this section. Section B – Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-6.1-5(a)(1)]


(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, except as otherwise specified in 40 CFR Part 63, Subpart DDDDDDD.
(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.3.3 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Prepared Feeds Manufacturing [40 CFR Part 63, Subpart DDDDDDD]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart DDDDDDD (included as Attachment A to the operating permit):

(1) 40 CFR 63.11619(a), (b)(1), (c), and (e)
(2) 40 CFR 63.11620(a)
(3) 40 CFR 63.11621(a) through (d)
(4) 40 CFR 63.11622(a) and (b)
(5) 40 CFR 63.11624
(6) 40 CFR 63.11625
(7) 40 CFR 63.11626
(8) 40 CFR 63.11627
(9) 40 CFR 63.11628
## MINOR SOURCE OPERATING PERMIT
### ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<table>
<thead>
<tr>
<th><strong>Company Name:</strong></th>
<th>Kent Nutrition Group</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Source Address:</strong></td>
<td>2407 S CR 400 E</td>
</tr>
<tr>
<td><strong>City:</strong></td>
<td>Logansport, Indiana 46947</td>
</tr>
<tr>
<td><strong>Phone #:</strong></td>
<td>563-264-4403</td>
</tr>
<tr>
<td><strong>MSOP #:</strong></td>
<td>M017-43150-00024</td>
</tr>
</tbody>
</table>

I hereby certify that Kent Nutrition Group is:  □ still in operation.  □ no longer in operation.

I hereby certify that Kent Nutrition Group is:  □ in compliance with the requirements of MSOP M017-43150-00024.  □ not in compliance with the requirements of MSOP M017-43150-00024.

| **Authorized Individual (typed):** | |
| **Title:** | |
| **Signature:** | |
| **Date:** | |

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<table>
<thead>
<tr>
<th><strong>Noncompliance:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<tr>
<td></td>
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<td></td>
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</tbody>
</table>


MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

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


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

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

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

COMPANY:_________________________________________________________PHONE NO. (      )___________________
LOCATION: (CITY AND COUNTY)_________________________________________________________________________
PERMIT NO. ________________ AFS PLANT ID: ________________ AFS POINT ID: ________________ INSP:__________
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:________________________________________
_____________________________________________________________________________________________________
DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____    _________________________________________ AM / PM
ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _______________________________________

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE______/______/ 20____   _______________ AM/PM

TYPE OF POLLUTANTS EMITTED:   TSP,  PM-10,  SO2,  VOC,  OTHER:________________________________________
ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _______________________________________
MEASURES TAKEN TO MINIMIZE EMISSIONS:______________________________________________________________
___________________________________________________________________________________________________
REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:
CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____________________________________
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____________________________________
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:__________________________
INTERIM CONTROL MEASURES: (IF APPLICABLE)____________________________________________________________
_____________________________________________________________________________________________________
_____________________________________________________________________________________________________
MALFUNCTION REPORTED BY:______________________________TITLE:___________________________
(SIGNATURE IF FAXED)
MALFUNCTION RECORDED BY:_______________________DATE:__________________TIME:__________________

*SEE PAGE 2
Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1  Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39  "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

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

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

________________________________________________________________________
________________________________________________________________________
Affidavit of Construction

I, ____________________________________________________________, being duly sworn upon my oath, depose and say:

(Name of the Authorized Representative)

1. I live in _____________________________ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of ______________________________ for ______________________________________.

   (Title)           (Company Name)

3. By virtue of my position with ___________________________________________________, I have personal (Company Name)
   knowledge of the representations contained in this affidavit and am authorized to make these representations
   on behalf of ________________________________________________________________.

   (Company Name)

4. I hereby certify that Kent Nutrition Group, 2407 S CR 400 E, Logansport, Indiana 46947, completed
   construction of the prepared feeds manufacturing facility on _______________________ in conformity with the
   requirements and intent of the construction permit application received by the Office of Air Quality on August 12,
   2020 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No.
   M017-43150-00024, Plant ID No. 017-00024 issued on ________________________

5. Permittee, please cross out the following statement if it does not apply: Additional (operations/facilities)
   were constructed/substituted as described in the attachment to this document and were not made in
   accordance with the construction permit.

   Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information
and belief.

Signature________________________________________

Date________________________________________

STATE OF INDIANA)

)SS

COUNTY OF _____________________)

Subscribed and sworn to me, a notary public in and for __________________________ County and State of Indiana
on this ___________ day of ____________ , 20____. My Commission expires: ________________________

Signature________________________________________

Name________________________________________ (typed or printed)
Attachment A

Minor Source Operating Permit (MSOP) No: M017-43150-00024

[Downloaded from the eCFR on January 29, 2019]

Electronic Code of Federal Regulations

Title 40: Protection of Environment

PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES

Subpart DDDDDDD—National Emission Standards for Hazardous Air Pollutants for Area Sources: Prepared Feeds Manufacturing

SOURCE: 75 FR 546, Jan. 5, 2010, unless otherwise noted.

APPLICABILITY AND COMPLIANCE DATES

§63.11619 Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate a prepared feeds manufacturing facility that uses a material containing chromium or a material containing manganese and is an area source of emissions of hazardous air pollutants (HAP).

(b) The provisions of this subpart apply to each new and existing prepared feeds manufacturing affected source. A prepared feeds manufacturing affected source is the collection of all equipment and activities necessary to produce animal feed from the point in the process where a material containing chromium or a material containing manganese is added, to the point where the finished animal feed product leaves the facility. This includes, but is not limited to, areas where materials containing chromium and manganese are stored, areas where materials containing chromium and manganese are temporarily stored prior to addition to the feed at the mixer, mixing and grinding processes, pelleting and pellet cooling processes, packing and bagging processes, crumblers and screens, bulk loading operations, and all conveyors and other equipment that transfer the feed materials throughout the manufacturing facility.

(1) A prepared feeds manufacturing affected source is existing if you commenced construction or reconstruction of the facility on or before July 27, 2009.

(2) A prepared feeds manufacturing affected source is new if you commenced construction or reconstruction of the facility after July 27, 2009.

(3) A collection of equipment and activities necessary to produce animal feed at a prepared feeds manufacturing facility becomes an affected source when you commence using a material containing chromium or a material containing manganese.

(c) An affected source is no longer subject to this subpart if the facility stops using materials containing chromium or manganese.

(d) This subpart does not apply to the facilities identified in paragraphs (d)(1) and (2) of this section.

(1) Prepared feeds manufacturing facilities that do not add any materials containing chromium or manganese to any product manufactured at the facility.

(2) Research or laboratory facilities as defined in section 112(c)(7) of the Clean Air Act (CAA).
(e) You are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided you are not otherwise required by law to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart.

§63.11620 What are my compliance dates?

(a) If you own or operate an existing affected source, you must achieve compliance with the applicable provisions of this subpart by no later than January 5, 2012.

(b) If you own or operate a new affected source, you must achieve compliance with the applicable provisions of this subpart by January 5, 2010, or upon startup of your affected source, whichever is later.

(c) If you own or operate a facility that becomes an affected source in accordance with §63.11619 after the applicable compliance date in paragraphs (a) or (b) of this section, you must achieve compliance with the applicable provisions of this subpart by the date that you commence using a material containing manganese or a material containing chromium.

(d) If the average daily feed production level exceeds 50 tons per day for a calendar year for a facility not complying with the requirement in §63.11621(e) to install and operate a cyclone to control emissions from pelleting operations, you must comply with §63.11621(e) and all associated requirements by July 1 of the year following the one-year period.

STANDARDS, MONITORING, AND COMPLIANCE REQUIREMENTS

§63.11621 What are the standards for new and existing prepared feeds manufacturing facilities?

You must comply with the management practices and standards in paragraphs (a) through (d) of this section at all times. For pelleting operations at prepared feeds manufacturing facilities with an average daily feed production level exceeding 50 tons per day, you must also comply with the requirements in paragraph (e) of this section at all times if you are a new source, and if you are an existing source, you must also comply with the requirements in paragraph (f) of this section at all times.

(a) In all areas of the affected source where materials containing chromium or manganese are stored, used, or handled, you must comply with the management practices in paragraphs (a)(1) and (2) of this section.

(1) You must perform housekeeping measures to minimize excess dust. These measures must include, but not be limited to, the practices specified in paragraphs (a)(1)(i) through (iii) of this section.

(i) You must use either an industrial vacuum system or manual sweeping to reduce the amount of dust;

(ii) At least once per month, you must remove dust from walls, ledges, and equipment using low pressure air or by other means, and then sweep or vacuum the area;

(iii) You must keep exterior doors in the immediate affected areas shut except during normal ingress and egress, as practicable. This paragraph (a)(1)(iii) does not apply to areas where finished product is stored in closed containers, and no other materials containing chromium or manganese are present.

(2) You must maintain and operate all process equipment in accordance with manufacturer's specifications and in a manner to minimize dust creation.

(b) You must store any raw materials containing chromium or manganese in closed containers.

(c) The mixer where materials containing chromium or manganese are added must be covered at all times when mixing is occurring, except when the materials are being added to the mixer. Materials containing chromium or manganese must be added to the mixer in a manner that minimizes emissions.
(d) For the bulk loading process where materials containing chromium or manganese are loaded into trucks or railcars, you must lessen fugitive emissions by reducing the distance between the loadout spout and the vehicle being loaded by either paragraph (d)(1) or (d)(2) of this section.

(1) Use a device of any kind at the bulk loadout spout that minimizes the distance to the vehicle being loaded.

(2) Use any other means to minimize the distance between the loadout spout and the vehicle being loaded.

(e) For the pelleting operations at new prepared feeds manufacturing facilities with an average daily feed production level exceeding 50 tons per day, you must capture emissions and route them to a cyclone designed to reduce emissions of particulate matter by 95 percent or greater. You must also comply with the provisions in paragraphs (e)(1) through (3) of this section.

(1) You must demonstrate that the cyclone is designed to reduce emissions of particulate matter by 95 percent or greater using one of the methods specified in paragraphs (e)(1)(i) through (iii) of this section.

(i) Manufacturer specifications;

(ii) Certification by a professional engineer or responsible official; or

(iii) A performance test conducted in accordance with §63.11623 of this section.

(2) You must establish an inlet flow rate, inlet velocity, pressure drop, or fan amperage range that represents proper operation of the cyclone in accordance with the applicable requirement in paragraphs (e)(2)(i), (ii), or (iii) of this section.

(i) If you demonstrate the cyclone design efficiency using manufacturer specifications in accordance with paragraph (e)(1)(i) of this section, the inlet flow rate, inlet velocity, pressure drop, or fan amperage range that represents proper operation of the cyclone must be provided by the manufacturer.

(ii) If you demonstrate the cyclone design efficiency using certification by a professional engineer or responsible official in accordance with paragraph (e)(1)(ii) of this section, this certification must include calculations to establish an inlet flow rate, inlet velocity, pressure drop, or fan amperage range that represents proper operation of the cyclone.

(iii) If you demonstrate the cyclone design efficiency using a performance test in accordance with paragraph (e)(1)(iii) of this section, you must monitor the inlet flow rate, inlet velocity, pressure drop, or fan amperage during the test and establish a range that represents proper operation of the cyclone based on the data obtained during the test.

(3) You must maintain and operate the cyclone in accordance with manufacturer’s specifications. If manufacturer’s specifications are not available, you must develop and follow standard maintenance and operating procedures that ensure proper operation of the cyclone.

(f) For the pelleting operations at existing prepared feeds manufacturing facilities with an average daily feed production level exceeding 50 tons per day, you must capture emissions and route them to a cyclone. The cyclone must be maintained in accordance with good air pollution control practices and manufacturer’s specifications and operating instructions, if available. If manufacturer’s specifications and operating instructions are not available, you must develop and follow standard operating procedures that ensure proper operation and maintenance of the cyclone.


§63.11622  What are the monitoring requirements for new and existing sources?

(a) If you own or operate an affected source required by §63.11621(d) to use a device at the loadout end of a bulk loader that reduces fugitive emissions from a bulk loading process, you must perform monthly inspections of each
device to ensure it is in proper working condition. You must record the results of these inspections in accordance with §63.11624(c)(4) of this subpart.

(b) If you own or operate an affected source required by §63.11621(e) or (f) to install and operate a cyclone to control emissions from pelleting operations, you must comply with the inspection and monitoring requirements in paragraphs (b)(1) and either (b)(2) or (b)(3) of this section, as applicable.

(1) You must perform quarterly inspections of the cyclone for corrosion, erosion, or any other damage that could result in air in-leakage, and record the results in accordance with §63.11624(c).

(2) If you own or operate a new source, you must monitor inlet flow rate, inlet velocity, pressure drop, or fan amperage at least once per day when the pelleting process is in operation. You must also record the inlet flow rate, inlet velocity, pressure drop, or fan amperage in accordance with §63.11624(c)(4).

(3) If you own or operate an existing source, you must perform a weekly visual inspection of the operating cyclone to ensure it is operating consistent with good air pollution control practices.


§63.11623 What are the testing requirements?

(a) If you are demonstrating that the cyclone required by §63.11621(e) is designed to reduce emissions of particulate matter by 95 percent or greater by the performance test option in §63.11621(e)(1)(iii), you must conduct a test in accordance with paragraph (b) of this section and calculate the percent reduction in accordance with paragraph (c) of this section.

(b) You must use Method 5 in Appendix A to part 60 to determine the particulate matter mass rate at the inlet and outlet of the cyclone. You must conduct at least three runs at the cyclone inlet and three runs at the cyclone outlet. Each run must have a sampling time of at least 60 minutes and a sample volume of at least 0.85 dscm (30 dscf).

(c) You must calculate the percent particulate matter reduction using Equation 1.

\[
PM\ RED = \left(\frac{M_{\text{INLET}} - M_{\text{OUTLET}}}{M_{\text{INLET}}}\right) \times 100
\]

Equation 1

Where:

PM RED = particulate matter reduction, percent;

\(M_{\text{INLET}}\) = Mass of particulate matter at the inlet of the cyclone, dry basis, corrected to standard conditions, g/min;

\(M_{\text{OUTLET}}\) = Mass of particulate matter at the outlet of the cyclone, dry basis, corrected to standard conditions, g/min;

§63.11624 What are the notification, reporting, and recordkeeping requirements?

(a) Notifications. You must submit the notifications identified in paragraphs (a)(1) and (2) of this section.

(1) Initial Notification. If you are the owner of an affected source you must submit an Initial Notification no later than May 5, 2010, or 120 days after you become subject to this subpart, whichever is later. The Initial Notification must include the information specified in paragraphs (a)(1)(i) through (iv) of this section.

(i) The name, address, phone number and e-mail address of the owner and operator;
(ii) The address (physical location) of the affected source;

(iii) An identification of the relevant standard (i.e., this subpart); and

(iv) A brief description of the operation.

(2) Notification of Compliance Status. If you are the owner of an existing affected source, you must submit a Notification of Compliance Status in accordance with §63.9(h) of the General Provisions on or before May 4, 2012. If you are the owner or operator of a new affected source, you must submit a Notification of Compliance Status within 120 days of initial startup, or by October 18, 2010, whichever is later. If you own or operate an affected source that becomes an affected source in accordance with §63.11619(b)(3) after the applicable compliance date in §63.11620 (a) or (b), you must submit a Notification of Compliance Status within 120 days of the date that you commence using materials containing manganese or chromium. This Notification of Compliance Status must include the information specified in paragraphs (a)(2)(i) through (iv) of this section.

(i) Your company’s name and address;

(ii) A statement by a responsible official with that official’s name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart;

(iii) If you own or operate a new source required by §63.11621(e) to install and operate a cyclone to control emissions from pelleting operations, the inlet flow rate, inlet velocity, pressure drop, or fan amperage range than constitutes proper operation of the cyclone determined in accordance with §63.11621(e)(2).

(iv) If you own or operate an existing source required by §63.11621(f) to install and operate a cyclone to control emissions from pelleting operations, documentation of what constitutes proper operation of the cyclone determined in accordance with §63.11621(f).

(v) If you own or operate an affected source that is not subject to a requirement in §63.11621(e) or (f) to install and operate a cyclone to control emissions from pelleting operations because your initial average daily feed production level was 50 tpd or less, documentation of your initial daily pelleting production level determination.

(b) Annual compliance certification report. You must, by March 1 of each year, prepare an annual compliance certification report for the previous calendar year containing the information specified in paragraphs (b)(1) through (b)(6) of this section. You must submit the report if you had any instance described by paragraph (b)(3) or (b)(4) of this section.

(1) Your company’s name and address.

(2) A statement by a responsible official with that official’s name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart.

(3) If the source is not in compliance, include a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken.

(4) If you own or operate a new source that is subject to §63.11621(e), you must identify all instances when the daily inlet flow rate, inlet velocity, pressure drop, or fan amperage is outside the range that constitutes proper operation of the cyclone submitted as part of your Notification of Compliance Status. In these instances, include the time periods when this occurred and the corrective actions taken.

(5) If you own or operate an existing source that is subject to §63.11621(f), you must identify all instances when the cyclone was not operating properly as determined in accordance with §63.11621(f).
(6) If you own or operate an affected source that is not subject to a requirement in §63.11621(e) or (f) to install and operate a cyclone to control emissions from pelleting operations because your average daily feed production level was 50 tpd or less, notification if your average daily feed production level for the previous year was 50 tpd or less and that you are no longer complying with §63.11621(e) or (f).

(7) If you own or operate an affected source that was subject to a requirement in §63.11621(e) or (f) to install and operate a cyclone to control emissions from pelleting operations, notification if your average daily feed production level for the previous year was 50 tpd or less and that you are no longer complying with §63.11621(e) or (f).

(c) Records. You must maintain the records specified in paragraphs (c)(1) through (6) of this section in accordance with paragraphs (c)(7) through (9) of this section.

(1) As required in §63.10(b)(2)(xiv), you must keep a copy of each notification that you submitted to comply with this subpart in accordance with paragraph (a) of this section, and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.

(2) You must keep a copy of each Annual Compliance Certification prepared in accordance with paragraph (b) of this section.

(3) For each device used to comply with the requirements in §63.11621(d), you must keep the records of all inspections including the information identified in paragraphs (c)(3)(i) through (iii) of this section.

(i) The date, place, and time of each inspection;

(ii) Person performing the inspection;

(iii) Results of the inspection, including the date, time, and duration of the corrective action period from the time the inspection indicated a problem to the time of the indication that the device was replaced or restored to operation.

(4) If you own or operate a new source that is subject to §63.11621(e), you must keep the records in paragraphs (c)(4)(i) through (v) of this section.

(i) If you demonstrate that the cyclone is designed to reduce emission of particulate matter by 95 percent or greater by manufacturer's specifications in accordance with §63.11621(e)(1)(i), you must keep the records specified in paragraphs (c)(4)(i)(A) through (C) of this section.

(A) Information from the manufacturer regarding the design efficiency of the cyclone,

(B) The inlet flow rate, inlet velocity, pressure drop, or fan amperage range that represents proper operation of the cyclone,

(C) The operation and maintenance procedures to ensure proper operation of the cyclone.

(ii) If you demonstrate that the cyclone is designed to reduce emissions of particulate matter by 95 percent or greater by certification by a professional engineer in accordance with paragraph §63.11621(e)(1)(ii), you must keep the records specified in paragraphs (c)(4)(i)(A) through (C) of this section.

(A) Certification regarding the design efficiency of the cyclone, along with supporting information,

(B) The inlet flow rate, inlet velocity, pressure drop, or fan amperage range that represents proper operation of the cyclone,

(C) The standard maintenance and operating procedures that ensure proper operation of the cyclone.

(iii) If you demonstrate that the cyclone is designed to reduce emissions of particulate matter by 95 percent or greater by a performance in accordance with paragraph §63.11621(e)(1)(iii), you must keep the records specified in paragraphs (c)(4)(i)(A) through (C) of this section.
(A) Results of the testing conducted in accordance with §63.11623,

(B) The inlet flow rate, inlet velocity, pressure drop, or fan amperage range that represents proper operation of the cyclone,

(C) The standard maintenance and operating procedures that ensure proper operation of the cyclone.

(iv) Records of all quarterly inspections including the information identified in paragraphs (c)(4)(iv)(A) through (C) of this section.

(A) The date, place, and time of each inspection;

(B) Person performing the inspection;

(C) Results of the inspection, including the date, time, and duration of the corrective action period from the time the inspection indicated a problem to the time of the indication that the cyclone was restored to proper operation.

(v) Records of the daily inlet flow rate, inlet velocity, pressure drop, or fan amperage measurements, along with the date, time, and duration of the correction action period from the time the monitoring indicated a problem to the time of the indication that the cyclone was restored to proper operation.

(5) If you own or operate an existing source that is subject to §63.11621(f), you must keep the records in paragraphs (c)(5)(i) and (ii) of this section.

(i) Records of all quarterly inspections including the information identified in paragraphs (c)(5)(i)(A) through (C) of this section.

(A) The date, place, and time of each inspection;

(B) Person performing the inspection;

(C) Results of the inspection, including the date, time, and duration of the corrective action period from the time the inspection indicated a problem to the time of the indication that the cyclone was restored to proper operation.

(ii) Records of weekly visual inspections of the operating cyclone, including a record of any corrective action taken as a result of the inspection.

(6) If you own or operate an affected source that is not subject to a requirement in §63.11621(e) or (f) to install and operate a cyclone to control emissions from pelleting operations because your average daily feed production level is 50 tpd or less, feed production records to enable the determination of the average daily feed production level.

(7) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1).

(8) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each recorded action.

(9) You must keep each record onsite for at least 2 years after the date of each recorded action according to §63.10(b)(1). You may keep the records offsite for the remaining 3 years.

(d) If you no longer use materials that contain manganese or chromium after January 5, 2010, you must submit a Notification in accordance with §63.11619(c) which includes the information specified in paragraphs (d)(1) and (2) of this section.

(1) Your company's name and address;
(2) A statement by a responsible official indicating that the facility no longer uses materials that contain chromium or manganese. This statement should also include an effective date for the termination of use of materials that contain chromium or manganese, and the responsible official's name, title, phone number, e-mail address and signature.


OTHER REQUIREMENTS AND INFORMATION

§63.11625 What parts of the General Provisions apply to my facility?

Table 1 of this subpart shows which parts of the General Provisions in §§63.1 through 63.16 apply to you.

§63.11626 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by EPA or a delegated authority such as your State, local, or Tribal agency. If the EPA Administrator has delegated authority to your State, local, or Tribal agency, then that agency has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or Tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or Tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are retained by the EPA Administrator and are not transferred to the State, local, or Tribal agency.

(c) The authorities that cannot be delegated to State, local, or Tribal agencies are specified in paragraphs (c)(1) through (5) of this section.

(1) Approval of an alternative nonopacity emissions standard under §63.6(g).

(2) Approval of an alternative opacity emissions standard under §63.6(h)(9).

(3) Approval of a major change to test methods under §63.7(e)(2)(ii) and (f). A “major change to test method” is defined in §63.90.

(4) Approval of a major change to monitoring under §63.8(f). A “major change to monitoring” is defined in §63.90.

(5) Approval of a major change to recordkeeping and reporting under §63.10(f). A “major change to recordkeeping/reporting” is defined in §63.90.

§63.11627 What definitions apply to this subpart?

Terms used in this subpart are defined in the CAA, in §63.2, and in this section.

Animal feed includes: Dehydrated alfalfa meal; alfalfa prepared as feed for animals; cubed alfalfa; prepared animal feed; chopped, crushed, or ground barley feed; prepared bird feed; blended animal feed; bone meal prepared as feed for animals and fowls; cattle feeds, supplements, concentrates, and premixes; prepared chicken feeds; cattle feed citrus pulp; complete livestock feed; custom milled animal feed; dairy cattle feeds supplements, concentrates, and premixes; earthworm food and bedding; animal feed concentrates; animal feed premixes; animal feed supplements; prepared animal feeds; specialty animal (e.g., guinea pig, mice, mink) feeds; fish food for feeding fish; custom ground grains for animal feed; cubed hay; kelp meal and pellets animal feed; laboratory animal feed; livestock feeds, supplements, concentrates and premixes; alfalfa meal; bone meal prepared as feed for animals and fowls; livestock micro and macro premixes; mineral feed supplements; animal mineral supplements; pet food; poultry feeds, supplements, and concentrates; rabbit food; shell crushed and ground animal feed; swine feed; swine feed supplements, concentrates, and premixes; and prepared turkey feeds. Feed products produced for dogs and cats are not considered animal feed for the purposes of this subpart.
Average daily feed production level means the average amount of animal feed products produced each day over an annual period. The initial determination of the average daily feed production level is based on the one-year period prior to the compliance date for existing sources, or the design rate for new sources. The subsequent average daily feed production levels are determined annually and are based on the amount of animal feed products produced in a calendar year divided by the number of days in which the production processes were in operation.

Cyclone means a mechanically aided collector that uses inertia to separate particulate matter from the gas stream as it spirals through the cyclone.

Material containing chromium means a material that contains chromium (Cr, atomic number 24) in amounts greater than or equal to 0.1 percent by weight.

Material containing manganese means a material that contains manganese (Mn, atomic number 25) in amounts greater than or equal to 1.0 percent by weight.

Pelleting operations means all operations that make pelleted animal feed, including but not limited to, steam conditioning, die-casting, drying, cooling, and crumbling, and granulation.

Prepared feeds manufacturing facility means a facility that is primarily engaged in manufacturing animal feed. A facility is primarily engaged in manufacturing animal feed if the production of animal feed comprises greater than 50 percent of the total production of the facility on an annual basis. Facilities primarily engaged in raising or feeding animals are not prepared feed manufacturing facilities. Facilities engaged in the growing of agricultural crops that are used in the manufacturing of feed are not considered prepared feeds manufacturing facilities.

§§63.11628-63.11638  [Reserved]

Table 1 to Subpart DDDDDDD of Part 63—Applicability of General Provisions to Prepared Feeds Manufacturing Area Sources

As required in §63.11619, you must meet each requirement in the following table that applies to you.

<table>
<thead>
<tr>
<th>Citation</th>
<th>Subject</th>
<th>Applies to Subpart DDDDDDD?</th>
</tr>
</thead>
<tbody>
<tr>
<td>63.1</td>
<td>Applicability</td>
<td>Yes.</td>
</tr>
<tr>
<td>63.2</td>
<td>Definitions</td>
<td>Yes.</td>
</tr>
<tr>
<td>63.3</td>
<td>Units and Abbreviations</td>
<td>Yes.</td>
</tr>
<tr>
<td>63.4</td>
<td>Prohibited Activities and Circumvention</td>
<td>Yes.</td>
</tr>
<tr>
<td>63.5</td>
<td>Preconstruction Review and Notification Requirements</td>
<td>No.</td>
</tr>
<tr>
<td>63.6(a),(b)(1)-(b)(5), (b)(7), (c), (f)(2)-(3), (g), (i), and (j)</td>
<td>Compliance with Standards and Maintenance Requirements</td>
<td>Yes.</td>
</tr>
<tr>
<td>63.6(e)(1), (e)(3), (f)(1), and (h)</td>
<td>Startup, shutdown, and malfunction requirements and opacity/visible emission standards</td>
<td>No. Standards apply at all times, including during startup, shutdown, and malfunction events.</td>
</tr>
<tr>
<td>63.7</td>
<td>Performance Testing Requirements</td>
<td>Yes.</td>
</tr>
<tr>
<td>63.8</td>
<td>Monitoring Requirements</td>
<td>Yes.</td>
</tr>
<tr>
<td>63.9(a), (b), (c), (d), (h), (i), and (j)</td>
<td>Notification Requirements</td>
<td>Yes.</td>
</tr>
<tr>
<td>Citation</td>
<td>Subject</td>
<td>Applies to Subpart DDDDDDDD?</td>
</tr>
<tr>
<td>----------</td>
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<td>-----------------------------</td>
</tr>
<tr>
<td>63.9(e), (f), (g)</td>
<td>Recordkeeping and Reporting Requirements</td>
<td>No.</td>
</tr>
<tr>
<td>63.10(a), (b)(1), (b)(2)(i)-(iii), (b)(2)(vi)-(xiv), (c), (d)(1), (e), and (f)</td>
<td>Recordkeeping and Reporting Requirements</td>
<td>Yes.</td>
</tr>
<tr>
<td>63.10(b)(2)(iv)-(v), (b)(3), and (d)(2)-(5)</td>
<td>Recordkeeping and Reporting Requirements</td>
<td>No.</td>
</tr>
<tr>
<td>63.11</td>
<td>Control Device Requirements</td>
<td>No.</td>
</tr>
<tr>
<td>63.12</td>
<td>State Authorities and Delegations</td>
<td>Yes.</td>
</tr>
<tr>
<td>63.13</td>
<td>Addresses</td>
<td>Yes.</td>
</tr>
<tr>
<td>63.14</td>
<td>Incorporations by Reference</td>
<td>Yes.</td>
</tr>
<tr>
<td>63.15</td>
<td>Availability of Information and Confidentiality</td>
<td>Yes.</td>
</tr>
<tr>
<td>63.16</td>
<td>Performance Track Provisions</td>
<td>Yes.</td>
</tr>
<tr>
<td>63.1(a)(5), (a)(7)-(9), (b)(2), (c)(3)-(4), (d), 63.6(b)(6), (c)(3), (c)(4), (d), (e)(2), (e)(3)(ii), (h)(3), (h)(5)(iv), 63.8(a)(3), 63.9(b)(3), (h)(4), 63.10(c)(2)-(4), (c)(9)</td>
<td>Reserved</td>
<td>No.</td>
</tr>
</tbody>
</table>
Source Description and Location

Source Name: Kent Nutrition Group  
Source Location: 2407 S CR 400 E, Logansport, IN 46947  
County: Cass  
SIC Code: 2048 (Prepared Feeds)  
Operation Permit No.: M017-43150-00024  
Permit Reviewer: Brian Wright

On August 12, 2020, the Office of Air Quality (OAQ) received an application from Kent Nutrition Group related to the construction and operation of a new stationary prepared feeds manufacturing facility.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Cass County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM₂₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM₂₅ standard.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) 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 NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Cass County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM₂₅
Cass County has been classified as attainment for PM₂₅. Therefore, direct PM₂₅, SO₂, and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Cass 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.

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.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Kent Nutrition Group on August 12, 2020, relating to the construction and operation of a new prepared feeds manufacturing facility.

The following is a list of the new emission units and pollution control device(s):

- (a) One (1) pellet mill, identified as EU-3A, approved in 2020 for construction, with a maximum throughput of 12 tons per hour, equipped with a pellet cooler, using cyclone EP1 as particulate control, and exhausting to stack EP-1. [40 CFR 63, Subpart DDDDDDD]

- (b) One (1) grain receiving area, identified as EU-2, constructed in 1977, with a maximum capacity of 50 tons per hour, uncontrolled, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

- (c) Ingredient bins, identified as EU-1, constructed in 1977, receiving loadout from the receiving area, with a total maximum throughput of 10 tons per hour, uncontrolled, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

- (d) One (1) hammermill, identified as EU-6, constructed in 1977, with a maximum throughput of 10 tons per hour, using a dust collector as particulate control, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

- (e) Storage bins, identified as EU-9, constructed in 1977, receiving grain from the hammermill, with a maximum throughput of 20 tons per hour, uncontrolled, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

- (f) One (1) mixer, identified as EU-10, constructed in 1977, with a maximum throughput of 10 tons per hour, uncontrolled, exhausting indoors. [40 CFR 63, Subpart DDDDDDD]
(g) One (1) pellet mill, identified as EU-4A, constructed in 1977, with a maximum throughput of 12 tons per hour, equipped with a pellet cooler, using cyclone EP2 as particulate control, and exhausting to stack EP-2. [40 CFR 63, Subpart DDDDDDD]

(h) Bulk bins, identified as EU-7, constructed in 1977, receiving finished pellets from the pellet mills, with a maximum throughput of 10 tons per hour, using a dust collector as particulate control, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(i) Bulk Loadout, identified as EU-8, constructed in 1977, with a maximum throughput of 20 tons per hour, uncontrolled, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(j) One (1) bagger for bagging pellets, identified as EU-5, constructed in 1977, with a maximum throughput of 20 tons per hour, using a dust collector as particulate control, and exhausting indoors. [40 CFR 63, Subpart DDDDDDD]

(k) One (1) natural gas-fired boiler, identified as Boiler 1, constructed in 1977, with a maximum heat input rate of 4.1 MMBtu/hr.

Enforcement Issues

IDEM is aware that equipment has been constructed and/or operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit and/or operating rules.

Emission Calculations

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

Permit Level Determination – MSOP

This table reflects the unrestricted potential emissions of the source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Unrestricted Source-Wide Emissions (ton/year)</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.₅¹,²</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP³</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives*</td>
<td>111.55</td>
<td>53.82</td>
<td>49.43</td>
<td>0.01</td>
<td>1.76</td>
<td>0.10</td>
<td>1.48</td>
<td>0.03 Hexane</td>
<td>0.03</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>--</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>--</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>50</td>
<td>50</td>
<td>100</td>
<td>10</td>
<td>25</td>
</tr>
<tr>
<td>Total PTE of Entire Source Including Source-Wide Fugitives*</td>
<td>116.10</td>
<td>54.73</td>
<td>49.65</td>
<td>0.01</td>
<td>1.76</td>
<td>0.10</td>
<td>1.48</td>
<td>0.03 Hexane</td>
<td>0.03</td>
</tr>
<tr>
<td>MSOP Thresholds</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>100</td>
<td>10</td>
<td>25</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM₂.₅ listed is direct PM₂.₅.
³Single highest source-wide HAP.
*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 2-1.1-1) of PM10 and PM2.5 are each less than one hundred (100) tons per year, but equal to or greater than twenty-five (25) tons per year. The potential to emit of all other regulated air pollutants is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. The source will be issued an Minor Source Operating Permit (MSOP).

(b) The potential to emit (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1) 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) and not subject to the provisions of 326 IAC 2-7. The source will be issued an Minor Source Operating Permit (MSOP).

_Federal Rule Applicability Determination_

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 the boiler, because the boiler has a maximum heat input rate of less than 10 MMBtu/hr.

(b) The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60, Subpart DD and 326 IAC 12, are not included in the permit because the source is not a grain terminal elevator or grain storage elevator as defined by 40 CFR 60.301. The source manufactures animal food.

(c) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial for Institutional, Commercial, and Industrial Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD and 326 IAC 20-95 are not included in the permit for the boiler, since the source is not a major source of HAPs.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included in the permit for the boiler, because it is a gas fired boiler as defined by 40 CFR 63.11237.

(b) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Area Sources: Prepared Feeds Manufacturing, 40 CFR 63, Subpart DDDDDDDD, because it is a prepared feeds manufacturing facility that uses a material containing chromium or a material containing manganese and is an area source of emissions of hazardous air pollutants (HAP). The compliance date for this source is January 5, 2012. The units subject to this rule include the following:

(a) One (1) grain receiving area, identified as EU-2, constructed in 1977, with a maximum capacity of 50 tons per hour, uncontrolled, and exhausting indoors.

(c) One (1) hammermill, identified as EU-6, constructed in 1977, with a maximum throughput of 10 tons per hour, using a dust collector as particulate control, and exhausting indoors.
(d) Storage bins, identified as EU-9, constructed in 1977, receiving grain from the hammermill, with a maximum throughput of 20 tons per hour, uncontrolled, and exhausting indoors.

(e) One (1) mixer, identified as EU-10, constructed in 1977, with a maximum throughput

(f) One (1) pellet mill, identified as EU-3A, approved in 2020 for construction, with a maximum throughput of 12 tons per hour, equipped with a pellet cooler, using cyclone EP1 as particulate control, and exhausting to stack EP-1.

(g) One (1) pellet mill, identified as EU-4A, constructed in 1977, with a maximum throughput of 12 tons per hour, equipped with a pellet cooler, using cyclone EP2 as particulate control, and exhausting to stack EP-2.

(h) Bulk bins, identified as EU-7, constructed in 1977, receiving finished pellets from the pellet mills, with a maximum throughput of 10 tons per hour, using a dust collector as particulate control, and exhausting indoors.

(i) Bulk Loadout, identified as EU-8, constructed in 1977, with a maximum throughput of 20 tons per hour, uncontrolled, and exhausting indoors.

(j) One (1) bagger for bagging pellets, identified as EU-5, constructed in 1977, with a maximum throughput of 20 tons per hour, using a dust collector as particulate control, and exhausting indoors.

This source is subject to the following portions of Subpart DDDDDDD:

(1) 40 CFR 63. 11619(a), (b)(1), (c), and (e)
(2) 40 CFR 63. 11620(a)
(3) 40 CFR 63. 11621(a) through (d)
(4) 40 CFR 63. 11622(a) and (b)
(5) 40 CFR 63. 11624
(6) 40 CFR 63. 11625
(7) 40 CFR 63. 11626
(8) 40 CFR 63. 11627
(9) 40 CFR 63. 11628

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to the source except as otherwise specified in 40 CFR 63, Subpart DDDDDDD. 

(f) There are no 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):**

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

**State Rule Applicability - Entire Source**

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

**326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))**

MSOP applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP section of this document.
326 IAC 2-2 (PSD)  
The potential to emit of all PSD regulated pollutants are below 250 tons per year and this source is not 1 of 28 source categories. Therefore, 326 IAC 2-2 does not apply.

326 IAC 2-6 (Emission Reporting)  
This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, Clark, or Floyd County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

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

1. 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.

2. 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.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
The source is subject to the requirements of 326 IAC 6-4, because the paved 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 Cass 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 Cass 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 for this source has been reviewed as follows:

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
(a) Pursuant to 326 IAC 6-3-1(b)(14), the ingredient bins, bulk bins, storage bins, bagger, and pellet loadout are not subject to the requirements of 326 IAC 6-3, since each has potential particulate emissions of less than 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 grain receiving, mixing, hammermill, bulk loadout, pelleting operations, and pellet coolers, since each is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and 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).

The units listed below are subject to the requirements of 326 IAC 6-3-2, since they are manufacturing processes and each have potential particulate emissions greater than 0.551 pounds per hour. Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Processes), particulate emissions from the following units shall not exceed the allowable emissions rate specified in the table below:

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>P (ton/hr)</th>
<th>E (lb/hr)</th>
<th>Uncontrolled PM Emissions (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grain receiving area</td>
<td>50</td>
<td>44.58</td>
<td>0.85</td>
</tr>
<tr>
<td>Mixer</td>
<td>10.0</td>
<td>19.18</td>
<td>0.61</td>
</tr>
<tr>
<td>Hammermill</td>
<td>10.0</td>
<td>19.18</td>
<td>4.47</td>
</tr>
<tr>
<td>Bulk Loadout</td>
<td>20.0</td>
<td>30.51</td>
<td>1.22</td>
</tr>
<tr>
<td>Pelletizing (EU-3A)</td>
<td>12.0</td>
<td>21.67</td>
<td>4.32</td>
</tr>
<tr>
<td>Pelletizing (EU-4A)</td>
<td>12.0</td>
<td>21.67</td>
<td>4.32</td>
</tr>
<tr>
<td>Pellet Cooler (EU-3A)</td>
<td>12.0</td>
<td>21.67</td>
<td>4.32</td>
</tr>
<tr>
<td>Pellet Cooler (EU-4A)</td>
<td>12.0</td>
<td>21.67</td>
<td>4.32</td>
</tr>
</tbody>
</table>

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:

\[ E = 4.10 \cdot P^{0.67} \]

where \( E = \) rate of emission in pounds per hour and \( P = \) process weight rate in tons per hour.

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

\[ E = 55.0 \cdot P^{0.11} - 40 \]

where \( E = \) rate of emission in pounds per hour; and \( P = \) process weight rate in tons per hour.

Based on calculations, a control device is not needed to comply with these limits.

**Natural Gas Combustion**

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

Pursuant to 326 IAC 6-2-1(d), the boilers is an indirect heating facility existing and in operation, or received permit to construct, after September 21, 1983 and not located in Lake, Porter, Marion, Boone, Hamilton, Hendricks, Johnson, Morgan, Shelby, or Hancock Counties and 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:

\[ Pt = \text{Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).} \]
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.

For Q less than 10 mmBtu/hr, Pt shall not exceed 0.6. For Q greater than or equal to 10,000 mmBtu/hr.

**326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)**
The natural gas-fired boiler is not subject to the requirements of 326 IAC 6-3, since it is not a "manufacturing process" as defined by 326 IAC 6-3-1.5.

**326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)**
Pursuant to 326 IAC 7-1.1-1, the natural gas-fired boiler is not subject to the requirements of 326 IAC 7-1, since it has unlimited sulfur dioxide (SO₂) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

**326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**
Each of the natural gas-fired boiler and roaster is not subject to the requirements of 326 IAC 8-1-6, since each has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

<table>
<thead>
<tr>
<th>Compliance Determination and Monitoring Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) The Compliance Determination Requirements applicable to this source are as follows:</td>
</tr>
<tr>
<td><strong>Testing Requirements:</strong></td>
</tr>
<tr>
<td>(1) IDEM OAQ has determined that testing of the grain receiving, mixing, hammermill, bulk loadout, pelletizing operations, and pellet coolers is not required at this time to determine compliance with the PM emission limits. IDEM has the authority to require testing at a later time if necessary to demonstrate compliance with any applicable requirement.</td>
</tr>
<tr>
<td>(b) The Compliance Monitoring Requirements applicable to this source are as follows:</td>
</tr>
<tr>
<td>There are no compliance requirements applicable to this source.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Conclusion and Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>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 August 12, 2020.</td>
</tr>
<tr>
<td>The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. M017-43150-. The staff recommends to the Commissioner that the New Source Construction and MSOP be approved.</td>
</tr>
</tbody>
</table>
(a) If you have any questions regarding this permit, please contact Brian Wright, 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 (317) 234-6544 or (800) 451-6027, and ask for Brian Wright or (317) 234-6544.

(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

### Emissions Summary

**Company Name:** Kent Nutrition Group  
**Source Address:** 2407 S CR 400 E, Logansport, IN 46947  
**Permit Number:** M017-43150-00024  
**Reviewer:** Brian Wright

<table>
<thead>
<tr>
<th>Emissions Units</th>
<th>PM</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;</th>
<th>SO&lt;sub&gt;2&lt;/sub&gt;</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Combined HAPs</th>
<th>Highest Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>tons/yr</td>
<td>tons/yr</td>
<td>tons/yr</td>
<td>tons/yr</td>
<td>tons/yr</td>
<td>tons/yr</td>
<td>tons/yr</td>
<td>tons/yr</td>
<td>tons/yr</td>
</tr>
<tr>
<td><strong>Non-Fugitive Emissions</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grain Processing</td>
<td>35.48</td>
<td>15.76</td>
<td>11.37</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Pelletizing</td>
<td>76.03</td>
<td>37.93</td>
<td>37.93</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Natural Gas</td>
<td>0.03</td>
<td>0.13</td>
<td>0.13</td>
<td>0.01</td>
<td>1.76</td>
<td>0.10</td>
<td>1.48</td>
<td>0.03</td>
<td>0.03</td>
</tr>
<tr>
<td><strong>Total PTE (Non-Fugitive)</strong></td>
<td>111.55</td>
<td>53.82</td>
<td>49.43</td>
<td>0.01</td>
<td>1.76</td>
<td>0.10</td>
<td>1.48</td>
<td>0.03</td>
<td>0.03</td>
</tr>
<tr>
<td><strong>Fugitive Emissions</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Paved Roads</td>
<td>4.56</td>
<td>0.91</td>
<td>0.22</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total PTE (Fugitive)</strong></td>
<td>4.56</td>
<td>0.91</td>
<td>0.22</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Total PTE (Non-Fugitive and Fugitive)</strong></td>
<td>116.10</td>
<td>54.73</td>
<td>49.65</td>
<td>0.01</td>
<td>1.76</td>
<td>0.10</td>
<td>1.48</td>
<td>0.03</td>
<td>0.03</td>
</tr>
<tr>
<td>Activity</td>
<td>Maximum Capacity (tons/hr)</td>
<td>PM Emission Factor* (lb/ton)</td>
<td>PM10 Emission factor* (lb/ton)</td>
<td>PM Emissions (tons/yr)</td>
<td>PM10 Emissions (tons/yr)</td>
<td>PM Emissions (tons/yr)</td>
<td>PM10 Emissions (tons/yr)</td>
<td>PM2.5 Emissions (tons/yr)</td>
<td>PM2.5 Emissions (tons/yr)</td>
</tr>
<tr>
<td>------------------</td>
<td>-----------------------------</td>
<td>------------------------------</td>
<td>--------------------------------</td>
<td>------------------------</td>
<td>-------------------------</td>
<td>------------------------</td>
<td>-------------------------</td>
<td>---------------------------</td>
<td>---------------------------</td>
</tr>
<tr>
<td>Grain Receiving</td>
<td>50.0</td>
<td>0.017</td>
<td>0.0025</td>
<td>0.0025</td>
<td>3.72</td>
<td>0.55</td>
<td>0.55</td>
<td>0.85</td>
<td>44.58</td>
</tr>
<tr>
<td>Ingredient Bins</td>
<td>10.0</td>
<td>0.025</td>
<td>0.0063</td>
<td>0.0011</td>
<td>1.10</td>
<td>0.28</td>
<td>0.05</td>
<td>0.25</td>
<td>N/A***</td>
</tr>
<tr>
<td>Mixing</td>
<td>10.0</td>
<td>0.0610</td>
<td>0.0340</td>
<td>0.0058</td>
<td>2.67</td>
<td>1.49</td>
<td>0.25</td>
<td>0.61</td>
<td>19.18</td>
</tr>
<tr>
<td>Hammermill***</td>
<td>10.0</td>
<td>0.4467</td>
<td>0.2233</td>
<td>0.2233</td>
<td>19.56</td>
<td>9.78</td>
<td>9.78</td>
<td>4.47</td>
<td>19.18</td>
</tr>
<tr>
<td>Bulk Bins</td>
<td>12.0</td>
<td>0.017</td>
<td>0.0025</td>
<td>0.0025</td>
<td>0.89</td>
<td>0.13</td>
<td>0.13</td>
<td>0.20</td>
<td>N/A***</td>
</tr>
<tr>
<td>Bulk Loadout</td>
<td>20.0</td>
<td>0.0610</td>
<td>0.0340</td>
<td>0.0058</td>
<td>5.34</td>
<td>2.98</td>
<td>0.51</td>
<td>1.22</td>
<td>30.51</td>
</tr>
<tr>
<td>Storage Bins</td>
<td>20.0</td>
<td>0.025</td>
<td>0.0063</td>
<td>0.0011</td>
<td>2.19</td>
<td>0.55</td>
<td>0.10</td>
<td>0.50</td>
<td>N/A***</td>
</tr>
<tr>
<td>Bagger</td>
<td>20.0</td>
<td>0.025</td>
<td>0.0063</td>
<td>0.0011</td>
<td>2.19</td>
<td>0.55</td>
<td>0.10</td>
<td>0.50</td>
<td>N/A***</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>35.48</td>
<td>15.76</td>
<td>11.37</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Methodology


**The uncontrolled emission factor from grinding was calculated from the AP-42 controlled emission factor and assuming a control efficiency of 85% for cyclones. Based on AP-42 Table 9.9.1-2, PM-10 and PM2.5 emission factors for the grinder were estimated by taking 50 percent of the filterable PM emission factor.


***326 IAC 6-3-2 does not apply since potential PM emissions are less than 0.551 lbs/hr

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate up to sixty thousand (60,000) pounds per hour:

E = 4.10 P^{0.67} For P >60,0000 lb/hr, E = 55*P^{0.11} - 40
<table>
<thead>
<tr>
<th>Activity</th>
<th>Maximum Capacity (tons/hr)</th>
<th>PM Emission Factor* (lb/ton)</th>
<th>PM0.10 Emission Factor* (lb/ton)</th>
<th>PM0.25 Emission Factor* (lb/ton)</th>
<th>PM Emissions (tons/yr)</th>
<th>PM10 Emissions (tons/yr)</th>
<th>PM 2.5 Emissions (tons/yr)</th>
<th>326 IAC 6-3-2 Limit (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pelletizing (EU-3A)</td>
<td>12.0</td>
<td>0.36</td>
<td>0.18</td>
<td>0.18</td>
<td>18.92</td>
<td>9.46</td>
<td>9.46</td>
<td>4.32</td>
</tr>
<tr>
<td>Pelletizing (EU-4A)</td>
<td>12.0</td>
<td>0.36</td>
<td>0.18</td>
<td>0.18</td>
<td>18.92</td>
<td>9.46</td>
<td>9.46</td>
<td>4.32</td>
</tr>
<tr>
<td>Pellet Cooler (EU-3A)</td>
<td>12.0</td>
<td>0.36</td>
<td>0.18</td>
<td>0.18</td>
<td>18.92</td>
<td>9.46</td>
<td>9.46</td>
<td>4.32</td>
</tr>
<tr>
<td>Pellet Cooler (EU-4A)</td>
<td>12.0</td>
<td>0.36</td>
<td>0.18</td>
<td>0.18</td>
<td>18.92</td>
<td>9.46</td>
<td>9.46</td>
<td>4.32</td>
</tr>
<tr>
<td>Pellet Loadout</td>
<td>24.0</td>
<td>0.0033</td>
<td>0.0008</td>
<td>0.0008</td>
<td>0.35</td>
<td>0.08</td>
<td>0.08</td>
<td>N/A***</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>76.03</strong></td>
<td></td>
<td><strong>37.93</strong></td>
<td><strong>37.93</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Methodology**


***326 IAC 6-3-2 does not apply since potential PM emissions are less than 0.551 lbs/hr

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate up to sixty thousand (60,000) pounds per hour:

\[ E = C \times P^{0.67} \]

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

\[ E = 55.0 \times P^{0.11} - 40 \]

where \( E \) = rate of emission in pounds per hour; and

\( P \) = process weight rate in tons per hour
### Natural Gas Combusiton Only

**Company Name:** Kent Nutrition Group  
**Source Address:** 2407 S CR 400 E, Logansport, IN 46947  
**Permit Number:** M017-43150-00024  
**Reviewer:** Brian Wright

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
<td>84</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>0.03</td>
<td>0.13</td>
<td>0.13</td>
<td>0.01</td>
<td>1.76</td>
<td>0.10</td>
<td>1.48</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
PM2.5 emission factor is filterable and condensable PM2.5 combined.  
**Emission Factors for NOx: 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**  

### Hazardous Air Pollutants (HAPs)

**HAPs - Organics**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>3.7E-05</td>
<td>2.1E-05</td>
<td>1.3E-03</td>
<td>0.03</td>
<td>6.0E-05</td>
<td>0.03</td>
</tr>
</tbody>
</table>

**HAPs - Metals**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>8.8E-06</td>
<td>1.9E-05</td>
<td>2.5E-05</td>
<td>6.7E-06</td>
<td>3.7E-05</td>
<td>9.6E-05</td>
</tr>
</tbody>
</table>

Methodology is the same as above.  
The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
## Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

### Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight Loaded (tons/trip)</th>
<th>Maximum trips driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (miles/day)</th>
<th>Maximum one-way distance (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant empty) (one-way trip)</td>
<td>18.0</td>
<td>1.0</td>
<td>18.0</td>
<td>8.0</td>
<td>144.0</td>
<td>900</td>
<td>0.170</td>
<td>3.1</td>
</tr>
<tr>
<td>Vehicle (leaving plant full) (one-way trip)</td>
<td>18.0</td>
<td>1.0</td>
<td>18.0</td>
<td>40.0</td>
<td>720.0</td>
<td>900</td>
<td>0.170</td>
<td>3.1</td>
</tr>
<tr>
<td>Vehicle (entering plant full) (one-way trip)</td>
<td>18.0</td>
<td>1.0</td>
<td>18.0</td>
<td>40.0</td>
<td>720.0</td>
<td>900</td>
<td>0.170</td>
<td>3.1</td>
</tr>
<tr>
<td>Vehicle (leaving plant empty) (one-way trip)</td>
<td>18.0</td>
<td>1.0</td>
<td>18.0</td>
<td>8.0</td>
<td>144.0</td>
<td>900</td>
<td>0.170</td>
<td>3.1</td>
</tr>
</tbody>
</table>

### Totals

- **72.0**
- **1728.0**
- **12.3**
- **4479.5**

### Average Vehicle Weight Per Trip

- **24.0 tons/trip**
- **0.17 miles/trip**

### Unmitigated Emission Factor, $E_f$

$$E_f = [k * (sL)^{0.91} * (W)^{1.02}]$$

where:
- $k = 0.011$ for PM
- $0.0022$ for PM10
- $0.00054$ for PM2.5
- $W = 24.0$ tons (average vehicle weight provided by source)
- $sL = 9.700$ g/m² (silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

### Mitigated Emission Factor, $E_{ext}$

$$E_{ext} = E_f * [1 - (p/4N)]$$

where:
- $p = 125$ days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
- $N = 365$ days per year

<table>
<thead>
<tr>
<th>Process</th>
<th>Unmitigated PTE of PM (tons/yr)</th>
<th>Unmitigated PTE of PM10 (tons/yr)</th>
<th>Unmitigated PTE of PM2.5 (tons/yr)</th>
<th>Mitigated PTE of PM (tons/yr)</th>
<th>Mitigated PTE of PM10 (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (tons/yr)</th>
<th>Controlled PTE of PM (tons/yr)</th>
<th>Controlled PTE of PM10 (tons/yr)</th>
<th>Controlled PTE of PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>1.25</td>
<td>0.25</td>
<td>0.06</td>
<td>1.14</td>
<td>0.23</td>
<td>0.06</td>
<td>1.14</td>
<td>0.23</td>
<td>0.06</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>1.25</td>
<td>0.25</td>
<td>0.06</td>
<td>1.14</td>
<td>0.23</td>
<td>0.06</td>
<td>1.14</td>
<td>0.23</td>
<td>0.06</td>
</tr>
</tbody>
</table>

### Totals

- **4.98**
- **1.00**
- **0.24**
- **4.56**
- **0.91**
- **0.22**
- **4.56**
- **0.91**
- **0.22**

### Methodology

- **Total Weight driven per day (ton/day)** = $[\text{Maximum Weight Loaded (tons/trip)}] * [\text{Maximum trips per day (trip/day)}]$
- **Maximum one-way miles (miles/day)** = $[\text{Maximum one-way distance (feet/trip)}] / (5280 \text{ ft/mile})$
- **Average Vehicle Weight Per Trip (tons/trip)** = $\sum(\text{Total Weight driven per day (ton/day)}) / \sum(\text{Maximum trips per day (trip/day)})$
- **Average Miles Per Trip (miles/trip)** = $\sum(\text{Maximum one-way miles (miles/day)}) / \sum(\text{Maximum trips per year (trip/day)})$
- **Unmitigated PTE (tons/yr)** = $[\text{Maximum one-way miles (miles/yr)}] * [\text{Unmitigated Emission Factor (lb/mile)}] * [\text{1 (ton/2000 lbs)}]$
- **Mitigated PTE (tons/yr)** = $[\text{Mitigated Emission Factor (lb/mile)}] * [\text{1 (ton/2000 lbs)}]$
- **Controlled PTE (tons/yr)** = $[\text{Mitigated Emission Factor (lb/mile)}] * [\text{1 - Dust Control Efficiency}]$

### Abbreviations

- PM = Particulate Matter
- PM10 = Particulate Matter (<10 um)
- PM2.5 = Particulate Matter (<2.5 um)
- PTE = Potential to Emit
January 12, 2021

Justin Ford  
Kent Nutrition Group, Inc.  
1600 Oregon St  
Muscatine, IA 52761

Re: Public Notice  
Kent Nutrition Group, Inc.  
Permit Level: MSOP New Source Construction  
Minor PSD  
Permit Number: 017-43150-00024

Dear Mr. Ford:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

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 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 preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, are available electronically at:

IDEM's online searchable database: [http://www.in.gov/apps/idem/caats/](http://www.in.gov/apps/idem/caats/) . Choose Search Option by Permit Number, then enter permit 43150

and

IDEM's Virtual File Cabinet (VFC): [http://www.IN.gov/idem](http://www.IN.gov/idem) . Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

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/idem/5474.htm](https://www.in.gov/idem/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 Logansport – Cass County Public Library, 616 East Broadway in Logansport, 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 draft permit 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 Brian Wright, 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 4-6544 or dial (317) 234-6544.

Sincerely,

Theresa Weaver

Theresa Weaver
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020
January 12, 2021

To: Logansport – Cass County 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: Kent Nutrition Group, Inc.
Permit Number: 017-43150-00024

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 Smiddle-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
Notice of Public Comment

January 12, 2021
Kent Nutrition Group, Inc.
017-43150-00024

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.
Mail Code 61-53

<table>
<thead>
<tr>
<th>Name and address of Sender</th>
<th>Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204</th>
<th>Type of Mail: CERTIFICATE OF MAILING ONLY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line</td>
<td>Article Number</td>
<td>Name, Address, Street and Post Office Address</td>
</tr>
<tr>
<td>1</td>
<td></td>
<td>Justin Ford Kent Nutrition Group Inc 1600 Oregon St Muscatine IA 52761 (Source CAATS)</td>
</tr>
<tr>
<td>2</td>
<td></td>
<td>Mr. Harry D. DuVall P.O. Box 147 Idaville IN 47950 (Affected Party)</td>
</tr>
<tr>
<td>3</td>
<td></td>
<td>Cass County Board of Commissioners 200 Court Park Logansport IN 46947 (Local Official)</td>
</tr>
<tr>
<td>4</td>
<td></td>
<td>Cass County Health Department 512 High Street Logansport IN 46947-2766 (Health Department)</td>
</tr>
<tr>
<td>5</td>
<td></td>
<td>Logansport-Cass County Public Library 616 E Broadway Logansport IN 46947-3187 (Library)</td>
</tr>
<tr>
<td>6</td>
<td></td>
<td>Kurt Brandstatter Central Paving, Inc. P.O. Box 357 Logansport IN 46947 (Affected Party)</td>
</tr>
<tr>
<td>7</td>
<td></td>
<td>Christina Seiler The Rochester Sentinel PO Box 260 Rochester IN 46975 (Affected Party)</td>
</tr>
<tr>
<td>8</td>
<td></td>
<td>Joe &amp; Navi Vernon 288 S 950 E Peru IN 46970 (Affected Party)</td>
</tr>
<tr>
<td>9</td>
<td></td>
<td>Cynthia White 7 Parkwood Dr Logansport IN 46947 (Affected Party)</td>
</tr>
<tr>
<td>10</td>
<td></td>
<td>Patrick &amp; Victoria Kleckner 2272 S CR 175 W Logansport IN 46947 (Affected Party)</td>
</tr>
<tr>
<td>11</td>
<td></td>
<td>Jim &amp; Mercedes Brugh 1315 E Market St Logansport IN 46947 (Affected Party)</td>
</tr>
<tr>
<td>12</td>
<td></td>
<td>Joe Scheider 1860 N CR 525 E Logansport IN 46947 (Affected Party)</td>
</tr>
<tr>
<td>13</td>
<td></td>
<td>Ashley Packard 1830 Spear St Logansport IN 46947 (Affected Party)</td>
</tr>
<tr>
<td>14</td>
<td></td>
<td>Stephanie Buffum 3525 High St Logansport IN 46947 (Affected Party)</td>
</tr>
<tr>
<td>15</td>
<td></td>
<td>Dawn McAlister 2715 E Broadway Logansport IN 46947 (Affected Party)</td>
</tr>
</tbody>
</table>

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<th>Remarks</th>
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<td>Sheila Laing 1615 Miles Street Logansport IN 46947 (Affected Party)</td>
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Postmaster, Per (Name of Receiving employee):

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