The Office of Water Quality proposes the following NPDES DRAFT PERMIT:

MINOR – MODIFICATION

LOUIS DREYFUS COMPANY AGRICULTURAL INDUSTRIES, LLC., IN0063495, KOSCIUSKO COUNTY, 7344 State Road 15 South, Claypool, IN. This modification is because the facility is adding a lecithin processing and packaging operation to their facility. LDCAI is also installing a new boiler that will have additional 20 gpm of blowdown going to the equalization basin. Permit Manager: Megan Miller, 317/233-1854, mmiller@idem.in.gov. Posted online at https://www.in.gov/idem/6408.htm.

PROCEDURES TO FILE A RESPONSE

Draft can be viewed or copied (10¢ per page) at IDEM/OWQ NPDES PS, 100 North Senate Avenue, (Rm 1203) Indianapolis, IN, 46204 (east end elevators) from 9 – 4, Mon - Fri, (except state holidays). A copy of the Draft Permit is on file at the local County Health Department. Please tell others you think would be interested in this matter. For your rights & responsibilities see: Public Participation Guide: http://www.in.gov/idem/5474.htm or Citizens’ Guide to IDEM; https://www.in.gov/idem/6900.htm.

Response Comments: The proposed decision to issue a permit is tentative. Interested persons are invited to submit written comments on the Draft permit. All comments must be postmarked no later than the Response Date noted to be considered in the decision to issue a Final permit. Deliver or mail all requests or comments to the attention of the Permit Writer at the above address, (mail code 65-42 PS).

To Request a Public Hearing:

Any person may request a Public Hearing. A written request must be submitted to the above address on or before the Response Date noted. The written request shall include: the name and address of the person making the request, the interest of the person making the request, persons represented by the person making the request, the reason for the request and the issues proposed for consideration at the Hearing. IDEM will determine whether to hold a Public Hearing based on the comments and the rationale for the request. Public Notice of such a Hearing will be published in at least one newspaper in the geographical area of the discharge and sent to anyone submitting written comments and/or making such request and whose name is on the mailing list at least 30 days prior to the Hearing.
VIA ELECTRONIC MAIL

Mr. R. Gilberto Sifuentes, Plant Manager
Louis Dreyfus Company Agricultural Industries, LLC
7344 State Road 15 South
Claypool, IN 46510

Dear Mr. Sifuentes:

Re: NPDES Permit No. IN0063495
Draft Permit Modification
Louis Dreyfus Company Agricultural Industries, LLC
Claypool, IN, Kosciusko County

Your request for a permit modification has been reviewed and processed in accordance with rules adopted under 327 IAC 5. Enclosed is a copy of the draft permit modification.

Pursuant to IC 13-15-5-1, IDEM will publish the draft permit document online at https://www.in.gov/idem/5474.htm. Additional information on public participation can be found in the "Citizens' Guide to IDEM", available at https://www.in.gov/idem/6900.htm. A 30-day comment period is available to solicit input from interested parties, including the public.

Please review this draft permit modification and associated documents carefully to become familiar with the proposed terms and conditions. Comments concerning the draft permit modification should be submitted in accordance with the procedure outlined in the enclosed public notice form. We suggest that you meet with us to discuss major concerns or objections you may have with the draft permit modification.

Questions concerning this draft permit modification may be addressed to Megan Miller of my staff, at 317/233-1854 or mmiller@idem.in.gov.

Sincerely,

Nikki Gardner, Chief
Industrial NPDES Permits Section
Office of Water Quality
Enclosures

cc:  Kosciusko County Health Department
     Kurt Anderson, Facility Contact
     Lynn Raisor, IDEM Inspector
STATE OF INDIANA

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

AMENDED AUTHORIZATION TO DISCHARGE UNDER THE

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et seq., the “Clean Water Act” or “CWA”), and IDEM’s permitting authority under IC 13-15,

LOUIS DREYFUS COMPANY AGRICULTURAL INDUSTRIES, LLC

is authorized to discharge from a bio-diesel facility that is located at 7344 State Road 15 South, Claypool, Indiana, to receiving waters identified as an unnamed pond in accordance with effluent limitations, monitoring requirements, and other conditions set forth in Parts I and II hereof.

The permit, as issued on April 16, 2020, is hereby amended, as contained herein. The amended provisions shall become effective ________________. All terms and conditions of the permit not modified at this time remain in effect. Further, any existing condition or term affected by the amendments will remain in effect until the amended provisions become effective. This permit may be revoked for the nonpayment of applicable fees in accordance with IC 13-18-20.

This permit and the authorization to discharge, as amended, shall expire at midnight April 30, 2025. In order to receive authorization to discharge beyond the date of expiration, the permittee shall submit such information and forms as are required by the Indiana Department of Environmental Management no later than 180 days prior to the date of expiration.

Issued on __________________________ for the Indiana Department of Environmental Management.

________________________
Jerry Dittmer, Chief
Permits Branch
Office of Water Quality
A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. The permittee is authorized to discharge from the outfall listed below in accordance with the terms and conditions of this permit. The permittee is authorized to discharge from Outfall 002, located at Latitude 41° 07’ 30”, Longitude -85° 53’ 20”. The discharge is limited to process wastewater from the Zero Effluent Discharge (ZED) surge tank overflow and from the glycerin distillation; non-process wastewaters consisting of cooling tower blowdown, boiler blowdown, RO reject water, softener regenerant, green sand filter backwash water; stormwater from tank farms; equipment Clean-In-Place (CIP) wastewater; and floor drain wastewaters from the boiler house, biodiesel production areas, degumming area, lecithin production areas, and the extraction area. Samples taken in compliance with the monitoring requirements below shall be taken at a point representative of the discharge but prior to entry into the unnamed pond. Such discharge shall be limited and monitored by the permittee as specified below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Quantity or Loading</th>
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<th>Monitoring Requirements</th>
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<td>CBOD₅</td>
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<td>Zinc[4]</td>
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<td>Chloride</td>
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<td>Sulfate</td>
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<td>TRC[5][6]</td>
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<td>TSS</td>
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<table>
<thead>
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<th>Parameter</th>
<th>Quality or Concentration</th>
<th>Monitoring Requirements</th>
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<td>9.0</td>
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<tr>
<td>Dissolved Oxygen[8]</td>
<td>6.0</td>
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</tr>
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## National Pollutant Discharge Elimination System
### Briefing Memo for
Louis Dreyfus Company Agricultural Industries, LLC
Draft modification: January 2021

Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

<table>
<thead>
<tr>
<th>Permittee:</th>
<th>Louis Dreyfus Company Agricultural Industries, LLC 7344 State Road 15 South Claypool, IN 46510</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing Permit Information:</td>
<td>Permit Number: IN0063495  Expiration Date: April 30, 2025</td>
</tr>
<tr>
<td>Facility Contact:</td>
<td>Kurt Anderson, SH&amp;E Manager (574)566-2143, <a href="mailto:kurt.anderson@idcom.com">kurt.anderson@idcom.com</a></td>
</tr>
<tr>
<td>Facility Location:</td>
<td>7344 State Road Claypool, IN Kosciusko County</td>
</tr>
<tr>
<td>Receiving Stream:</td>
<td>Unnamed Pond</td>
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<tr>
<td>GLI/Non-GLI:</td>
<td>Non-GLI</td>
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<tr>
<td>Proposed Permit Action:</td>
<td>Modify</td>
</tr>
<tr>
<td>Date Application Received:</td>
<td>November 10, 2020</td>
</tr>
<tr>
<td>Source Category:</td>
<td>NPDES Minor – Industrial</td>
</tr>
<tr>
<td>Permit Writer:</td>
<td>Megan Miller, Environmental Manager (317)233-1854, <a href="mailto:mmiller@idem.in.gov">mmiller@idem.in.gov</a></td>
</tr>
</tbody>
</table>
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1.0 INTRODUCTION

The Indiana Department of Environmental Management (IDEM) received a request from Louis Dreyfus Company Agricultural Industries, LLC on November 10, 2020 to modify National Pollutant Discharge Elimination System (NPDES) Permit IN0063495. The current five year permit was issued with an effective date of May 1, 2020 in accordance with 327 IAC 5-2-6(a).

The Federal Water Pollution Control Act (more commonly known as the Clean Water Act), as amended, (Title 33 of the United States Code (U.S.C.) Section 1251 et seq.), requires an NPDES permit for the discharge of pollutants into surface waters. Furthermore, Indiana law requires a permit to control or limit the discharge of any contaminants into state waters or into a publicly owned treatment works. This proposed permit action by IDEM complies with and implements these federal and state requirements.

In accordance with Title 40 of the Code of Federal Regulations (CFR) Section 124.7, as well as Title 327 of the Indiana Administrative Code (IAC) 327 Article 5-3-7, a Statement of Basis, or Briefing Memo, is required for certain NPDES permits. This document fulfills the requirements established in these regulations. This Briefing Memo was prepared in order to document the factors considered in the development of NPDES Permit effluent limitations. The technical basis for the Briefing Memo may consist of evaluations of promulgated effluent guidelines, existing effluent quality, receiving water conditions, Indiana water quality standards-based wasteload allocations, and other information available to IDEM. Decisions to award variances to Water Quality Standards or promulgated effluent guidelines are justified in the Briefing Memo where necessary. This Briefing Memo also identifies the modified pages of the permit as issued on April 16, 2020.

2.0 FACILITY DESCRIPTION

2.1 General

Louis Dreyfus Company Agricultural Industries, LLC is classified under Standard Industrial Classification (SIC) Codes 2075 – Soybean Oil Mills; 2079 – Edible Fats & Oils Not Elsewhere Classified; and 2869 – Industrial Organic Chemicals Not Elsewhere Classified. The facility manufactures soybean oil, soybean meal, and biodiesel.

Whole soybeans are received by truck and rail. The soybeans are stored, conditioned, heated, cracked, de-hulled, and flaked. The oil is removed from the soybean flakes using hexane. The flakes are then de-solventized, toasted, ground, and stored and shipped as soybean meal.

The soybean hulls are ground, pelletized, stored, and shipped. The hexane is distilled from the soybean oil and reused. The crude soybean oil is either shipped, or the gums are removed in a degumming process. A food-quality soy lecithin will now be produced from the gums that have been removed from the crude soybean oil.

The source water for the facility is groundwater. A map showing the location of the facility has been included as Figure 1.
Figure 1: Facility Location/Site Map

7344 State Road 15 South
Claypool, IN – Kosciusko County
2.2 Outfall Locations

<table>
<thead>
<tr>
<th>Outfall</th>
<th>Latitude</th>
<th>Longitude</th>
</tr>
</thead>
<tbody>
<tr>
<td>Outfall 001</td>
<td>41° 07’ 30”</td>
<td>-85° 53’ 20”</td>
</tr>
<tr>
<td>Outfall 002</td>
<td>41° 07’ 30”</td>
<td>-85° 53’ 20”</td>
</tr>
<tr>
<td>Outfall 003</td>
<td>41° 07’ 08”</td>
<td>-85° 53’ 20”</td>
</tr>
</tbody>
</table>

3.0 PERMIT MODIFICATION

3.1 Modification Request

Louis Dreyfus Company Agricultural Industries, LLC is adding a lecithin processing and packaging operation to their facility. The lecithin processing plant will produce food-quality soy lecithin from the gums that have been removed from crude soybean oil. This process will contribute three gallons per minute into the biodiesel pre-treat separator. LDCAI is also installing a new boiler that will have additional 20 gpm of blowdown going to the equalization basin.

A Water Balance Diagram has been included as Figure 2.
3.2 IDEM’s Proposed Modification

The requested addition of a lecithin processing and packaging operation for this facility is approved. The lecithin production area will contribute floor drain wastewater and will be sent through the biodiesel pre-treat separator before discharge. The process has been added to the authorized discharge section in Part I.A. of the permit. Changes in discharge concentration limits are not needed as there are no additional applicable federal effluent guidelines and the new process does not trigger the requirement for new WQBELs. The new boiler will contribute non-process wastewater and will be sent to the equalization basin before discharge.

3.3 Antibacksliding

Pursuant to 327 IAC 5-2-10(a)(11), unless an exception applies, a permit may not be renewed, reissued or modified to contain effluent limitations that are less stringent than the comparable effluent limitations in the previous permit. None of the limits included in this permit are less stringent than the comparable effluent limitations in the previous permit, therefore, backsliding is not an issue in accordance with 327 IAC 5-2-10(a)(11).
3.4 Antidegradation

Indiana’s Antidegradation Standards and Implementation procedures are outlined in 327 IAC 2-1.3. The antidegradation standards established by 327 IAC 2-1.3-3 apply to all surface waters of the state. The permittee is prohibited from undertaking any deliberate action that would result in a new or increased discharge of a bioaccumulative chemical of concern (BCC) or a new or increased permit limit for a regulated pollutant that is not a BCC unless information is submitted to the commissioner demonstrating that the proposed new or increased discharge will not cause a significant lowering of water quality, or an antidegradation demonstration submitted and approved in accordance 327 IAC 2-1.3-5 and 2-1.3-6.

The NPDES permit does not propose to establish a new or increased loading of a regulated pollutant; therefore, the Antidegradation Implementation Procedures in 327 IAC 2-1.3-5 and 2-1.3-6 do not apply to the permitted discharge.

3.5 Spill Response and Reporting Requirement

Reporting requirements associated with the Spill Reporting, Containment, and Response requirements of 327 IAC 2-6.1 are included in Part II.B.2.(d), Part II.B.3.(c), and Part II.C.3. of the NPDES permit. Spills from the permitted facility meeting the definition of a spill under 327 IAC 2-6.1-4(15), the applicability requirements of 327 IAC 2-6.1-1, and the Reportable Spills requirements of 327 IAC 2-6.1-5 (other than those meeting an exclusion under 327 IAC 2-6.1-3 or the criteria outlined below) are subject to the Reporting Responsibilities of 327 IAC 2-6.1-7.

It should be noted that the reporting requirements of 327 IAC 2-6.1 do not apply to those discharges or exceedances that are under the jurisdiction of an applicable permit when the substance in question is covered by the permit and death or acute injury or illness to animals or humans does not occur. In order for a discharge or exceedance to be under the jurisdiction of this NPDES permit, the substance in question (a) must have been discharged in the normal course of operation from an outfall listed in this permit, and (b) must have been discharged from an outfall for which the permittee has authorization to discharge that substance.

3.6 Permit Processing/Public Comment

Pursuant to IC 13-15-5-1, IDEM will publish the draft permit document online at https://www.in.gov/idem/5474.htm. Additional information on public participation can be found in the "Citizens’ Guide to IDEM", available at https://www.in.gov/idem/6900.htm. A 30-day comment period is available to solicit input from interested parties, including the public.